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A Cast of Questionable Characters: “Liberty Convention 2010” Comes to Missoula

The University of Montana’s Adams Center will be the venue for a gathering of anti-government “patriots” over the weekend of May 21-22, 2010. Organized by Bitterroot Valley’s Celebrating Conservatism, the “Liberty Convention 2010” features a slate of prominent anti-government speakers, including three individuals the Southern Poverty Law Center has named to its list of activists “at the heart” of the resurgent “patriot” movement across the country.

“Celebrating Conservatism continues to bring ‘patriots’ with erroneous interpretations of the Constitution and American history into Montana to peddle their conspiracy theories,” said the Human Rights Network’s Travis McAdam. “The only significant difference this time is that all the speakers will be in one place at one time, and the organizers claim thousands of people will attend.”

The Human Rights Network released a special report (see “Liberty Convention 2010 Speakers” below) with background on seven of the speakers listed on promotional fliers. The slate includes an anti-Semitic tax protestor; a former sheriff adored by the militia movement; a former presidential candidate for a party that combines Christian fundamentalism and themes of the anti-government movement; and a gun rights activist from Alaska who has been arrested twice in the past few months.

University of Montana officials have confirmed that firearms are not allowed in the Adams Center. The Human Rights Network has also heard it will be up to Celebrating Conservatism to make sure firearms are not brought into the facility. This directly contradicts the group’s regular practice of encouraging its followers to bring firearms to events. None of the promotional materials reviewed by the Human Rights Network for the “Liberty Convention” have included notices that firearms are not allowed in campus facilities. The Network has also received reports that the organizers, when asked about firearms, are not providing clear instructions to potential attendees.

“Celebrating Conservatism and many of the speakers coming in are fanatical about carrying weapons in public,” said McAdam. “They should be required to follow the rules just like any other organization renting the Adams Center. Given the group’s usual practices, it doesn’t seem like the organizers are doing their due diligence to make sure they follow this requirement.”

The Human Rights Network believes that Montanans need to understand the types of people providing the ideological foundation for groups like Celebrating Conservatism. “We think these are the last people that communities should look to for guidance and information,” said McAdam.

“Liberty Convention 2010” Speakers

Mona Docteur, founder of Celebrating Conservatism

Promotional materials for the “Liberty Convention” state that Mona Docteur will be sharing her experience starting Celebrating Conservatism in the Bitterroot Valley. She hopes attendees will create similar right-wing groups in their communities. She’s already attempted to start groups in Libby and Polson.¹

Docteur, who works for Primerica Financial Services in Hamilton, Montana, got involved in the Ravalli County Republican Women’s Club a few years ago when she “felt really ignorant about politics.” However, she and former Celebrating Conservatism organizer Dan Cox resigned from the local Republican Party in 2009. They cited concerns that “fake” Republicans had infested the local GOP, and the party did not share their values.²

A transplant from Southern California, Docteur has claimed that her group’s intent is merely to educate the public on what it means to be conservative.³ However, the activities of the group and statements by its activists fall outside most people’s definition of mainstream conservatism. Based on the “patriot” speakers Celebrating Conservatism has repeatedly brought into Montana, it is clear the group is dedicated to pushing an anti-government “patriot” agenda.

In January 2010, Celebrating Conservatism served as the conduit for a militia petition and letter submitted to the Ravalli County Sheriff and County Commission. A group referring to themselves as “extremely concerned Ravalli County citizens” asked the county sheriff and commissioners to sign off on the petition, which asked them to uphold their oath of office. One of the petition demands was that the county sheriff “form and command a County Militia.” Failure to sign the petition would result in a citizen grand jury being convened to recall or levy criminal charges against the county employees. The cover letter asked the county officials to mail the signed petition back to Celebrating Conservatism. Docteur, one of the signers of the document, claimed the petition was not sanctioned by her organization.⁴

While Docteur and her group may not have accepted responsibility for the militia petition, Celebrating Conservatism did sponsor a full-page advertisement in the *Ravalli Republic* in early March. It featured signatures of people agreeing with a statement that they would stand up and “abolish” any government they deemed to be “hostile” to gun ownership. At her group’s “Second Amendment Declaration Rally” in March, Docteur told the media that the message that people are within their rights to resist, even overthrow, unjust government should be understood by everyone.⁵

Docteur and Celebrating Conservatism continue talking as though insurrection is becoming their only option. At a meeting in Libby, Docteur told the media, “Unfortunately for them [critics on the left], we’re not dangerous. We could be if we have to be, if provoked.”⁶ For the Human Rights Network, that sounds very similar to a message promoted by the Militia of Montana during the 1990s. The group used to make platitudes about using the ballot box, but always stressed their willingness to use the cartridge box at any given time.

Richard Mack, Militia Hero

Also set to speak at the “Liberty Convention” is [Richard Mack](#), a former county sheriff in Arizona and a hero to the “patriot” movement. He became a rising star in the militia movement during the 1990s when he sued the federal government over the Brady Bill, a gun control measure. He began speaking on the anti-government circuit in the early 1990s and never stopped. Mack’s lawsuit and speaking time on the “patriot” circuit became central issues during his 1996 re-election bid, and he didn’t even make it out of the primary.⁷

For the last year, he has toured the country trying to get sheriffs to read his new booklet, *The County Sheriff: America’s Last Hope*, and to adopt his brand of county supremacy. Mack’s version of county supremacy follows the tradition of the white supremacist Posse Comitatus. The Posse viewed the sheriff as the highest legitimate law officer in the land. It believed citizens were not subject to state or federal authorities. For the Posse, it was up to the sheriff to use force, if necessary, to prevent any perceived encroachment by federal institutions, especially when it came to tax and firearm regulations.⁸ Mack believes it is up to the sheriff and militias to save America from “utter despotism.” Before his recent revival as a “patriot” hero, he was selling cars in Arizona.⁹

Mack’s sympathy and support for the militia movement is well documented. He’s been called “one of the chief contact points between the NRA and the militias.”¹⁰ Following the Oklahoma City bombing in 1995 by a militia adherent, Mack

said, “People get all upset when they hear about militias, but what’s wrong with it? I wouldn’t hesitate for a minute to call out my posse against the federal government if it gets out of hand.”¹¹ In a 1996 article about the arrest of 12 members of the Arizona Viper Militia who were accused of plotting to blow up buildings, Mack told the press, “What I support and what I see in most militias is the type of courage to stand for freedom as exemplified by the Chinese students in Tiananmen Square.”¹² In 2004, he edited a book by Randy Weaver, whose standoff at Ruby Ridge, Idaho, was a seminal moment for the militia movement of the 1990s.¹³

Mack has appeared multiple times at events across Montana over the last year, including at Celebrating Conservatism meetings. More recently, he has been on the campaign trail in various states for a variety of candidates. Mack’s endorsements include Barry Hess, running for governor as a Libertarian in Arizona.¹⁴ In 2002, Hess admitted to owing the Internal Revenue Service \$47,000 in unpaid taxes. He claimed that the income tax is unconstitutional.¹⁵ Mack is also endorsing Kevin Calvey, a Republican running for the U.S. House in Oklahoma.¹⁶ In addition to Mack, Calvey has been endorsed by the Minuteman Civil Defense Corps, an anti-immigrant militia group. In April 2010, the Southern Poverty Law Center named Mack one of the 35 people “at the heart” of the resurgent “patriot” movement.¹⁷

Red Beckman, Anti-Semitic Tax Protestor

“They talk about the terrible holocaust of Hitler’s Nazi Germany. Was that not a judgment upon a people who believe Satan is their god? It was judgment, not holocaust... The true and almighty God used the evil Nazi government to perform judgment upon the evil Anti-Christ religion of those who had crucified the Christ.”— Martin “Red” Beckman in his book *The Church Deceived*.¹⁸

The above quote by Red Beckman is indicative of the type of speakers lined up for the “Liberty Convention.” Beckman has achieved the status of a patriarch in the anti-government movement. He was a pioneer of the anti-tax movement who lost everything for refusing to pay his income taxes. He’s been a favorite speaker on the anti-government “patriot” circuit for decades. “Liberty Convention” fliers state Beckman will tell “the truth about what is constitutional government....”

In 1985, Beckman co-wrote a book *The Law That Never Was*, which claimed that the 16th Amendment was not properly ratified and is a “monstrous fraud.” This is a common, but totally untrue, claim of the anti-tax movement.¹⁹ In May 1994, Beckman was evicted from his property near Billings, Montana, after a 20-year battle with the Internal Revenue Service for not paying his income taxes. Throughout his battle with the IRS, he claimed the judicial system did not have jurisdiction over him. His personal property was sold at auction, and his home was bulldozed to the ground.²⁰ In the lead up to his eviction, Beckman praised anti-government allies who threatened to kidnap the officials who were foreclosing on his farm. He told the press, “This [the eviction] isn’t going to go the way they [law enforcement] plan. There’s going to be enough guns here to make sure of that.”²¹

In addition to his tax protesting, Beckman follows Christian Identity, a religion based on a racist interpretation of the Christian Bible. It teaches that Jewish people are literal children of Satan, people of color are sub-human “mud people,” and that people of Northern European descent (white people) are God’s chosen people. Beckman has spoken at Identity events convened by Scriptures for America, an Identity church based in Colorado which is listed as a hate group by the Southern Poverty Law Center.²²

In a September 2009 presentation to Celebrating Conservatism, Beckman went on a tirade about how a citizen grand jury (a favorite idea of the “patriot” movement) should indict President Barack Obama.²³ He also promoted jury nullification, a “patriot” legal theory that jurors can “judge both the law and the evidence in the case before it.”²⁴ In essence, it allows juries to ignore laws and set defendants free regardless of evidence to the contrary. Like Mack, the Southern Poverty Law Center named Beckman one of the 35 people “at the heart” of the resurgent “patriot” movement.²⁵

Schaeffer Cox, founder of The Alaska Peacemakers Militia

A young, but radical, addition to the speakers’ list is Schaeffer Cox. Cox leads the Second Amendment Task Force in Alaska and is “commander” of a militia group called “The Alaska Peacemakers Militia.” The militia group holds firearm and survival training sessions. He first made a name for himself when he unsuccessfully challenged an incumbent in a state legislative Republican primary two years ago.²⁶

Cox has visited Montana to speak multiple times in the last year. While back home in Alaska, he has been arrested twice in the past few months –first for assaulting his wife and then for failing to notify a Fairbanks police officer that he was carrying a concealed weapon.²⁷ In March, the 26-year-old Cox was charged with second-degree felony assault for choking and punching his wife in front of their two-year-old son.²⁸ He ended up pleading guilty to a lesser charge of reckless endangerment and received a suspended sentence.²⁹ He has since bragged that there were 80 militia supporters ready to “storm the building” to protest the domestic violence charge.³⁰

Later in March, he was “monitoring” an arrest as part of his response to an alert from his “Liberty Bell” network. The network notifies other “patriots” if somebody believes their rights are being violated. The “patriots” receiving the alert are supposed to rally to the location where the supposed abuse is happening. While responding to an alert, Cox failed to tell an officer that he was carrying a concealed .38-caliber pistol. Cox pleaded not guilty to a misdemeanor charge of weapons misconduct. While the case is pending, Cox is barred from carrying a firearm.³¹

In a series of videos featuring Cox speaking to Celebrating Conservatism, he outlined his anti-government views. During his description of how to use the Liberty Bell network, he used the example of 500 “patriots” showing up when someone is pulled over by the police.³² If they follow Cox’s example, armed “patriots” descending on law enforcement personnel would put officers in a precarious position.

Gary Marbut, founder of Montana Shooting Sports Association

Gary Marbut leads the Missoula-based Montana Shooting Sports Association. During legislative sessions, with the spotlight shining on him, Marbut professes to be an advocate for public safety, hunters, and shooting sport interests. However, he fits squarely within the anti-government “patriot” movement. “Liberty Convention” fliers tout Marbut has somebody who “took on the Feds” over gun rights and won.

Marbut has offered organizing tips to the Militia of Montana, and the Militia of Montana has circulated membership and fundraising appeals for the Montana Shooting Sports Association, in addition to promoting weapons training classes offered by Marbut’s group.³³ Marbut has frequently supported militia-based conspiracy theories relating to one-world government. In an article published by the Militia of Montana, he wrote that Americans’ freedoms were being reduced to “ease our assimilation into the global governance of the New World Order.”³⁴ Another example comes from an e-mail he distributed. Marbut warned that trade agreements were “all moves towards the New World Order and the coveted global government.”³⁵

Since the early 1990s, Marbut has asked candidates running for office if they endorse the Posse Comitatus inspired view of the supremacy of the county sheriff. Marbut questionnaires have asked if the candidate views the “county sheriff [as] the top law enforcement official in the county” and believes that federal officers should have to ask the sheriff’s permission before taking action.³⁶ Marbut’s 2010 questionnaire included the question about sheriff supremacy, in addition to other questions that specifically asked about supporting Richard Mack and the Oath Keepers, a national “patriot” group.³⁷ Marbut has also drafted legislation to implement sheriff supremacy, which can be found under “Good Bills” on one of his websites.³⁸ The bill has been introduced during previous legislative sessions.

In 1994, Marbut was so incensed by passage of a ban on assault rifles that he proposed that Montana secede from the union. He drew up a plan to repeal Article I of the Montana Constitution. When Republicans took control of Congress in November 1994, he withdrew his plan. However, he said the plan was still on his computer, and he has not ruled out re-introducing it.³⁹ In 2008, when Secretary of State Brad Johnson implied that Montana would secede from the union if the U.S. Supreme Court ruled that gun ownership wasn’t an individual right under the Second Amendment, he cited one of Marbut’s websites as justification.⁴⁰

Marbut uses traditional techniques in his organization’s political campaigns – endorsements, lobbying, voter guides, and letters to the editor. When these techniques are combined with rhetoric supporting Montana’s sportsmen, Marbut has a level of credibility in mainstream politics that is uncommon for most “patriots.” However, he continues to espouse the conspiratorial theories of his colleagues in the “patriot” movement. He sees “power-hungry” politicians in the United States working to take away citizens’ guns in order to facilitate the dreaded New World Order. The Second Amendment becomes the last line of defense against a tyrannical government– the same analysis used by the anti-government movement. For more on Marbut’s connections to the “patriot” movement, see the Human Rights Network’s [Shooting for Respectability](#).

Chuck Baldwin, former Constitution Party presidential candidate

Chuck Baldwin was the 2008 presidential candidate for the Constitution Party, which combines Christian fundamentalism with themes of the anti-government movement. He received only 0.15% of the popular vote. Baldwin is the founder and pastor of Florida's Crossroads Baptist Church, the host of a radio talk show, and a right-wing columnist. Celebrating Conservatism first brought Baldwin to Montana in June 2009.⁴¹

Baldwin left the Republican Party in 2004, just in time to get nominated as vice president on the Constitution Party's ticket that year. He claimed there were no longer differences between Republicans and Democrats. He complained that neither major party had any "intention of outlawing abortion-on-demand" and both were committed to "granting legitimacy to homosexuality." Baldwin said he joined the Constitution Party, because it shared his "pro-life, pro-liberty, and pro-constitution convictions."⁴²

During the 1990s, Baldwin used his radio show on the Christian Patriot Network to promote the militia movement.⁴³ He has also been involved with white supremacist neo-Confederate groups. The Council of Conservative Citizens (categorized as a hate group by the Southern Poverty Law Center) is the modern-day incarnation of the White Citizens' Council that supported segregation and opposed the Civil Rights Movement during the 1960s. Baldwin has been a contributing writer to the group's main publication, *Citizens Informer*.⁴⁴

His support of neo-Confederates is hard to miss. As one journalist wrote:

"Judging by his office stuffed with Confederate memorabilia, Bibles and a stuffed-and-mounted coyote he shot, Baldwin is about as pro-Dixie and pro-gun as he is anti-abortion. He says that flying the Confederate Flag—like bearing arms—is a means to identify with a culture that protests federal tyranny, expressed in Supreme Court decisions like *Roe v. Wade*, which legalized abortion in 1973."⁴⁵

Baldwin's support of anti-government conspiracy theories is also easy to see. In one column he wrote:

"I believe there is a conspiracy by elitists within government, Big Business, and academia to surrender America's independence and national sovereignty to a globalist New World Order. I believe the Council on Foreign Relations, Trilateral Commission, and Bilderbergers are especially culpable in this regard."⁴⁶

Earlier this year, he sympathized with a tax protestor who flew his plane into an IRS building. He claimed that "just about every American" could agree with the tax protestor's anger at the government. Like Beckman and Mack, Baldwin was named to the Southern Poverty Law Center's recent list of people "at the heart" of the resurgent "patriot" movement.⁴⁷

Kitty Werthmann, leader of South Dakota Eagle Forum

Kitty Werthmann is an 84-year-old native of Austria and the South Dakota state leader for the Religious Right's Eagle Forum. She has had a recent spike in her right-wing popularity because of her comparisons between current events and Adolph Hitler's Third Reich. Her credibility rests on her living for seven years under Nazi rule in Austria as a child.⁴⁸ The "Liberty Convention" flier promises Werthmann will draw "parallels between Austria under Nazi occupation and today's current events."

Advertisements for a *Freedom to Dictatorship* video featuring Werthmann stated she will help people "see we are walking the same path as the Nazis." The video cites as proof such things as women in the workplace, euthanasia, and rising unemployment. On the Eagle Forum website, Werthmann claims that liberals in America are promoting national identification cards and gun control, which she identifies as Nazi programs.⁴⁹

At the "How to Take Back America Conference" in September 2009, Werthmann claimed that universal healthcare, the Equal Rights Amendment, and increased taxes were signs of Nazism. She was asked by an attendee what people should do to stop America's drift toward Nazism. She exhorted people to not give up their guns and to buy more guns and ammunition. "Don't you dare give up your guns," she said. "Never, never, never!" This response was greeted by an audience member saying, "Give them [guns] back one bullet at a time."⁵⁰

At a South Dakota presentation for the state's Focus on the Family affiliate, she said that welfare became a "huge apparatus" under Hitler, where everyone had access to subsidized housing, food stamps, and other benefits. "That's called socialism," she told the crowd. She said that President Obama's remarks about "spreading the wealth" during his campaign were a sign that America was drifting towards Nazism and socialism.⁵¹

Conclusion

Celebrating Conservatism is just one of numerous entities that are part of the resurgent right in Montana. These groups are capitalizing on fear and resentment stemming from an unstable economy and a left-leaning, African-American president. Events like the "Liberty Convention" have two purposes. One is to preach to the choir and solidify Celebrating Conservatism's base. The other is the hope that the event will bring in new people, and the speakers will get the recruits up to speed on the latest "patriot" beliefs.

"Celebrating Conservatism clearly hopes to expand its influence by holding this event, and that isn't good for Montana communities" said McAdam. "Celebrating Conservatism and its allies are already fracturing communities and creating environments where only those who yell the loudest and have the most weapons feel safe. These are not the indicators of a healthy community or democratic process."

¹ *Missoula Independent*, May 13, 2010; *Valley Journal*, Jan. 21, 2010; *Western News*, Feb. 16, 2010

² Company Profiles and Company Information on Manta, "Primerica Financial Services, Hamilton, MT," May 14, 2010; *Missoula Independent*, Oct. 29, 2009.

³ *Ibid.*

⁴ *Ravalli Republic*, Jan. 15, 2010.

⁵ *Ravalli Republic*, March 3, 2010; *Ravalli Republic*, March 4, 2010.

⁶ *Western News*, Feb. 16, 2010

⁷ Daniel Levitas, *The Terrorist Next Door* (2002), pp. 309-310; Associated Press, May 26, 1999.

⁸ James Ridgeway, *Blood in the Face* (1991), pp. 109-141; Montana Human Rights Network and Coalition for Human Dignity, *Racist to the Roots: John Trochmann and the Militia of Montana* (1995); Daniel Levitas, *The Terrorist Next Door* (2002).

⁹ *New York Times*, Feb. 16, 2010.

¹⁰ David Neiwert, *In God's Country* (1999), p. 332.

¹¹ Jack Anderson, *Inside the NRA* (1996), p. 84.

¹² Knight-Ridder News Service, July 3, 1996; Anti-Defamation League, "News About the Militia Movement," March 5, 1997.

¹³ *Idaho Observer*, April 2004; Leonard Zeskind, *Blood and Politics* (2009), pages 301-319.

¹⁴ Barry Hess for Governor, <http://www.hessforgovernor.com>, May 14, 2010.

¹⁵ *New York Times*, Oct. 23, 2002.

¹⁶ Kevin Calvey for Congress 2010, <http://www.kevincalvey.com/endorsements>, May 14, 2010.

¹⁷ Southern Poverty Law Center, "Meet the 'Patriots,'" April 20, 2010.

¹⁸ Martin "Red" Beckman, *The Church Deceived* (1984), p.42.

¹⁹ *Great Falls Tribune*, May 1, 1988; For more background on the anti-tax movement, see the Anti-Defamation League's "Tax Protest Movement," <http://www.adl.org/>.

²⁰ *Billings Gazette*, March 3, 1994; *Billings Gazette*, Aug. 20, 1994.

²¹ *Great Falls Tribune*, March 23, 1994; *Independent Record*, Jan. 22, 1994; *Independent Record*, Jan. 31, 1994.

²² Scriptures for America, "Who is True Israel and Who is Not," May 10-12, 1996; Center for New Community, "Hate Agenda of Labor Day 'Wisconsin Bible Camp,'" Aug. 20, 2001; Southern Poverty Law Center, map of hate groups, <http://www.splcenter.org/intel/map/hate.jsp>; Anti-Defamation League, *Extremism in America*, "Tax Protest Movement," <http://adl.org/>.

²³ Red Beckman, notes from presentation to Celebrating Conservatism, Sept. 15, 2009.

²⁴ Fully Informed Jury Association, *Juror's Handbook*, <http://www.fija.org>, July 12, 2001.

²⁵ Southern Poverty Law Center, "Meet the 'Patriots,'" April 20, 2010.

²⁶ *Fairbanks Daily News-Miner*, March 19, 2010; *Fairbanks Daily News-Miner*, April 11, 2010.

²⁷ *Juneau Empire*, April 12, 2010.

²⁸ State of Alaska vs. Schaeffer Cox, Affidavit by Police Officer, Case Number 4FA-10-762.

²⁹ *Juneau Empire*, April 12, 2010.

³⁰ *Fairbanks Daily News-Miner*, April 11, 2010.

³¹ *Fairbanks Daily News-Miner*, March 19, 2010; *Fairbanks Daily News-Miner*, March 20, 2010.

³² "The Solution part 6 of 11," http://www.youtube.com/watch?v=dDw_NL3RQJ8&feature=related.

³³ Militia of Montana, E-mail Alerts, Jan. 3, 2000; Nov. 23, 1999; March 20, 2002; Nov. 15, 2001; Feb. 21, 2003; and April 9, 2003.

³⁴ Militia of Montana, *Taking Aim*, April 1998.

³⁵ Montana Shooting Sports Association, e-mail, April 17, 2000.

³⁶ *Missoulian*, Sept. 18, 1992; Montana Shooting Sports Association, 2010 Sheriff Candidate Questionnaire.

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- ³⁷ Montana Shooting Sports Association, 2010 Sheriff Candidate Questionnaire, <http://www.progunleaders.org>.
- ³⁸ Gary Marbut, website, <http://progunleaders.org/GoodBills>.
- ³⁹ *Ravalli Republic*, Sept. 6, 1994; *Missoula Independent*, June 1, 2000.
- ⁴⁰ Montana Secretary of State, press release, Feb. 19, 2008; <http://progunleaders.org/Heller/>.
- ⁴¹ Atlas of US Elections, 2008 Presidential Results; *Sierra Times*, "Why I Joined the Constitution Party," July 28, 2004; *Missoula Independent*, Oct. 29, 2009.
- ⁴² *Sierra Times*, "Why I Joined the Constitution Party," July 28, 2004.
- ⁴³ Anti-Defamation League, "Beyond the Bombing," 1995.
- ⁴⁴ Center for New Community, *Party Crashers: White Nationalists and Election 2000* (2000), pp. 13-14; Southern Poverty Law Center, map of hate groups, <http://www.splcenter.org/intel/map/hate.jsp>.
- ⁴⁵ *Miami Herald*, Aug. 31, 2003.
- ⁴⁶ News with Views, May 7, 2010.
- ⁴⁷ News with Views, Feb. 19, 2010; Southern Poverty Law Center, "Meet the 'Patriots,'" April 20, 2010.
- ⁴⁸ *Worldnet Daily*, Sept. 22, 2009; Eagle Forum, website, <http://www.eagleforum.org>, "State Leaders," May 12, 2010; *Dakota Voice*, Nov. 12, 2009.
- ⁴⁹ The Prophecy Club, "Freedom to Dictatorship in 5 Years," May 12, 2010; Eagle Forum, "Freedoms Can Disappear in a Hurry if We Aren't Careful," 2003.
- ⁵⁰ Anti-Defamation League, *Rage Grows in America* (2009), p. 11; *The Washington Independent*, Sept. 28, 2009; Think Progress, "Right-Wing Conference Tells Activists to Get Their Guns Ready for 'Bloody Battle' with Obama the Nazi," Sept. 28, 2009.
- ⁵¹ *Dakota Voice*, Nov. 12, 2009.