The Tea Party and the Muslim Brotherhood:
Who they are and How American News Media Gets it Wrong
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I. Introduction

It is no secret that news media play an enormous role in the focus of the American people. Unfortunately, they tend to focus people in a way that is misleading or unnecessarily controversial. The Muslim Brotherhood is a Muslim social movement and political organization founded in Egypt in the early 20th century. Although American news media have enjoyed demonizing it, the Muslim Brotherhood is a relatively moderate, pragmatic group that is not afraid to compromise for the sake of the process. The Tea Party, on the other hand, is an American social movement and political organization founded in early 2009. The movement arose in response to a widespread fear that liberal policies were harming the United States and disenfranchising Americans. The group frowns upon compromise and in large part seeks to apply Christian values to government.

American media do not entirely love the Tea Party, but it prefers it over the Muslim Brotherhood—an organization that news media have, on more than one occasion, associated with terrorism. A side-by-side comparison of the two groups, however, shows that American media is improperly portraying the two groups: the Tea Party, not the Muslim Brotherhood, is more extreme.

In comparing the two organizations, this paper discusses (1) the role of political parties and their roles in democracies; (2) the history and structure of the tea party; (3) the history and structure of the Muslim Brotherhood; (4) the inherent bias of news media; and (5) the respective portrayals of the two groups by American news media.

II. Defining Political Parties and their Role in Democracies

Before delving into the roles of the Tea Party and the Muslim Brotherhood in their respective societies and on the world stage, it is important to explain exactly what a political party is and how well these two social organizations fall within the definition.

A. Generally

At the most basic level, “[a political] party is a group organized to nominate candidates, to try to win political power through elections, and to promote ideas about public policies.”

They are institutions that have a life and a set of rules of their own, beyond that of their candidates.... Interested individuals can become active in them and help set their goals and strategies...These activists and organizations are central parts of the party, too.”

It is this collective effort that “help[s] bring voters to the polls” by

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2 *Id.*
promoting certain policies, creating loyal voters, and making “information about candidates easily accessible.\(^3\)

There is much more to political parties, however, than merely electing candidates (although, granted, elections are the driving forces). Political parties educate citizens on, not only candidates, but societal issues that those candidates are seeking to resolve. And once their candidates are in office, political parties play large role in governance. “The legislatures of 49 states and the U.S. Congress are organized along party lines.”\(^4\) “They compete with interest groups, other political organizations, and even the media in all [areas of education].”\(^5\)

**B. Structurally**

Political parties have three divisions: the party organization, the party in government, and the party in the electorate; each division plays a distinct and vital role to the functioning of the party system.

The party organization “includes party leaders and the activists who work for party causes and candidates.”\(^6\) This is the branch that manages political campaigns, seeks support from the electorate (for votes, volunteer work, and financial contributions), and manages issues in media. In essence, the party organization is strictly a marketing tool purposed with creating and maintaining the party in government via elections.

Similarly, the party in the electorate “...consists of the women and men who see themselves as Democrats or Republicans: citizens who feel some degree of loyalty to the party, even if they have never set foot in the party’s headquarters or met its candidates. [These are called] *partisans* or *party identifiers*...without [them] the party would have to work much harder to win and keep power.”\(^7\) These men and women are charged with upholding the party organization (through votes, volunteer work, and financial contributions) so that it may uphold the party in government. In laymen’s terms the party electorate is known as the party’s “base.”

The party in government “consists of the candidates for public office and those who hold office, whether elected or appointed, who share a party label...The major figures here are presidents, governors, judges, Congress members, state legislators, bureaucrats, mayors, and other local officials who hold the same party affiliation.”\(^8\) Although the party in government needs the party organization to thrive, and the party organization needs

\(^3\) *Id.* at 5-6.
\(^4\) *Id.* at 10-11.
\(^5\) *Id.*
\(^6\) *Id.*
\(^7\) *Id.* at 9 (emphasis original).
\(^8\) *Id.*
party in government to exist, these two branches are not always in sync. Sometimes, the party organization wants to replace one of its own office holders. The reasons for this can vary from a controversy surrounding the office holder, to just a simple change in the parties’ ideological alignment. Such political clashes break down party solidarity and can have broad effects on the organization’s effectiveness within the party electorate.

C. How the Tea Party and the Muslim Brotherhood Fit the Mold

Although neither the Tea Party nor the Muslim Brotherhood can be perfectly categorized as a political party, both largely fit into that classification. The greatest support for classifying the groups as political parties is evident in their respective party organizations. Both the Muslim Brotherhood and the Tea Party seek to indoctrinate followers and use those followers to elect officials who will shape public policy in their image. Both groups do this by funding candidates, media campaigns, lobbyists, and armies of volunteers. This method works because the party electorate consists of thousands of loyal members carefully tracking which candidate is endorsed by what group.

Neither the Tea Party nor the Muslim Brotherhood, however, is officially registered in their respective countries as political parties. Thus, the weakest argument for classifying the two groups as political parties is found within their party in government. Strictly interpreted, neither group has a party in government. Loosely interpreted, however, both groups have successfully invaded their governments’ offices by feeding officially established political parties with their own members (the Tea Party does this through the Republican Party, and the Muslim Brotherhood does this through the Freedom and Justice Party (which itself established)).

While the Tea Party has a “Tea Party Caucus” in the House, and Freedom and Justice Party members need not hide their affiliation with the Brotherhood, neither the Tea Party nor the Brotherhood is the official party of any candidate. Despite any official party establishment, however, many Republicans and all Freedom and Justice Party members are deeply loyal to the organizations that put them in positions of power.

III. Brief Descriptions of the Tea Party and the Muslim Brotherhood

The history of the two parties, along with an understanding of the governmental system in which they operate and their status within those systems, is vital to weeding out the truth about the parties so that the presence of news-media bias is more apparent.

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A. The Tea Party

1. History

One of the earliest instigators of the Tea Party movement was Rick Santelli, a CNBC on-air editor. On February 19, 2009, while on the floor of the Chicago Board of Trade and live on national television, Santelli unleashed a flurry of disapproval at the Obama administration’s “foreclosure relief plan, ending his rant with a call-to-arms of sorts: calling Americans to a ‘Chicago Tea Party.’” This was the match that started the fire. And that fire spread rapidly: “Conservative news outlets amplified the public attention grassroots Tea Partiers were receiving, and mainstream media outlets became transfixed by the spectacle.” The explosive energy driving the formation of the Tea Parties boiled into a march on Washington, D.C. on September 12, 2009. Between 60,000 and 70,000 people participated.

As of August 2011, 18% of Americans polled by the New York Times and CBS News considered themselves to supporters of the Tea Party. Twenty percent of Americans viewed the group favorably. These Tea Party supporters tended to be white, Republican, middle-aged married men. Contrary to popular conception, Tea Party supporters are generally financially better off (e.g., middle class) and more educated than average Americans. In other words, “Tea Partiers do not come from the groups that have borne the brunt of the recent U.S. economic crisis....”

In line with popular perception, 39% of Tea Partiers have identified as evangelical Christians. “The vast majority are looking at society and politics with the expectations, hopes, and fears of long-standing staunch conservatives.” In fact, according to a 2010 Gallup poll, 62% of Tea Partiers identify as conservative republicans (compared to 29% of Americans overall).

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11 Id. at 212.
14 Skocpol, supra at note 10, at 613.
16 Skocpol, supra note 10, at 531-532.
“What distinguishes Tea Party supporters more precisely are their very right-wing political views, even compared to other conservatives.”

According to a Pew Research survey, 88% of Tea Partiers “prefer a smaller government with fewer services, compared with 80% of all Republicans and Republican-leaning independents and 56% of all registered voters” and “87% of Tea Party supporters said government is almost always wasteful” compared to 79% for Republicans overall and 61% of all registered voters.”

Specifically, “[w]hile registered voters as a whole are closely divided on same-sex marriage (42% in favor, 49% opposed), Tea Party supporters oppose it by more than two-to-one (64% opposed, 26% in favor).” Further, only about 10% of Tea Partiers (versus 22% for overall voters) consider a path to citizenship for illegal immigrants as the best approach to immigration reform. And finally, while 45% of overall voters favor gun control, only 18% of Tea Partiers share the same view. Kicking this point home is the fact that 53% of Tea Partiers (versus 37% of all registered voters) said that their religious beliefs were the most important influence on their opinion of same-sex marriage.

But not all Tea Partiers identify as Republicans. In fact, 3% of Tea Partiers identified as liberal democrats, and in 2010 only 83% voted for Republican House candidates. Most Tea Partiers that avoid the Republican label, however, are not doing so because they are voting for Democrats. Rather, such Tea Partiers say the Republican party simply isn’t conservative enough.

This ideology illustrates why, since the Tea Party began infiltrating the Republican party, the party’s political alignment has shifted farther right. “As of early 2011, non–Tea Party Republicans were closer to independents and Democrats on many issues about public spending and the role of government than they were to Tea Party–oriented Republicans...” This is exactly how Tea Partiers want it. The Defense & Shield Tea Party website explains on its homepage that, “We determine [sic] to not allow the status quo republican party to co-op our organization, as it has other such organizations in our venue. Rather, we intend to influence the republican party toward change that it may more strongly embrace conservative values it claims to believe in, such as limited government, a

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18 Skocpol, supra note 10, at 542-543.
20 Id.
21 Id.
22 Id.
23 Id.
24 Skocpol, supra note 10, at 553-554.
26 Skocpol, supra note 10, at 572-573.
Part of the Tea Parties’ motivations for cutting against the grain is an overwhelming fear that the future is one of less jobs and counter productive economic policies.

Certain ultra-extreme views, while not believed by a majority of tea partiers, pervade the mindsets of the parties. For example, Oath Keepers “[expect the Obama Administration to declare martial law across the country and detain citizens en masse...” In preparation, they “…proclaim their readiness to engage in armed insurrection to counter this supposed threat from the federal government.”

One source of such extreme views may be sensationalistic news sources: According to a study performed by Emily Ekins, a graduate student at the University of California, “Tea Party supporters overwhelmingly watch Fox News (CBS 63% VATP 78%), and over half report watching hosted news programs (CBS 53%).” Perhaps more importantly, “According to the VA TP 48% of attendees watched or listened to Glenn Beck often, 28% sometimes, 16% rarely, and only 8% said never.” In fact, Tea Partiers are more than three times likelier to have a favorable opinion of Glenn Beck than non-Tea Party Republicans. “Among non-Tea Party Republicans, 59% say they “haven’t heard enough” about him to make a judgment.”

To make sense of this data, it is important to understand that Glenn Beck is a conservative television media personality who, “rose to nationally syndicated television and radio...with his knack for creating controversy... His radio and television programs contributed to the Tea Party protests that popped up around the country in the summer of 2009 in response to a proposed healthcare [overhaul]. Beck also spearheaded what he called the 9/12 Project, which he pushed as an effort to recreate the unity that had enveloped the country in the wake of the terrorist attacks.” While the 9/12 Project does not purport on its website to be a Tea Party movement, a quick look at the nine principles and twelve values (for which the organization is named) reveals general solidarity with Tea Party ideologies.

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28 Id. at 647.
29 Id. at 672-673).
31 Id.
32 Id. at 16.
33 Id.
35 The 9/12 Project, http://the912-project.com/about/the-9-principles-12-values/ (The nine principles are: “1. America Is Good. 2. I believe in God and He is the Center of my Life. God “The propitious smiles of Heaven can never be expected on a nation that disregards the eternal rules of order and right which Heaven itself has ordained.” from George Washington’s first Inaugural address. 3. I must always try to be a more honest person
Regardless of the cause, Tea Party extremism is one of the reasons for Tea Party fragmentation. While extreme social conservatism is commonly reflected in Republican candidates seeking votes (like Michelle Bachmann) and conservative pundits seeking viewers (like Glenn Beck), Tea Partiers, surprisingly, “...show diversity. Some Tea Partiers are social conservatives focused on moral and cultural issues ranging from pro-life concerns to worries about the impact of recent immigrants on the cultural coherence of American life, while others are much more secular minded libertarians.”

Libertarians are a bit more likely to be educated to the postgraduate level, and 28% of them have incomes over $100,000 a year, compared to 14% of socially conservative Tea Partiers. Libertarians are a bit younger (59 on average) than social conservatives (62 on average). And the libertarian Tea Partiers are more often from the West or Northeast, whereas social conservatives in the Tea Party more often live in the South. “The most striking difference between the two groups,” Ekins reports, “is that... libertarians are significantly and substantially less likely to attend religious services every week”—only 18% of libertarian Tea Partiers attend that regularly, compared to 54% of social conservative Tea Partiers.

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36 Skocpol, supra note 10, at 712-714.
37 Skocpol, supra note 10, at 727-732.
So while “most people who agree with the religious right also support the Tea Party….support for the Tea Party is not synonymous with support for the religious right.”\textsuperscript{38} In fact:

nearly half of Tea Party supporters (46\%) had not heard of or did not have an opinion about "the conservative Christian movement sometimes known as the religious right"; 42\% said they agree with the conservative Christian movement and roughly one-in-ten (11\%) said they disagree. More generally, the August poll found greater familiarity with and support for the Tea Party movement (86\% of registered voters had heard at least a little about it at the time and 27\% expressed agreement with it) than for the conservative Christian movement (64\% had heard of it and 16\% expressed support for it).\textsuperscript{39}

But the libertarian bend is not to be overstated. These numbers clearly illustrate the Christian rights dominance within the Tea Party. This dominance is further reflected in the fact that 62\% of people who agree with the conservative Christian movement also agree with the Tea Party, and 42\% of people who agree with the Tea Party also agree with the Christian conservative movement.\textsuperscript{40} More specifically,

“white evangelical Protestants are roughly five times as likely to agree with the movement as to disagree with it (44\% vs. 8\%), though substantial numbers of white evangelicals either have no opinion or have not heard of the movement (48\%). Three-in-ten or more of white Catholics (33\%) and white mainline Protestants (30\%) also agree with the Tea Party, but among these two groups at least one-in-five people disagrees with the movement.”\textsuperscript{41}

While the Pew Research poll shows that fractionalization is evident, and that the Tea Party cannot be labeled as synonymous with the Christian right, the numbers also show that the Christian right has an obvious and dominant sway on the ideological direction of the Tea Party movement. But regardless of whether the Tea Party is populated by Christian evangelicals or staunch libertarians--one thing is for certain: Tea Partiers are overwhelmingly more conservative than the general public (or even the Republican party).

2. \textit{The System in Which it Operates}

\textsuperscript{38} Clement, supra note 19.
\textsuperscript{39} Id.
\textsuperscript{40} Clement, supra note 19.
\textsuperscript{41} Id.
The framers of the United States Constitution sought a powerful yet safe government under which to unite. With this in mind, they crafted three branches of government, each designated with exercising specific powers independent from the other branches. The three branches are (1) the executive, (2) the legislative, and (3) the judicial.

**a. The Executive Branch**

In the most simplistic terms, the executive branch is the President, who functions as (1) the head of state; (2) the executor of laws enacted by Congress; and (3) the Commander-in-Chief of the armed forces. While the Vice President is also established in the Constitution as a member of the executive branch, her powers are minimal. Together, the President and the Vice President are chosen by a body of “Electors” to serve in synchronous four-year terms. The people of each state appoint these Electors.

The Constitution directly grants the President the power to

- a. sign or veto legislation passed by Congress (though Congress may override the President’s veto with a two-third’s vote from both houses.);
- b. appoint, with congressional approval, "Ambassadors, other public Ministers and Consuls, Judges of the supreme Court, and all other Officers of the United States, whose Appointments are not herein otherwise provided for, and which shall be established by Law;”
- c. "grant Reprieves and Pardons for Offenses against the United States, except in Cases of Impeachment;”
- d. command the army, navy, and state militias (with regard to the latter, only “when called into the actual service of the United States”),
- e. "with the advice and consent of the Senate, to make treaties, provided two thirds of the senators present concur."

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43 Federalist Papers (Alexander Hamilton) (explaining the structure of government under the constitution and the reasons for attempting to establish this structure).
44 U.S. Const. art. I, II, III.
45 U.S. Const. art. II, § 1, cl. 1, § 2, cl. 1.
46 *Id.* at cl. 4; see *The Federalist Papers No. 68* (Alexander Hamilton) (The Mode of Electing the President).
47 *The Federalist Papers No. 69* (Alexander Hamilton) (The Real Character of the Executive); U.S. Const. amend. XII.
48 *Federalist Papers 68*, supra note 46.
49 *Federalist Papers No. 69*, supra note 47.
50 *Id.*
51 *Id.*
52 *Id.*
The President additionally has the power to issue executive orders, which have the force of law.\textsuperscript{54}

The President must also “from time to time give to the Congress Information of the State of the Union, and recommend to their Consideration such Measures as he shall judge necessary and expedient.”\textsuperscript{55}

\textbf{b. The Legislative Branch}

“All legislative Powers” created by the Constitution, are “vested in a Congress of the United States, which shall consist of a Senate and House of Representatives.”\textsuperscript{56} Members of both the House and the Senate are elected by citizens of their states once every two and six years, respectively.\textsuperscript{57} While each state is entitled to two Senators, the number of House representatives is determined by each state’s population.\textsuperscript{58} The Vice President serves as the President of the Senate, but can only vote in the event of a tie.\textsuperscript{59}

Congress’s power to legislate is limited to the powers enumerated to it in the Constitution. “The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people.”\textsuperscript{60}

Generally, “[t]he Congress shall have Power To lay and collect Taxes, Duties, Imposts and Excises, to pay the Debts and provide for the common Defense and general Welfare of the United States; but all Duties, Imposts and Excises shall be uniform throughout the United States; To borrow Money on the credit of the United States.”\textsuperscript{61} The powers of Congress are vast and are enumerated in Section 8 of the Constitution. In some areas, the powers of the House and Senate are divided: the House, for example, has the exclusive power to create revenue bills (though the Senate may propose amendments) and impeach federal officials.\textsuperscript{62} In turn, the senate solely possesses the power to try impeachments of federal officials, authorize treaties, and confirm the President’s appointment of “Ambassadors, other public Ministers and Consuls, Judges of the supreme Court, and all other Officers of

\textsuperscript{53} Id.
\textsuperscript{54} Youngstown Sheet & Tube Co. v. Sawyer, 72 S.Ct. 863 (1952) (confirming the president’s limited power to authorize executive orders).
\textsuperscript{55} U.S. Const. art. II, § 3.
\textsuperscript{56} U.S. Const. art. I, § 1.
\textsuperscript{57} U.S. Const. art. I, § 2, cl. 1, § 3, cl 1.
\textsuperscript{58} U.S. Const. art. I, § 2, cl. 3.
\textsuperscript{59} U.S. Const. art. I, § 3, cl. 4.
\textsuperscript{60} U.S. Const. amend. X.
\textsuperscript{61} U.S. Const. amend. X.
\textsuperscript{62} U.S. Const. art. I § 8.
\textsuperscript{60} U.S. Const. art. I § 7, cl. 1, § 2 cl. 5.
c. The Judicial Branch

The Constitution vests “judicial Power of the United States...in one supreme Court, and in such inferior Courts as the Congress may from time to time ordain and establish.” Federal judges are appointed, not elected, and serve life tenures “during good behavior.” “In all cases affecting ambassadors, other public ministers and consuls, and those in which a state shall be party, the Supreme Court shall have original jurisdiction. In all the other cases before mentioned, the Supreme Court shall have appellate jurisdiction, both as to law and fact, with such exceptions, and under such regulations as the Congress shall make.” Article III has been interpreted to allow Congress to limit, but not expand, the jurisdiction of the Supreme Court.

Since the Constitution was ratified, Congress has passed numerous bills regulating the structure of the federal judiciary. The first was the Judiciary Act of 1789, passed by the first Congress. The Act, among other things (1) stipulated the number of Supreme Court justices; (2) created district courts with original jurisdiction to hear trials; (3) created circuit courts (comprised of judges from both the district courts and the Supreme Court) to hear appeals; (4) specified the various jurisdictions of the courts; and (5) specified regulations regarding the daily functioning of the courts. Since the Judiciary Act of 1789, Congress has passed numerous statutes, each time modifying the structure of the federal courts (from issues that can be appealed to the Supreme Court to the number of judges on the bench). However, the general composition (i.e., a district court, circuit court, and Supreme Court) has remained unchanged.

3. Official Status

When discussing the official status of “the Tea Party” in American politics, it is important to remember that there really is not single “Tea Party.” The Tea Party is a loosely knit association of dozens of independently managed organizations who share a
similar (though not identical) ideology. With that said, the vast majority of Tea Parties are not registered political parties promoting their own candidates for office. Consider this: according to TeaPartyConnect.com, there are 84 Tea Parties established in twenty five states; and that barely breaks the surface: the Tea Party Patriots claim to alone have over 3,300 affiliated groups.\textsuperscript{70} Even after filtering out the relatively minor groups, there are still six major Parties.\textsuperscript{71} In 2010, there were around “67,000 [Tea Partiers] in counties across America”\textsuperscript{72} Yet, despite thousands of groups and thousands more members, only one Tea Party has registered with a state as an official third party: the Tea Party of Florida. Instead of taking Democrats and “establishment” Republicans head-on, the vast majority of Tea Parties have functioned as an insurgency, overpowering “establishment” Republicans from the inside-out. Amy Kremer, co-chairman of Tea Party Express claims that this approach is, at least in part, due to a fear that “a third-party candidate...would split the vote and would guarantee reelection for Obama” and other Democrats.\textsuperscript{73}

Overall, the approach has worked well: After only three years, the “Tea Party Caucus” now consists of fifty-five members between the House and Senate (though, assuming Bachmann’s website is updated regularly, that number is down from 2011, when 60 members were in the House alone).\textsuperscript{74} And Tea Partiers aren’t backing down:

“Among 17 contested Senate races and in Texas [in 2012], more than half a dozen of the Republican candidates — or those currently running ahead in their primaries — are Tea Party-embraced...From Indiana, where Richard E. Mourdock recently toppled the veteran Republican Senator Richard G. Lugar, to Wisconsin — where two Tea Party candidates are slowly unmooring the Republican front-runner, former Gov. Tommy Thompson — to Nebraska,

\textsuperscript{70} Brian Bolduc, Should the Tea Party Think Third Party? Organizations are divided as to whether they should automatically support a Republican in 2012, National Review Online, (June 9, 2011 3:00 p.m.), http://www.nationalreview.com/articles/269255/should-tea-party-think-br-third-party-brian-bolduc.


\textsuperscript{72} Dante Chinni, Tea Party Mapped: How Big is It and Where is It Based?, Public Broadcast Station, (April 21, 2010 at 12:30 p.m.), http://www.pbs.org/newshour/rundown/2010/04/tea-party-how-big-is-it-and-where-is-it-based.html.


where Deb Fischer surprisingly beat out a more established Republican candidate, Tea Party-backed contenders are surging.\textsuperscript{75} 

At the same time “moderate Congressional members [are] fleeing the scene,” leaving a vacuum in the Republican party just waiting to be filled by the remaining Tea Party contenders.\textsuperscript{76} 

The insurgency strategy, however, makes some Tea Partiers uncomfortable: “‘A pledge of allegiance to the Republican party, or any other party, violates what the tea-party movement is all about,’ says Jenny Beth Martin, co-founder of Tea Party Patriots, in a statement...FreedomWorks, [Brendan] Steinhauser contends, is looking for ‘the most conservative candidate that can win.’ As for the current crop of candidates, he muses, ‘I don’t think it’s Newt Gingrich. I don’t know at this point if it’s Mitt Romney — probably not.’”\textsuperscript{77} While “We in the Tea Party believe in Republican principles of limited government, free(er) markets and limited foreign military adventures[, the Republican party has] elected Republicans who represent the problem — they just don’t follow their own principles.”\textsuperscript{78} Despite the appearance of internal contention between the Tea Parties’, the groups’ strategies for the 2012 elections have, with the single exception in Florida, leaned towards supporting Republican candidates.\textsuperscript{79} 

With that said, the overall Tea Party movement does, in many ways, fit into the larger category of a “political party,” as defined by above. In the Parties’ efforts to elect ideologically parallel candidates to office, the Tea Party seeks to educate the populace on the relevant issues that their candidates are seeking to resolve. In many ways, the Tea Party consists of the three branches that make up typical political parties: it certainly has the party “organization” (made up of the members who actively seek to promote the Tea Party, its message, and its candidates); it arguably has an electorate, which (while significantly overlapping with the Republican electorate) is made up of voters who intentionally seek out candidates ideologically aligned with their Tea Party; and it arguably has a “party in office,” which is made up of those Republican officeholders who are ideologically aligned with one Tea Party or another (and, in many instances, are part of the Tea Party Caucus).\textsuperscript{80}


\textsuperscript{76} Id.


\textsuperscript{78} Id.

While the official lines drawn by the official mainstream parties hide these branches, they are nonetheless practically relevant. Without the Tea Party, it is safe to say American politics would be different today.

B. Muslim Brotherhood

1. History

The Muslim Brotherhood has a much longer and more colorful history than the relatively young Tea Party. The Brotherhood was founded by Hasan al-Banna 84 years ago in Egypt (1928) as a social movement advocating Muslim principles.80 Today, the Brotherhood, “is at its core a middle-class missionary institution, led not by religious scholars but by doctors, lawyers and professionals. It has long sought to move Egypt toward a more orthodox Islamic society from the bottom up, one person and family at a time.”81

The Brotherhood “focused initially on serving the needs of the Muslim community and improving their levels of morality and religiosity, which can be referred to as the missionary activity of the organization.”82 Banna accomplished this goal by opening chapters “throughout the country - each running a mosque, a school and a sporting club - and its membership grew rapidly...By the late 1940s, the group is believed to have had as many as two million followers in Egypt, and its ideas had spread across the Arab world.”83

It was not until 1941 that the Brotherhood began supporting candidates in Egyptian elections. Around this time, Banna and other Brotherhood members began to militarize, participating in politically motivated anti-British bombings that eventually culminated in numerous high profile assassinations (and the attempted assassination of Gamal Abdel Nasser in 1954). Banna was murdered subsequent to the 1948 assassination of Prime Minister Mahmoud al-Nuqrashi, despite his vocal disapproval of the attack.84 Government forces were the suspected culprits. This was only the beginning of an increasingly acidic relationship between the Muslim Brotherhood and the Egyptian government; even the end of colonial rule in 1952--which ushered in the era of President Gamal Abdul Nasser and
initially hinted a peaceful alliance between the government and the Brotherhood—only worsened the situation.

An “electrifying speaker,” Nasser “embodied pan-Arabism - the dream of a united Arab nation stretching from the Atlantic to the Gulf.”85 Nasser “felt the power of Islamic institutions and values and tried to undermine them in favor of secular schemes....”86 After an attempt on Nasser’s life (for which the Brotherhood was blamed) in 1954, government cracked down on the group, leading to the death of six Brotherhood members and the arrest of, among thousands of others, Sayyid Qutb.87

Sayyid Qutb played one of the most important roles in the development of modern radical Islam. Qutb’s “writings are considered to have inspired the Brotherhood’s violent offshoot groups such as Islamic Jihad.”88 “Qutb’s work advocated the use of jihad (struggle) against jahili (ignorant) societies, both Western and so-called Islamic ones, which he argued were in need of radical transformation.”89 The Egyptian government assured Qutb’s place in history when, in 1965, they put him to death.90 It is these early acts, and early radicals like Sayyid Qutb, that led to the Brotherhood’s poor, extremist reputation among Western nations.91

It couldn’t have helped when the Muslim Brotherhood, in 1979, opposed the agreement with Israel that Anwar al-Sadat’s government formed during the Camp David Accords.92 Up until this point, Sadat’s government treated the Brotherhood favorably.93 After the Brotherhood’s opposition to the Camp David Accords, however, Sadat’s government began arresting Brotherhood members in droves.94 But by this time in the Brotherhood’s history, the more militant and radical members of the group had broken off to form their own organizations, leaving behind a relatively moderate Muslim Brotherhood. It was members from one of these groups that assassinated Sadat in 1981. Nonetheless, “The Brotherhood’s status as the mother organization of radical splinter groups led to

90 Id.
91 Id.
92 Stilt, supra note 88, at 77.
93 Id.
94 Id.
strong measures against it, even as actual Brotherhood involvement in these actions was unclear.\textsuperscript{95}

Hosni Mubarak, who succeeded Sadat, understood the threat posed by these militant groups. In response, he allied with relatively moderate Muslim groups (like the Brotherhood) to defend against this other radical groups.\textsuperscript{96} Unfortunately, for the Brotherhood, Mubarak’s kindness only lasted as long as the group was strategically advantageous. When Mubarak took office, the Brotherhood played only an extrinsic role in the official Egyptian government.\textsuperscript{97} In fact, while they had branches serving public needs throughout the country, Brotherhood members were banned from participating in public office.\textsuperscript{98} Not a group to back down, however, the Muslim Brotherhood’s leaders, formed alliances with the Wafd party in 1984, and with the Labour and Liberal parties in 1987, becoming the main opposition force in Egypt. In 2000, the [Muslim Brotherhood] won 17 seats in the People’s Assembly.

Five years later, the group achieved its best election result up to then, with independent candidates allied to it winning 20% of the seats.

The result shocked President Hosni Mubarak. The government subsequently launched a crackdown on the [Brotherhood], detaining hundreds of members, and instituted a number of legal "reforms" to counter their resurgence.\textsuperscript{99}

In 2007, under Mubarak’s regime, the Egyptian constitution was amended to state in pertinent part: “Citizens have the right to establish political parties according to the law. It is not permitted to pursue any political activity or establish political parties on the basis of a religious authority, a religious foundation, or discrimination on the grounds of gender or origin.”\textsuperscript{100} Independent candidates were also forbidden from running for president and anti-terrorism legislation gave the security forces sweeping powers to detain suspects and restrictions on public gatherings were introduced.\textsuperscript{101}
While Mubarak’s fears were somewhat justified in that the Brotherhood served as formidable opposition on the political battlefield, it is safe to say his reaction was comfortably draconian. By 1995, the Brotherhood was again the victim of government persecution: “The regime resorted to severe authoritarian methods of dealing with opposition, arresting hundreds of Brotherhood members and trying them in military, not civil, courts...The level of state coercion used to prevent success of the opposition was the highest during these elections, and at least fifty-one people were killed during two days of voting.”

Despite Mubarak’s actions, between 1995 and 2000 the Muslim Brotherhood continued to gain momentum and increase its representation within the legislature (even as it was continually banned from running as an official party).

2. The System in Which it Operates

Until December 15, 2012 when Egypt voted on a new constitution, country was governed under a constitution that had been enacted in 1971. While this constitution is no longer in affect, understanding it is vital to understanding the world in which the Muslim Brotherhood operated for 84 years. Like the government established by the U.S. constitution, the Egyptian government contains three branches consisting of the executive, the legislative, and the judicial. But while these branches appear superficially similar to their counterparts in the United States, they are, in fact, quite different. One significant difference is that Article 2 of the Egyptian constitution establishes Islam as the official religion of the state and principles of Shari’a law as the primary source of legislation.

a. The Executive Branch

Similar to the executive branch of the United States’ federal government, one primary figure of the executive branch of Egypt’s government is the President of the Republic. However, the president is not the “supreme” executor; that role is reserved for the cabinet.

i. The President

The President is elected by the people once every six years and is charged with, “lay[ing] down the general policy of the State and supervis[ing] its implementation in the manner prescribed in the Constitution” in conjunction with the governmental branch. The constitution grants the President numerous specifically enumerated powers:

102 Stilt, supra note 88, at 79.
103 Id.
104 Egypt Const. Art. 2.
Commander of the Armed Forces. “Supreme Commander of the Armed Forces. He shall have the authority to declare war, subject to approval by the People’s Assembly.”

Power to Conclude Treaties. With certain exceptions, the President of the Republic has the power to bind Egypt to international treaties.

Power of Appointment. Unlike in the U.S., where the President and the single Vice President share a four-year term, in Egypt, the President may select one or more vice presidents, define their powers, and relieve them of their post. The President is also designated with appointing a Prime Minister, civil and military officials and diplomatic representatives, and, in conjunction with the Prime Minister, deputy-prime ministers. With the exception of the Prime Minister, the President has the power to dismiss officials that he elects (although, with regard to the deputy-prime ministers, dismissal must be done upon consultation with the Prime Minister).

Issuance of Regulations and Decrees. Similar to how the President can issue executive orders, the President of the Republic “shall issue necessary regulations for the enforcement of laws, in such a manner that would not involve any modification, disruption, or exemption from enforcement.” The President shall also “issue regulations of discipline,” though such a regulation is undefined within the constitutional text. Even more dissimilar to the role of the President of the United States, the President of the Republic may, when it is necessary and the People’s assembly is not in session, pass decrees that have the full force of law. If the People’s Assembly is in session, such decrees must be submitted to the Assembly for ratification; if they are not submitted or are not ratified, the decrees retroactively cease to have any legal effect.

Declaration of State of Emergency. ”The President of the Republic shall proclaim a state of emergency in the manner prescribed by the law.” Such a proclamation must be submitted and approved by the People’s Assembly, must be for a limited period of time, and cannot be extended without the Assembly’s approval.

Grants of Amnesty. The President of the Republic shares a power similar to the U.S. President’s power to pardon. However, the Egyptian constitution does not mention a limit on pardoning impeachments.

The section of government reserved for the majority party consists of the Prime Minister, his deputies, and any other “administrators” that are necessary for the public interest. The government is charged with being “the supreme executive and administrative authority of

106 Egypt Const. Art. 140.
107 Egypt Const. Art. 141.
108 Egypt Const. Art. 144.
110 Egypt Const. Art. 149.
the State.” Together, the Prime Minister and his deputies makeup a “Cabinet.” Among other responsibilities, the Cabinet is charged with “lay[ing] down the public policy of the State” and its implementation; issuing “administrative and executive decisions in accordance with laws and decrees;” and preparing drafts of laws, decrees, and the general budget.

b. The Legislative Branch

The Egyptian legislature is bicameral, though, unlike the United States congress, far more powers are split amongst the two houses than are shared between them.

The People’s Assembly is the primary legislative organ of the State. It must be no less than 350 people “of whom at least one half shall be workers and peasants elected by direct secret public balloting. The definition of worker and peasant shall be provided by law.” The President may appoint up to ten legislators. Each Assembly member serves a term of five years.

The Shura Council is another element of the legislative branch. It is composed of 132 members who serve six year terms. Two-third’s of the members are elected via “direct secret public balloting, [and] half of [the members] must be workers and farmers.” The Council cannot be dissolved by the President, unless necessary; if dissolved, the President must call for new elections within sixty days of the dissolution. It has “the competence to make such studies and proposals as it may deem necessary promote national unity and social peace and to protect the basic constituents and supreme values of society, public rights, freedoms and duties.” The opinion of the Shura Council must be sought when considering proposals to amend the constitution; drafting laws that compliment the constitution; drafting general plans for social and economic development; considering peace treaties; considering alliances and treaties that affect the territorial integrity of the State or sovereignty rights. However, the Prime Minister and deputy-prime ministers are not held accountable to the Council.

c. The Judicial Branch

i. Generally

The judiciary is independent from the other branches of government, only subject to the authority of the law. The “law shall determine judiciary authorities and their

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111 Egypt Const. Art. 86.
112 Egypt Const. Art. 87.
113 Id.
114 Egypt Const. Art. 196, 198.
115 Egypt Const. Art. 196.
116 Egypt Const. Art. 204.
117 Egypt Const. Art. 194.
118 Egypt Const. Art. 195.
119 Egypt Const. Art. 201.
120 Egypt Const. Art. 165 – 166.
functions, organize the way of their formation, define conditions and procedures for the appointment and transfer of their members.”121 Of course, it is important to remember that the legislature creates the laws. Thus, while judges cannot be removed from office, they can be disciplined by “the law.”122 Court sessions must be held publicly or “on camera,” and decisions must be announced publicly.

ii. State Council

The State Council is “an independent judiciary body and shall have the competence to decide in administrative disputes, and disciplinary actions....The law...determine[s] its other competencies.”123

iii. State Security Courts

“The law shall regulate the organization of the State Security Courts, and define their competencies and requirement to be satisfied by those who occupy the office judge in them.” Art. 171. Law No. 105 established these courts in 1980.124 “They hear matters involving violations of ‘security’ measures in regular Egyptian law, which include economic crimes, certain political crimes, terrorism, theft of public money, espionage, and possession of explosives. The right to appeal a conviction in state security courts is limited to procedural grounds.”125 In 2003, the Egyptian government, under President Mubarak, eliminated the state security courts.126 “However, the exceptional powers given to the Public Prosecution under Law No. 105 of 1980, which established these courts, were reinstated through amendments to the Code of Criminal Procedures (CCP).”127 The courts under this amendment are known as the higher emergency state security courts.

iv. Higher Emergency State Security Courts

The higher emergency state security courts were established under Law No. 162 of 1958. They compose of “a separate court system in which violations of Egypt’s repressive emergency law are tried.... The President, rather than the public prosecutor, typically directs cases to these courts. Military judges, widely viewed as less competent and more susceptible to political pressure than civilian judges, often preside. There is no right of judicial appeal in these courts. Hundreds of civilians have been tried in the state security

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121 Egypt Const. Art. 167.
122 Egypt Const. Art. 168.
123 Egypt Const. Art. 172.
126 Id. at 8.
127 Id.
emergency courts since the early 1990s.” The government has been accused of “use[ing] these courts primarily to punish political activism and dissent, even when that dissent is peaceful…. [Law No. 162 also] gives the government extensive powers to suspend basic liberties, including arresting suspects at will and detaining them without trial for prolonged periods, permits the referral of civilians to military or exceptional state security courts.” The elimination of the State Security Courts has had the downside of leaving the powers of the Higher Emergency State Security Court unchecked.

3. Official Status

For decades the Egyptian government sought to keep the Muslim Brotherhood out of political office. During this time, the Muslim Brotherhood was, “an officially banned Islamist organization that long ago settled on a strategy of political participation.” “A religious and anticolonialist movement that became the wellspring of Islamist ideologies around the world, the Brotherhood was outlawed” and only “intermittently tolerated under Egypt’s longtime strongman, former President Hosni Mubarak.” The government’s persecution of the Brotherhood was largely motivated by the Egyptian secular elite’s fear that the Brotherhood would “impose an intolerant interpretation of Islam upon Egypt, repressing women and the country's Coptic Christian minority.”

It was not until the Arab Spring struck Egypt in 2010 that “Egypt's interim government...officially recognized the [Brotherhood’s] new political party, the Freedom and Justice Party.” The Brotherhood, however, gained far more than official status; the group “emerged after the revolution as the most powerful political force in the post-Mubarak era.”

In some ways, the Brotherhood’s approach to politics in Egypt is similar to that of the Tea Party. Both parties run on religious platforms and seek to end what they see as years of governmental oppression. As discussed above, although the Brotherhood is no longer banned from running for office, it continues to elect candidates through a subsidiary political party known as the Freedom and Justice Party. This technique is reminiscent of how the Tea Party elects candidates through the Republican party in

128 Id.
130 Id.
133 Shehata, supra note 132, at 33.
134 Muslim Brotherhood (Egypt), supra note 133, at 133.
America. The primary difference is that the Tea Party is in many ways a subsidiary of the Republican Party, while the Freedom and Justice Party was actually established by the Brotherhood for the direct purpose of electing their candidates.

But in many more ways than they are similar, the Brotherhood’s approach to politics in Egypt is antithetical to the ‘Tea Parties’ approach to politics in America. Egypt’s Muslim Brotherhood is organized around a central hierarchy that has “appointed prominent members of [the Freedom and Justice Party] to lead the party and forbidden Brotherhood members from joining any other parties.”135 The advantage of this structure is an organized, uniform front against any opposition; the disadvantage is the alienation of “some young members who participated in the uprising to overthrow former President Hosni Mubarak, only to turn around and discover their own leaders wielding heavy-handed tactics.”136

According to one reformist Brotherhood member, “‘The Brotherhood has two options. The first is to be a rigid organization that insists on having only one legal political manifestation, and in that case the Brotherhood would eventually collapse,’ he says. ‘The other is to be a more flexible organization, allowing different political manifestations and retreating from the political domain to the civil domain and operating in the background of society to shape ... social roles and so forth. In this case, it would grow more powerful. It would be able to capitalize as an organization on the social capital.’”137 This latter approach better resembles the Tea Parties’ approach to politics in America.

But just as the Tea Party has found success in factionation, the Brotherhood has found success in unity. Taking about forty percent of the vote, “the Muslim Brotherhood’s Freedom and Justice Party was the clear winner in the first voting held since the ouster of Mr. Mubarak, taking almost half the seats...In June 2012, the Brotherhood’s candidate, Mohamed Morsi, was declared the winner of the country’s first competitive presidential elections...Mr. Morsi resigned from the Brotherhood upon taking office, but clearly still shares its values.”138

IV. Inherence of News Media Bias

News media plays a vital role in the popular perception of national and global events, including those relating to the Muslim Brotherhood and the Tea Party. In order to

136 Id.
137 Id.
138 Muslim Brotherhood (Egypt), supra at 133.
understand why that is, it is important to understand the history and modern role of American news media.

A. History of News Media

Today, “the notion that journalism should be politically neutral, nonpartisan, professional, even ‘objective,’” pervades the American public’s understanding of journalism. The modern role of American news media, however, is vastly different than it was in 1776. “During the first two or three generations of the Republic such notions for the press would have been considered nonsensical, even unthinkable.” Journalism was supposed to “persuade as well as inform, and the press tended to be highly partisan.” This system worked fairly well because news organizations had yet to balloon into enormous, billion-dollar conglomerates that dominated the market; rather, the market was “fairly competitive” and, “if someone was dissatisfied with the existing choices, it was not impossible to launch a new newspaper.” Into the 20th century, however, “[t]he dominant newspaper industry became increasingly concentrated into fewer chains and...the economics of advertising-supported newspapers erected barriers to entry that made it virtually impossible for small, independent newspapers to succeed.” As the news-media became less competitive, (for the sake of increasing revenue) more sensationalistic, and more corrupt, the “persuade and inform” system began to crack.

Intense pressure by the public, and their political representatives, spurred on publishers’ intense efforts to ensure that their journalism appeared “neutral and unbiased.” From here there developed a “revolutionary and unprecedented notion of a separation of the editorial operations from the commercial affairs.” In short, the notion of “objective” journalism (i.e., “professional” journalism) was born.

Today objective journalism dominates the American public’s conceptions of quality journalism; it does not, however, dominate the news. Despite popular perception, “selectivity and subjectivity are unavoidable,” because “[d]ecision making is an inescapable part of the journalism process.” Inevitably, “some values have to be promoted when deciding why one story rates front-page treatment while another is

140 *Id.*
141 *Id.*
142 *Id.* at 27.
143 *Id.* at 28.
144 *Id.* at 27.
145 *Id.* at 29.
146 *Id.*
148 *Id.*
So rather than being truly objective, "objective" journalism merely "incorporate[s] certain key values into the professional code" under the belief that "by following professional codes they are neutral and fair."150

This code, however, is seriously flawed; for one, "professional journalism regard anything done by official sources, e.g., government officials and prominent public figures, as the basis for legitimate news."151 This gives "those in political office (and, to a lesser extent, business) considerable power to set the news agenda by what they speak about and, just as important, what they keep quiet about...Political journalism has often degenerated to simply reporting what someone in one party says, and then getting a reply from someone on the other side of the aisle..."152

The most blatant problem with this form of journalism is that, "crucial social issues like racism or environmental degradation [falls] through the cracks...unless there [is] some event...to justify coverage, or unless official sources [want] to make it a story so they could talk about it repeatedly."153 A random sampling of 2,850 stories from the *New York Times* and *Washington Post* found that 78 percent were based largely on statements by public officials. In *Time* and *Newsweek* 20 percent of the news column inches were given to the president alone.154

Because journalists must rely on these official sources to appear objective, they often avoid criticism of these sources for fear of being cut-off.155 So perhaps a more pragmatic definition of "journalistic objectivity is the acceptance of a social reality shaped by the dominant forces of society--without any critical examination of that reality's hidden agendas, its class interests, and its ideological biases."156

To make matters worse, news organizations generally try to avoid stories that work against the interests of their advertisers,157 "With mass advertising, the daily newspaper has grown to a bulky size."158 "[N]ews organizations are privately owned, profit-making corporations" whose primary purpose is to make money.159 The "cultural order" within a newspaper is not independent from the corporate system.160 As such, information that works against the corporate culture, such as anti-capitalist or pro-labor messages, are

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149 McChesney, supra note 140, at 30.
150 Id. at 31.
151 Id. at 31-32.
152 Id.
153 Id. at 33.
154 Parenti, supra note 148, at 52.
155 Id.
156 Id.
157 Parenti, supra note 148, at 35.
158 Id. at 71.
159 Id. at 211.
160 Id. at 212.
either ignored or (if that is impossible) muted.\textsuperscript{161} In other words, the press is not the bold, watchdog that it is imagined to be; rather, it is a cowardly lion that mostly covers issues safe from negative repercussions.\textsuperscript{162}

Even the types of advertisements that newspapers are willing to print are impacted by the largest source of revenue. “\textit{[O]ne-third of all corporate advertising is directed at influencing the public on political and ideological issues as opposed to pushing consumer goods.}”\textsuperscript{163} This means that newspapers shy away from liberal-minded, anti-big-business rhetoric in order to avoid offending their primary sources of income. “No newspaper would run an advertisement pointing out that capital cannot build an industry, plant, or commodity without labor, and that when labor takes off” because that message would offend the larger, more valuable advertisers. “\textit{Dissident organizations seldom gain access to mass media advertising….Liberal minded commentators have been refused radio shows even when they had sponsors who would pay.}”\textsuperscript{164}

To make matters worse, advertisers are not the only cause of conflicting motivational interests within corporate news media. Always seeking more informational sources, news media outlets often cut deals with public officials: more information in exchange for more favorable treatment.\textsuperscript{165}

Granted, news media do regularly criticize businesses and government officials when scandals arise, but only once it is evident that the public would not except anything less.\textsuperscript{166} When they do criticize their sources of money and information, they treat the wrongdoings as isolated events.\textsuperscript{167} It can be inferred that modern journalism has become, in effect, a reactive system, rather than a proactive protectorate.

\section*{B. Modern Role of Bias in Objective Journalism}

Studies and theories on the partisanship of modern “objective” news organizations abound. Michael Parenti writes in his book \textit{Inventing Reality: The Politics of News Media}, “\textit{The people who own the media conglomerates along with their directors and chief executive officers are drawn overwhelmingly from the ranks of the rich. Not surprisingly, nearly all of them are politically economic conservatives.}”\textsuperscript{168} He goes on to argue that these

\begin{flushleft}
\begin{enumerate}
\item[\textsuperscript{161}] Id. at 214.
\item[\textsuperscript{162}] Id. at 217 (describing how the press only began ridiculing Nixon once “\textit{his prestige and power [were] in dramatic decline and his attempts at media manipulation [were] more transparent than ever'}; for it was then safe to do so”).
\item[\textsuperscript{163}] Id. at 74.
\item[\textsuperscript{164}] Id.
\item[\textsuperscript{165}] Id. at 221 (describing how the Washington Post arranged to be given information from government officials in exchange for treating them favorably).
\item[\textsuperscript{166}] Id. at 217.
\item[\textsuperscript{167}] Id. at 221.
\item[\textsuperscript{168}] Id. at 33.
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conservative owners significantly pressure their editors to spin the news in a right-leaning context. According to Parenti, in the 1950's Joseph Pulitzer, publisher of the St. Louis Post-Dispatch, demanded that his liberal journalists take a friendlier approach to the McCarthy hearings and avoid the words McCarthy and McCarthyism.\footnote{Parenti also puts advertisers at the heart of news-medias’ biases, saying, “Advertisers will cancel ads when they feel the reporting reflects unfavorably on their own product or industry.”\footnote{Parenti provides numerous allegories of such influence:}}

Parenti also puts advertisers at the heart of news-medias’ biases, saying, “Advertisers will cancel ads when they feel the reporting reflects unfavorably on their own product or industry.”\footnote{Parenti provides numerous allegories of such influence:}

○ CBS President Frank Stanton stating, “Since we are advertiser-supported we must take into account the general objective and desires of advertisers as a whole.”\footnote{Id. at 35.}

○ Arthur Ochs Sulzberger openly admitting “that he urged his editors to favor the automotive industry’s position [on auto safety and pollution] so as not to ‘affect the advertising.’”\footnote{Id. at 36.}

○ Art Shields being cautioned “by his editor to report nothing that might offend the [an Ohio mill town’s] merchants and brewers: ‘We can’t live without their good will...’”\footnote{Id. at 35.}

○ A reporter being cautioned by her editor: “‘business is where the power is and we have to rub their back.’”\footnote{Id. at 36.}

To be certain, an allegory is only worth so many words, and Parenti is far from definitively correct in his cynical perception of modern reporting. A 2005 study by Tim Groseclose and Jeffrey Milyo that was published in Harvard’s Quarterly Journal of Economics found “a strong liberal bias” in the news.\footnote{“All of the news outlets except Fox News’ Special Report and the Washington Times received a score to the left of the average member of Congress. And a few outlets, including the New York Times and CBS Evening News, were closer to the average Democrat in Congress than the center. These findings refer strictly to the news stories of the outlets. That is, we omitted editorials, book reviews, and letters to the editor from our sample.”\footnote{Surprisingly, despite accusations that National Public Radio (“NPR”) is a liberal-propaganda machine, it leaned less to the left than the New York Times and was about tied}}

\footnote{Tim Groseclose & Jeffrey Milyo, A Measure of Media Bias, 120 Oxf. Quarterly Journal of Economics 1192 (2005).}
with Times, Newsweek, and U.S. News and World Report.\textsuperscript{177} Perhaps more surprising is that the Drudge Report, commonly considered a conservative-propaganda machine, was placed “approximately in the middle of our mix of media outlets and approximately as liberal as a typical Southern Democrat, such as John Breaux (D-LA)...Although the conventional wisdom often asserts that the Drudge Report is relatively conservative, we believe that the conventional wisdom would also assert that—if confined only to the news stories to which the Report links on other web sites—this set would have a slant approximately equal to the average slant of all media outlets, since, after all, it is comprised of stories from a broad mix of such outlets.”\textsuperscript{178}

Again, however, these results are far from definitive; Groseclose and Milyo measured the ideological alignment of news programs against that of congressmen by counting and comparing the number of times each cited particular think tanks and policy groups. The flaw in this measurement is that it does not account for context of the citation. The strength is that it avoids measuring the personal biases of journalists and instead measures the biases of their articles.

What is evident after reviewing numerous studies on the bias of modern news media is that (1) no matter whether the mediums tend to lean left or right on the political spectrum, they are always leaning one way or another; and (2) this truth has a practical effect on the public’s perception of just about everything.

V. New Media Portrayals of both Groups

With a solid understanding of the structure, history, and ideology of, both, the Muslim Brotherhood and the Tea Party, it only takes a quick examination of American news media to reveal a discrepancy in their treatment. The self-proclaimed “objective” American news media is far more critical of the Egyptian Muslim Brotherhood than it is of the American Tea Party. While it is possible that news media generally displays an avid disapproval of the Tea Party, it is far more evident that news media displays a severe outright fear and demonization of the Muslim Brotherhood.

A. Portrayal of the Tea Party

On May 13, 2012 the popular television situation comedy Family Guy aired an episode that portrayed the Tea Party as unintelligent revolutionaries who ironically establish a new government identical to the one they’re replacing.\textsuperscript{179} Jon Stewart, host

\textsuperscript{177} Id. at 1213 - 1214.
\textsuperscript{178} Id. at 1214-1215.
\textsuperscript{179} Tea Peter, IMDB, (May 13, 2012), http://www.imdb.com/title/tt2040798/.
of The Daily Show, which narrates and satires the political arena, once famously parodied Tea Party advocate Glenn Beck.\textsuperscript{180} And Saturday Night Live, a hit television sketch comedy, has taken shots at the dress-wear and intelligence of Tea Party protesters.\textsuperscript{181} It is relatively easy to find examples of popular mass media portrayals of the Tea Party (generally) as extremist, radical, or even silly. The news media, however, is a different story.

While U.S. news media attempts to practice objective journalism, bias always manages seep through the cracks. Editorial decisions on what is news-worthy combined with journalistic decisions on what authorities are worth citing make bias inevitable. With this in mind, the bias of news media in reporting on the Tea Party becomes instantly evident. But what stands out is not the bias (as all news is inherently biased), but the multifarious nature of the biases: it is easy to find articles, both, in favor and opposed to the Tea Party.

A simple Google News search results in a first page that illustrates this point. One is an October 12, 2012 Fox News article titled Columbia University panel on Occupy, Tea Party was unbalanced affair, critic says and which begins, “A panel at Columbia University’s Graduate School of Journalism comparing the Occupy Wall Street and Tea Party movements was stacked with liberal journalists who offered one-sided conclusions, according to one alumnus who attended the event.”\textsuperscript{182} The article appears objective while simultaneously promoting the views of its source by not portraying the view of the event’s organizers.

USA Today published an article on November 20, 2012, titled Tea Party Fave Concedes Defeat, that unnecessarily mentioned, that Tea Party candidate Allen West “garnered headlines — and raised a lot of campaign cash — with controversial statements such as saying up to 80 House Democrats were communists and that President Obama’s supporters were a ‘threat to the gene pool.’”\textsuperscript{183} Meanwhile, it makes no mention of opponent Patrick Murphy’s 2003 arrest for disorderly intoxication. On the other hand, Bloomberg BusinessWeek published a similar article the very same day that mentioned

\textsuperscript{182} Joshua Rhett Miller, Columbia University Panel on Occupy, Tea Party was Unbalanced Affair, Critics Say, Fox News (Oct. 12, 2012), http://www.foxnews.com/us/2012/10/12/columbia-panel-on-occupy-tea-party-movements-was-unbalanced-affair-critic-says/.
West’s military service and Murphy’s arrest, but none of West’s controversial statements.\(^{184}\)

Despite the prevalence of both sides of the subjective spectrum, reports on the Tea Party, speculation that the Tea Party is misrepresented by a “liberal” media perseverses. Googling “news biased Tea Party” brings up a number of editorials questioning the liberal bias of various news outlets. John Kass, a columnist for the Chicago Tribune, accused “ABC’s George Stephanopoulos, once a top aide to former President Bill Clinton, and ABC reporter Brian Ross” of purposely mistaking a Tea Partier named John Holmes for the John Holmes responsible for the Batman movie massacre:

“What happened Friday fits into a theme being pushed of late by the political left and supporters of President Barack Obama:

That conservative groups opposed to the ever-increasing power of federal government are angry, that such anger is irrational, that conservative talk radio feeds the anger and therefore, criticism of Obama is dangerous. If only conservatives had the decency to calm down before a monumental presidential election in November, things would be so much nicer.”\(^{185}\)

An editorial in the Dayton City Paper argues that, “[t]his Dayton Daily News article about last evening’s tea party in Courthouse Square couldn’t be more biased. Lynn Hulsey goes out of her way to make the tea party look small, racist and extreme.”\(^{186}\) Perhaps most surprisingly, during the 2012 Republican primary, Newt Gingrich, speaking to a group of Tea Partiers, accused Fox news of “bias” and “distortion.”\(^{187}\) And he wasn’t alone: Rick Santorum, a Tea Party favorite during the primary, told a Fox News radio host, “He has Fox News shilling for him every day.”\(^{188}\)

With the exception of the latter accusation, most of these claims of liberal bias forget that Fox News, an avid Tea Party supporter, consistently ranks as the most


\(^{188}\) Id.
popular cable news network.\textsuperscript{189} With that kind of support, it is impossible to claim that the media is entirely slanted against the Tea Party. This, however, cannot be said of the Muslim Brotherhood.

\textbf{B. Portrayal of the Muslim Brotherhood}

According to Nathan Brown, a professor of political science and international affairs at George Washington University, “[i]f you were watching Fox on Monday, you’d be forgiven for thinking that Egypt was on the verge of being taken over by a pack of terrorists.”\textsuperscript{190} “Countless journalists, news articles, and pundits have painted a frightening picture of the Muslim Brotherhood as a violent, Islamic extremist organization on the brink of an Iranian Revolution style takeover of Egypt, imposing Shariah law, and going to war with Israel...it is clear that the segments of the western media that are portraying the Muslim Brotherhood as some sort of threat are not doing very good research or reporting.”\textsuperscript{191}

Examples abound: In an article illustrating Israel’s fear that anti-Israeli Egyptian government would rise from the ashes of Hosni Mubarak’s regime, the New York Times explained that Eli Shaked “feared that the only force organized enough to take over was the Muslim Brotherhood, which he described as anti-American, anti-Israel and anti-


peace.”¹⁹² The Times did not, however, attempt to explain the alternative viewpoint: that the Muslim Brotherhood is a relatively moderate group seeking the establishment of civil law, and is preferable to its competitor, the “ultra-conservative Islamist al-Nour party.”¹⁹³

Even a New York Times op-ed arguing that the Muslim Brotherhood’s Mohamed Morsi may lead to peaceful relations with Israel, qualifies with: “Have no illusions: the Muslim Brotherhood at its core holds deeply illiberal, anti-pluralistic, anti-feminist views. It aspires to lock itself into power and exploit a revolution it did not initiate.”¹⁹⁴

These claims contradict the Brotherhood’s history and its compromising message. For instance, the Muslim Brotherhood took it upon itself to apologize to the United States for the September, 11 riots outside of the U.S. embassy:

Despite our resentment of the continued appearance of productions like the anti-Muslim film that led to the current violence, we do not hold the American government or its citizens responsible for acts of the few that abuse the laws protecting freedom of expression.

In a new democratic Egypt, Egyptians earned the right to voice their anger over such issues, and they expect their government to uphold and protect their right to do so. However, they should do so peacefully and within the bounds of the law.¹⁹⁵

Yet, misconceptions of the Brotherhood are continually perpetuated by organizations like Fox News, which released a video on June 24, 2012 of a fiery sermon calling for a march on Israel, purportedly by Egypt’s newly elected President (and Muslim Brotherhood member) Mohamed Morsi. Just “one problem. The man in the video isn’t actually Mohamed Morsi. It’s the preacher Safwat al-Hegazy delivering an address in support of Morsi a few weeks ago. Morsi later distanced himself from

Hegazy’s remarks, saying ‘Jerusalem is in our hearts and vision. But Cairo is Egypt’s capital.’”

Other than profile pages on the New York Times, the British Broadcast Channel, and other biographical sources, it is relatively difficult to find a news article that portrays the depth, complexity, and relative modesty of the Muslim Brotherhood.

C. Rationale

Based on the understanding of professional journalism set-forth above, two simple yet logical conclusions can be inferred from the differences in media coverage of the Tea Party and the Muslim Brotherhood:

1. The Tea Party has ties to powerful public and corporate officials who may, if treated properly, provide news media with a substantial source of reliable income and information. The Muslim Brotherhood does not possess such ties in the United States, and those ties which it does possess may cause more harm than good to any news organization caught associating with them.

2. Resentment for the Tea Party has not reached the tipping point from which news media outlets determine the cost of muting criticism is greater than the cost of criticizing. Especially after the catastrophic attack on the World Trade Center on September 11, 2001, resentment in America for any group promoting Islamic values is enormous.

Constantly concerned about maintaining consistent streams of revenue and information, American news media outlets cannot afford the risk of portraying the Muslim Brotherhood as anything less than a terrorist organization. The Tea Party, on the other hand, has a significant amount of support in the United States. Such support means that news media outlets stand to profit from portraying the Tea Party in a friendlier light (and thus capturing additional viewership).

VI. Conclusion

A side-by-side comparison of the Muslim Brotherhood and the Tea Party has shown that the two groups have more similarities than differences: both emphasize the importance of religion in life and government; both have (at very least) a few proponents with ethically questionable viewpoints; both function practically as political parties within

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their respective states; both have been born into democracies (though the United States may be more loyal to the system than Egypt); and neither have established themselves as official political parties. The only significant difference between the two groups is the Muslim Brotherhood’s pragmatic willingness to compromise and sacrifice certain religious convictions for the sake of progress. When compared to its competitors on the Egyptian political battlefield, the Muslim Brotherhood appears moderate. The Tea Party, however, is uncompromising and extreme when compared to its competitors on the American political battlefield.

Yet, American news media has shown itself to not be structurally or ideologically capable of portraying the groups through anything but a carnival mirror. This is bound to continue until the Muslim Brotherhood starts to appear much more politically and financially advantageous to the capitalist American media moguls. In the mean time, it is best to stay well informed via multiple news sources from various international organizations.