
“If Abortions Aren’t Safe, Neither Are You:” A Mixed-Method Study of Jane’s Revenge and Other Post-*Dobbs* Militancy

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Abstract

Due to the US Supreme Court’s important policymaking role, landmark decisions can contribute to processes of radicalization or deradicalization. This article focuses on the impact of the *Dobbs v. Jackson Women’s Health Organization* decision on radicalization at the individual- or small group-level. In overturning *Roe v. Wade*, *Dobbs* held there is no constitutional right to abortion, thus permitting states to heavily restrict or ban the procedure. In the decades after *Roe*, anti-abortion terrorists killed at least eleven people in the US, including four physicians, and committed numerous bombings and assaults. In the months after a draft of *Dobbs* was leaked in May 2022, dozens of pro-life pregnancy centers and Catholic churches were targeted in arsons or vandalism attacks. An anonymous group calling itself Jane’s Revenge released communiqués claiming responsibility for some attacks and calling for “increasingly extreme tactics.” This article presents a mixed-method study of this new phenomenon. This includes building and analyzing a database (n=152) of post-*Dobbs* criminal incidents motivated by support for abortion rights, and examining communiqués authored by Jane’s Revenge or other militant pro-choice groups or individuals (n=20). Results are analyzed in light of radicalization theory, and prospects for future radicalization or deradicalization on both sides are discussed.

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Introduction

Since protecting abortion rights has been a priority of left-of-center activism for decades, it came as no surprise that the reversal of *Roe v. Wade* generated widespread protest. Perhaps less predictable, however, was the spate of arson and vandalism attacks against pro-life targets that began shortly after the leak of the draft *Dobbs* opinion. This nascent phenomenon presents an example of how US Supreme Court rulings can influence radicalization, particularly at the level of individuals and small groups involved in small-scale attacks. This

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mixed-method study of pro-choice militancy sheds light on how precisely this occurred, by empirically documenting the various actions and their stated justifications in communiqués, analyzing these results in terms of radicalization theory, and situating them in the context of the long-term struggle between the pro-choice and pro-life movements. While radicalization is the empirical focus of this article, prospects for potential deradicalization are also discussed.

Prior to the landmark *Roe v. Wade* decision in 1973, most states banned abortion, and only a few states allowed abortion without severe restrictions. In *Roe*, the Supreme Court held it was unconstitutional for states to outlaw abortion until viability (around 24 weeks). The pro-life movement, rendered unable to ban abortion through legislation, eventually branched into extremism. Since the late 1970s, anti-abortion extremists have committed hundreds of arsons, thousands of acts of property damage, and eleven murders (Jacobson and Royer, 2011).

Overturning *Roe* was a priority of the pro-life movement for decades. After the appointment of Justice Amy Coney Barrett to the Supreme Court, it was widely believed *Roe* would be overturned, and indeed, a draft of the *Dobbs v. Jackson Women's Health Organization* decision overturning *Roe* was leaked on May 2, 2022.

The *Dobbs* decision was released on June 24, 2022. The Court upheld a Mississippi law banning abortion after 15 weeks, and overturned *Roe*, along with *Planned Parenthood v. Casey*, holding that there is no constitutional right to abortion. Thus, after *Dobbs*, each state legislature can choose whether to permit, restrict or ban abortion, as was the case prior to *Roe*. Because access to abortion is regarded as a fundamental human right by a large proportion of the population, *Dobbs* sparked widespread outrage. Indeed, over 90% of Democrats who were polled disagreed with overturning *Roe*, as did the majority of Americans (Agiesta, 2022).

The first highly publicized act of anti-*Dobbs* property damage occurred in Madison, Wisconsin on May 8, 2022, when militants set fire to the office of Wisconsin Family Action, a pro-life lobbying group, and left graffiti reading, “If abortions aren’t safe, then you aren’t either” (Ploeg and Lathers, 2022). Dozens of other similar incidents occurred in subsequent weeks. Though this study is necessarily exploratory due to the novelty of this phenomenon, it analyzes all known post-*Dobbs* criminal incidents motivated by support for abortion rights

(n=152) and communiqués from responsible groups (n=20) to provide an initial mixed-method analysis in light of radicalization theory and in the context of decades of anti-abortion extremism. As a disclaimer, I should note that this article is not motivated by any particular position on abortion or by a normative agenda to justify or condemn post-*Dobbs* militancy. The purpose of this research is simply to document and analyze this new form of ideologically-motivated crime and outline prospects for future developments.

This article also refrains from weighing in on the debate about whether the term terrorism should be applied to an array of groups (such as the Earth Liberation Front or Jane's Revenge) that has never killed anyone. Even the term extremism might be contested in this case. Under some definitions, such as “a criminal act in order to achieve a political, social, economic, religious, or other distinct ideological goal,” post-*Dobbs* attacks might qualify (Becker, 2021: 1105). However, since some definitions of extremism require violence against people or authoritarian beliefs (Bötticher, 2017), I instead use the less-loaded term militant to describe these incidents and their perpetrators. By contrast, the term terrorism can certainly be applied to homicides by anti-abortion extremists.

Radicalization is typically defined as the process of adopting terrorist or extremist ideology (Kenyon et al., 2022). Despite definitional uncertainty, concepts from radicalization theory are still potentially relevant to any ideologically-motivated crime (such as freeing animals from cages (Nagtzaam, 2017)), and thus are employed as a way to analyze this phenomenon. While elements of radicalization theory that relate to justifying lethal violence may not be applicable, the remaining elements are relevant for explaining activists' adoption of illegal tactics. Moreover, radicalization theory can aid in analyzing texts by perpetrators to evaluate the potential for further escalation to more serious offenses.

Previous Research

The Supreme Court and Radicalization

While previous research has examined the impact of macro-political factors such as the party of the US president (Piazza, 2017) on terrorism, little research has analyzed the role of the US Supreme Court in stimulating radicalization or deradicalization. However, research

has shown how after years of failed attempts to legislatively overturn *Roe*, some activists became frustrated about the lack of legal avenues for change and turned to extremism (Fodeman, 2015). Thus, activists reacted to *Roe*, albeit in a delayed and mediated manner, by adopting extremism. This article seeks to extend these findings showing how, decades later, the reversal of the same decision led to militancy on the other side. Detailing how this occurred can shed light on how macro-level events shape the emergence of radicalism in cultural and historical context.

It is also possible, of course, that *Dobbs* could stimulate deradicalization among pro-life extremists, though, as discussed below, this remains uncertain. Extensive research has found that extremist groups can abandon extremism when their goals have been achieved, or when changes in political realities prompt extremist leaders to reevaluate their advocacy of violence (El-Said, 2012; Gunaratna & Ali, 2009; Harrigan & El-Said, 2012; Matesan, 2018; Murua, 2017). For example, one terrorist group was induced to reject violence by a power-sharing agreement giving militants government representation (Ashour, 2009). Similarly, perhaps in the wake of *Dobbs*, which enabled some states to ban abortion, some pro-life extremists will abandon illegal tactics.

Left-Wing Extremism and Terrorism

Beyond illustrating the role of the Supreme Court in abortion-related radicalization, this article builds on previous research about left-wing extremism, a topic that has long been relatively neglected. In part this is understandable, since in recent decades far-left extremism has caused far fewer fatalities than other forms of extremism (Koch 2018).

Much of the literature on left-wing terrorism focuses on the 1960s-era groups (some of which remained active until the 1980s), or the wave of anarchist assassinations in the early 1900s. There is some research, however, on animal rights extremism and so-called eco-terrorists, though as noted above many avoid using the term terrorism when the ingredient of murder is absent (Ackerman, 2003; Loadenthal, 2014). These latter two movements were most prevalent in the 1990s and early 2000s and have dissipated significantly since then (Michalski, 2019).

The factors driving left-wing extremism are not well understood, and the literature suffers from a lack of recent data about left-wing radical milieus (Radicalization Awareness Initiative, 2021). Koch (2018) finds that anarchist attacks are most common in Italy, Spain and Greece, and typically involve property damage, though bombings, arsons, assaults and shootings sometimes occur. In Italy, anarchists mainly committed vandalism and arson, but in the late 1990s progressed to bombings and assaults (Marone, 2015). Koch (2018) notes that the rise of far-right extremism often stimulates an increase in left-wing extremism in response.

Zuquete's (2014: 104) study of the black bloc (a protest tactic featuring black-clad militants damaging property) reports that participants are animated by an "emancipatory vision of violence, in which violence is the solution for individual despair," and a "cult of action that sees violence... as a weapon for individual transformation and social change." Loadenthal's study of anarchist communiqués (2017:14) from Greece and elsewhere concludes that anarchist subcultures subscribe to an "ethics of informality" and "voluntary association" and reject "institutionalized politics," instead favoring "unmediated attacks" on the state and capitalism, while forcing people to "consider the revolutionary analysis offered by their fiery communiqués."

Anti-fascist (or antifa) radicalism, which sometimes involves physically attacking fascists to prevent the spread of violent far-right ideologies, rose in popularity in 2017 after the Unite the Right far-right rally in Charlottesville, Virginia. Anti-fascism is a decentralized movement with no uniform ideology, and is composed mainly of local autonomous groups (LaFree, 2018). Anarchist beliefs are prevalent among anti-fascists, but communists and left-libertarians are also represented (Copsey and Merrill, 2020).

While most anti-fascists do not support violence against people, a radical subgroup within the movement does advocate physical violence against fascists (Logan and Ligon, 2021). These anti-fascists understand themselves as exercising considerable restraint in their violence, and do not advocate lethal attacks, though they tend to refrain from condemning the rare incidents in which an antifa member kills someone or attempts murder, such as the murder of Aaron Danielson by anti-fascist Michael Reinhoehl (Copsey and Merrill, 2020). Anti-fascist music often glorifies the murder of fascists, suggesting the possibility of lethal

violence (Koch, 2018). Copsey and Merrill (2020) note that some murders in Greece are believed to have been committed by anti-fascists.

Duran (2021) showed that left-wing extremist violence had increased in the previous five years (including 17 homicides during the Trump administration), though right-wing extremism remains responsible for more attacks and fatalities. Duran found that some of the left-wing attacks were directly in response to right-wing attacks, though the victims had no connection to the right-wing incidents. The Program on Extremism (2021), drawing on FBI data, identified only seven anarchism-related domestic terrorism incidents from 2015 to 2019, some of which involved planning mass-casualty attacks.

A study of the Earth Liberation Front shows that credit-claiming through sending communiqués serves several important functions, helping establish the ELF as a wider imagined community, inspiring people to form their own cells, outlining plans for future actions, and policing standards for expected behavior among fellow militants (Brown, 2020). For example, an interview with Daniel McGowan, convicted of terrorism charges for several ELF attacks, indicates that communiqués inspired his attacks. Autonomous cell-based movements, such as the ELF, involve independent groups forming their own cells. “[O]ne is ELF if they engage in ELF action,” as McGowan puts it (Brown, 2020).

The Program on Extremism (2021) notes that previous campaigns by anarchists have been sparked by macro-level events such as economic globalization, police killings and wars. Landmark U.S. Supreme Court rulings were not mentioned but can arguably constitute a similar example. More generally, due to the paucity of research on current left-wing extremism, this study can contribute to our understanding of left-wing militant activities and ideologies.

Abortion, Activism and Terrorism

There is a limited literature on anti-abortion terrorism. Most relevant to this study, Fodeman (2015: 169) found “anti-abortion protest rose and fell along a continuum of extremism in response to political frustrations,” such as the post-*Roe* inability of campaigners to ban abortion. Once the “valves of political participation” (2015: 181) were opened by court rulings allowing states to impose additional restrictions on abortions, anti-abortion violence

reduced. Similarly showing how frustrations lead to extremism, Freilich and Pridemore (2007) found that more anti-abortion attacks occurred where activists had failed to decrease abortions. Parkin et al. (2015) found that much of anti-abortion violence was against representative victims (like pro-choice protesters) rather than against purposeful victims, such as abortion doctors.

Of course, pro-choice activism has been almost entirely legal since *Roe*. The primary form of illegal activity has been to provide illegal abortions. Examples include the Jane Collective in pre-*Roe* America (Horwitz, 2017) and the Women on Waves movement providing abortions on boats near countries with abortion bans (Gomperts, 2002). Prior to *Dobbs*, pro-life activists occasionally reported vandalism against pro-life targets, often involving displays on college campuses (Ertelt, 2011), but pre-*Dobbs* incidents appeared to be rare. There is no academic literature documenting any militant pro-choice attacks on pro-life targets. Pro-choice militancy on a national scale, involving numerous attacks on pregnancy centers and the release of communiqués, is clearly a new phenomenon. Since *Roe*, pro-choice activism has instead been focused on a variety of legal activities, such as fundraising, litigation, escorting women into clinics, and protesting abortion restrictions (Rohlinger and Sessions, 2012).

Pro-choice advocates have denounced pro-life pregnancy centers (usually called crisis pregnancy centers or “fake clinics”) for many years, arguing that they mislead or confuse clients into thinking they provide abortions and convey inaccurate information about abortion to dissuade the “abortion-minded” (Thomsen and Morrison, 2020). Policymakers in some states have attempted to restrict or regulate their activities, though some of these attempts have been struck down by courts as unconstitutional (Strasser, 2019). There are over twice as many pro-life pregnancy centers as there are abortion clinics. Though she did not envision a campaign of vandalism, Thomsen (2022) recently argued that pro-choice activists should focus their activism on these centers to generate and sustain outrage among activists.

While some crisis pregnancy centers provide material aid to low-income women to help prevent abortion, staff at these centers see ultrasounds as key to their pro-life mission (Kissling et al., 2022). Pregnancy centers’ internal data purportedly found that they prevented

800,000 abortions between 2016 and 2020, and that viewing ultrasounds at their clinics dramatically reduced the chance of abortion (Gaul and Maxon, 2022).

Relatively little research has explored the role of beliefs about reproductive rights in left-wing subcultures. As Koehler notes, in far-left ideology, “[c]ontrol of the reproductive function of women’s bodies (e.g., criminalization of abortions) or stereotypical gender norms” such as a focus on raising children “are understood to be essential fundamentals of capitalism and a barrier to its removal” (Koehler, 2021a: 11). Thomsen and Morrison (2020: 720) also note that activists consider abortion “a requisite for sexual freedom.”

More generally, it is a common belief among Americans that abortion is part of the fundamental human right to bodily autonomy (Judge et al., 2017). This likely resulted from the legal and legislative battles between the pro-life and pro-choice movements in the decades after *Roe* (Rohlinger and Sessions, 2012), which regularly brought the topic to progressives’ attention and cemented the right to abortion as a core liberal belief held by a large proportion of the population. Since *Dobbs* held there is no such right, this could easily be interpreted to mean that the Supreme Court, and any states banning abortion, have lost their legitimacy because they no longer guarantee human rights. Indeed, some suggested that the US was no longer a democracy after *Dobbs* (Filipovic, 2022). Believing the government to be illegitimate or fundamentally unjust is an important predictor of political violence (Saucier et al., 2009). Thus, there is potential for mainstream liberals and feminists, and not just far-left radicals like anarchists who already advocate property destruction, to be attracted to pro-choice militancy in the post-*Dobbs* era. This also suggests that the causal link between *Dobbs* and militancy should be understood in the context of long-term identity-formation processes.

Radicalization Theory

Radicalization theory encompasses a variety of approaches to explaining why individuals become terrorists and why terrorism arises. Its concepts can be applied to militancy or other types of ideologically-motivated crime even if the term terrorism may not apply. Many of the most well-known theories focus on individual life experiences (de Coensel, 2018), and would thus be impossible to apply to pro-choice militancy, since little is known about the perpetrators.

Gøtzsche-Astrup's (2018) review of the evidence supporting various psychological models of radicalization found that certain elements, including small-group dynamics leading to ideological polarization, increased identification with a single group, and identification with sacred values, had the most empirical support. A scoping review of 148 empirical radicalization studies concluded that studies providing evidence for push factors, group dynamics, and rhetoric justifying violence through moral disengagement techniques were more prevalent than those documenting pull and personal factors (Vergani et al., 2018). A systematic review of radicalization risk factors noted that particularly strong predictors of radical behavior across studies included moral neutralization, a perception that an out-group has too much power, perceiving the law as illegitimate, and having highly similar peers (Wolfowicz et al., 2020).

One of the most empirically-grounded radicalization theories is that of Marc Sageman, as outlined in *Misunderstanding Terrorism* (2017). His identity-based perspective, based on hundreds of interviews with terrorists, argues that four elements tend to explain the emergence of terrorism, resulting from a relational process and the process of self-categorization. This includes escalating conflict between the protest community and the state, disillusionment with nonviolent protest, outrage at state aggression, and formation of a martial identity.

Another perspective arising from identity-based theories of social psychology focuses on the elements of extremist “texts that serve a morality-shifting, violence-necessitating function,” in particular “the notion that members of out-groups represent an existential threat to an in-group” (Ruddy, 2022: 4). Ruddy's (2022: 5) analysis shows how written texts by various types of terrorists reveal a process of demonization (ascribing “demonic or evil characteristics” to the out-group) in which the victim is framed as an existential threat that requires neutralization through violence. Some analysts also use neutralization theory or moral disengagement theory to understand extremist crime or analyze their stated justifications in communiqués or other written materials (Liddick, 2013; Blanco et al., 2022; Ruddy, 2022). These theories outline several mechanisms through which people justify criminal activity.

The process of deradicalization has not been theorized to the same degree, though it has been conceptualized as involving a “re-pluralization” process in which alternative non-violent means for addressing problems become accepted (Koehler, 2017). As noted earlier, a change in circumstances, such as a Supreme Court decision enabling state legislators to ban abortion, could potentially lead to deradicalization in the pro-life movement.

Though this study is necessarily preliminary and exploratory due to the novelty of pro-choice militancy and the lack of detailed information about perpetrators, the current study employs elements from radicalization theory to analyze both quantitative and qualitative findings about these post-*Dobbs* incidents. This can provide insight into militants’ thinking and the prospects for future escalation.

Data and Methods

A mixed-method, exploratory approach is appropriate for this study because it enables a multifaceted analysis of a nascent phenomenon that has not previously been studied, while drawing on the strengths of both quantitative and qualitative methodologies (Brent and Kraska, 2014). To accomplish this, a database of all known post-*Dobbs* criminal incidents motivated by support for abortion rights was constructed, and all communiqués or statements claiming responsibility for incidents were also compiled.

Only incidents that appeared to represent clear criminal offenses (such as damaging property or physically assaulting someone) were included in the database. It was not feasible to limit criminal incidents to cases in which criminal charges were filed, because few perpetrators have been caught. While the criminal justice system formally determines whether crimes have taken place, one can still ascertain with a great deal of confidence that a criminal offense such as vandalism, arson, or assault has occurred based on the known facts and the relevant statutes. Factors that would indicate the absence of criminal intent, such as permission by the owner or involuntary action by the perpetrator, appeared to be inapplicable in nearly all incidents. The one case in which self-defense might be at issue was included in the database because the perpetrator was charged with offenses and bound over for trial,

reflecting determinations by the prosecutor and judge that sufficient evidence existed that a crime was committed (Waldon, 2022).

Several strategies were employed to build the database of post-*Dobbs* incidents, including various Internet searches. These included using the Google News search engine and the NewsBank database, which includes content from thousands of newspapers and other media sources. Online lists of these incidents were also consulted. These include, among others, lists compiled by Life News (Bilger, 2022) and Catholic Vote (2022).

Each incident was confirmed through media coverage and any other available documentation (such as photographs or videos of the incident) before including it in the database. The theft of mass-produced yard signs was excluded because individual incidents were not recorded, and because these were extremely minor offenses (the signs cost less than a dollar each) (Rankin, 2022). In addition, many incidents on online lists were excluded because it was unclear whether support for abortion rights motivated the conduct. For example, a West Virginia Catholic church was burned to the ground by teenagers on the night *Dobbs* was released, but this was not included in the database because the perpetrators' motives remain unknown. Instances in which activists disrupted church services were included because this could violate a federal law against interfering with religious services (18 U.S.C. § 248) as well as other criminal statutes, such as disorderly conduct or disrupting a religious service (NY Penal Law 240.21).

Internet searches using a variety of terms were used to identify all communiqués or other statements claiming responsibility for the incidents in the database. Most of the communiqués were found on the Jane's Revenge blog. One communiqué was included even though its claimed attack on a pregnancy center donor remains unconfirmed, because its location (Portland, a frequent site of ideologically-motivated property damage) makes the claim plausible. Moreover, fact that the communiqué threatened and advocated future attacks makes it noteworthy enough to include in the analysis of other communiqués. Although the communiqué was included in the collection of communiqués, the claimed incident was not entered in the database.

To aid in determining the causal role of *Dobbs* on militancy, I attempted to identify instances prior to *Dobbs*. Attacks against pro-life targets were relatively rare prior to the

Dobbs leak and occurred to a large extent on college campuses. A dozen instances of vandalism, half of which involved pro-life signs on college campuses, were identified in 2021, and one arson of a crisis pregnancy center also occurred in that year (Bilger, 2021). While it is possible that a few of the post-*Dobbs* incidents might have happened even if *Roe* had never been overturned, it is clear that the vast majority were committed directly in response to *Dobbs*. This is supported below by showing the temporal proximity of attacks to *Dobbs*' release and analyzing the language of graffiti and communiqués.

Results

This section first presents a quantitative analysis of the database of post-*Dobbs* criminal incidents, and then engages in a qualitative analysis of the communiqués by Jane's Revenge and other groups.

Quantitative Analysis of Post-*Dobbs* Incidents

Results are presented through several tables showing the prevalence of different target types, incident types, and incident characteristics (Tables 1 through 3). In addition, the geographic and temporal distribution of incidents are displayed in Table 4 and Figures 1 and 2. Note that all incidents in the database took place between May 2 and December 10, 2022.

Table 1. Target Types in Post-*Dobbs* Pro-Abortion Rights Criminal Incidents (May-Dec. 2022)

Type	Number	Percentage
Pro-life pregnancy center	65	42.8%
Church	45	29.6%
Catholic	35	23.0%
White Protestant	7	4.6%
Black Protestant	2	1.3%
Mormon	1	0.7%
Pro-life organization or party	16	10.5%
Government (capitol, courthouse, police)	10	6.6%
Multiple (government, business, etc.)	3	2.0%
Individuals	11	7.2%
Other (museum art, Christian school)	2	1.3%
Total	152	

Table 1 illustrates the targets of the incidents. About 43% of all incidents targeted crisis pregnancy centers. Attacks on churches represented about 30% of all incidents. The vast majority were Catholic churches, presumably due to the Catholicism’s close association with pro-life activism. Two of the Protestant churches attacked were Black churches. One of the Black churches, in rural Mississippi, only had a few members, all elderly, and the pastor said he never discussed abortion (Pimpo, 2022).

About 11% of attacks were on pro-life organizations. About 7% of attacks were against government targets such as police, the state capitol, or a courthouse. Just 2% of all incidents were against multiple targets, such as when militants vandalized several businesses and government entities during a Portland protest. About 7% of attacks were against individuals. This includes, for example, a young Seattle woman holding a pro-life sign who was tackled and pepper-sprayed by a group of black-clad militants on June 24, the day *Dobbs* was released.

Table 2. Incident Types, Post-*Dobbs* Pro-Abortion Rights Criminal Incidents (May-Dec. 2022)

Type	Number	Percentage
Arson	5	3.3%
Attempted arson	6	3.9%
Other property damage	51	33.6%
Graffiti	107	70.4%
Assault	16	10.5%
Disruption of church service	5	3.3%
Disruption of other event	2	1.3%
Assassination/violence threat	4	2.6%
Shooting	1	0.7%
Cyberattack	1	0.7%

Note: Total exceeds 100% because some incidents included more than one type.

Table 2 shows the types of incidents in the database. Graffiti was present in 70% of cases, often accompanied by other forms of property damage (34% of all incidents). About 3% of incidents involved arson, and another 4% involved attempted arson. Three people were arrested for threatening a shooting in reaction to *Dobbs*. This includes Nicholas Roske, who was armed and planning to assassinate Justice Brett Kavanaugh. Another unidentified perpetrator left a note (signed “Jane’s Revenge”) for a Catholic priest in Nebraska, threatening a mass shooting at his church if an abortion ban was passed (KETV, 2022).

Assaults, mainly against pro-life protesters or canvassers, represent about 11% of incidents. One incident involved a cyberattack purportedly releasing sensitive data from the Arkansas and Kentucky state governments. Disruptions of church services represent about 3% of the incidents. The database includes one shooting, which was not fatal. This incident involved a 74 year-old Michigan man shooting an 84 year-old pro-life canvasser, Joan Jacobson, who was having a disagreement with the perpetrators' (pro-choice) wife.²

It should be noted that not every incident in the database necessarily reflects a radicalization process. It may be that some instances, such as the shooting, were relatively spontaneous rather than the result of an ideological transformation or deliberative decision to commit a crime to further ideological ends. Nevertheless, even graffiti and vandalism can reflect radicalization, since behavioral radicalization is often defined as involvement in extremist activity and extremism can be defined as engaging in crime for an ideological cause (Becker, 2021). Assaults could potentially result from radicalization, since some anti-fascists believe in physically assaulting fascists, and as seen below, some consider pro-life activists to be fascists.

Arson or attempted arson attacks, and explicit threats to commit violence against people, presumably indicate a qualitatively higher degree of radicalization than other incidents. Aside from posing a risk to human life due to fire's tendency to spread, arson attacks can be much more costly than vandalism alone. One pregnancy center reported spending \$400,000 to repair its facility and enhance security after an arson (Warren, 2022). That said, even graffiti and broken windows can cost over \$10,000 to repair (ACI Prensa, 2022), which can lead to significant prison sentences (for example, five years in Michigan) (Mich. Comp. Laws 750.377a).

² The man, who claimed he discharged the gun accidentally while trying to protect his wife, was charged with offenses (reckless firearm use and careless discharge of a firearm) which do not require intent to fire the rifle, as well as assault with a dangerous weapon (Waldon, 2022). This was included in the database because it was committed on behalf of a pro-choice individual involved in an ideological confrontation. The perpetrator called the victim a "right-wing nut," which may indicate that he shares his wife's views. Regardless, this incident seems qualitatively different from attacks claimed in communiqués, which were calculated to advance ideological ends and thus clearly exemplify radicalization.

Table 3. Characteristics of Post-*Dobbs* Pro-Abortion Rights Criminal Incidents (May-Dec. 2022)

Characteristic	Number	Percentage
Communiqué issued	21	14.5%
Threatening graffiti	33	21.7%
“If abortion isn’t safe, neither are you”	31	20.4%
Other threatening message	2	1.3%
Anarchist symbol	20	13.2%
ACAB/1312 Graffiti	4	2.6%
Jane or Jane’s Revenge mentioned	38	25.0%

Table 3 displays some relevant characteristics of the incidents. About 15% of all incidents were claimed in a communiqué. 22% of incidents involved graffiti of a threatening nature—that is, which appeared to threaten people. In nearly all cases, this consisted of some version of the phrase, “If abortion isn’t safe, neither are you.” Although this is an ambiguous phrase, the word “you” implies a threat to the personal safety of the individuals involved, since it is seldom applied to inanimate objects like buildings.

The threatening messages included in two incidents include one “Kill all Christian nationalists” and “Is overturning *Roe* worth your life or your democracy?” at one site, and “We’re coming for U” at another. “We’re coming for U” could possibly refer to future vandalism, but again, the second-person pronoun implies a threat against people.

In graffiti not mentioning Jane’s Revenge or their “If abortions aren’t safe” catchphrase, a variety of messages were displayed, such as “Not a clinic,” “Forced birth is murder,” “You’re anti-choice,” “Fund abortion, abort God,” “Girls just want to have fundamental rights,” “Abort the court,” “Fuck SCOTUS,” “Defend *Roe*,” and “God loves abortion.” Classic slogans like “My body, my choice” were also popular. A statue at the Catholic church memorializing fetuses terminated by abortion was vandalized with the message “In Memory of Women Who Die From Lack of Legal Abortion.” The phrase “Forced birth is murder” is significant because portraying one’s enemies as murderous is an important step in the radicalization process that might eventually justify murdering opponents (Ruddy, 2022).

An anarchist symbol—that is, an A with a circle around it—was present in 13% of the incidents. Other messages with anarchist content included “abort the st8” and “No church, no state, abortion is great.” Graffiti reading “abortion bans are fascist” was present in one

incident. ACAB, short for “All cops are bastards,” a slogan popularized during the George Floyd protests, or its numerical code 1312, was present in 4 cases, or about 3% of all incidents. Three of these four ACAB/1312 instances were in Madison, Wisconsin. Madison was also the only city in which the graffiti also referred to Native American children killed at residential schools. After revelations about deaths and mistreatment at such schools in Canada, arsonists attacked dozens of Canadian churches in 2021 (Dzsurdzsa, 2021).

Table 4. Geographic Distribution of Post-*Dobbs* Criminal Incidents (May-Dec. 2022)

Region	# of Incidents	Pop. (mill.)	% of US Pop.	% of Incidents	Ratio
Northwest	30	12.9	3.9%	19.7%	5.04
West	20	61.1	18.5%	13.2%	0.71
Midwest	43	69.4	21.1%	28.3%	1.34
South	27	120.6	36.6%	17.8%	0.49
East	32	65.4	19.9%	21.1%	1.06
Total	152	329.4			

Table 4 displays the geographic distribution of post-*Dobbs* incidents. The rightmost ratio shows the ratio of the region’s percentage of overall incidents over its percentage of the total US population, which captures whether the number of incidents is more or less than expected. The prevalence in the Pacific Northwest is five times higher than would be expected by the region’s population alone, perhaps reflecting the substantial presence of anarchist and anti-fascist activists in the region (Logan and Ligon, 2021; Williams, 2009).

The Midwest has 34% more attacks than would be expected based on its population. Seven of the incidents (5% of the total) were in Kansas, even though Kansas has less than 1% of the US population. This is likely attributable to the fact that Kansas voters decided in August 2022 whether to override a state supreme court decision establishing a constitutional right to abortion (Rankin, 2022). This suggests that more incidents may occur in the future around elections important for abortion rights. Notably, the first “Jane’s Revenge” attack occurred in the Midwest as well. This may be connected to the long history of left-wing politics in Madison (Nichols, 2012), as well as to the fact that Wisconsin is a swing state with many liberal voters and yet a near-complete ban on abortion (Associated Press, 2022).

Figure 1. Number of Post-*Dobbs* Pro-Abortion Rights Criminal Incidents by Month, 2022

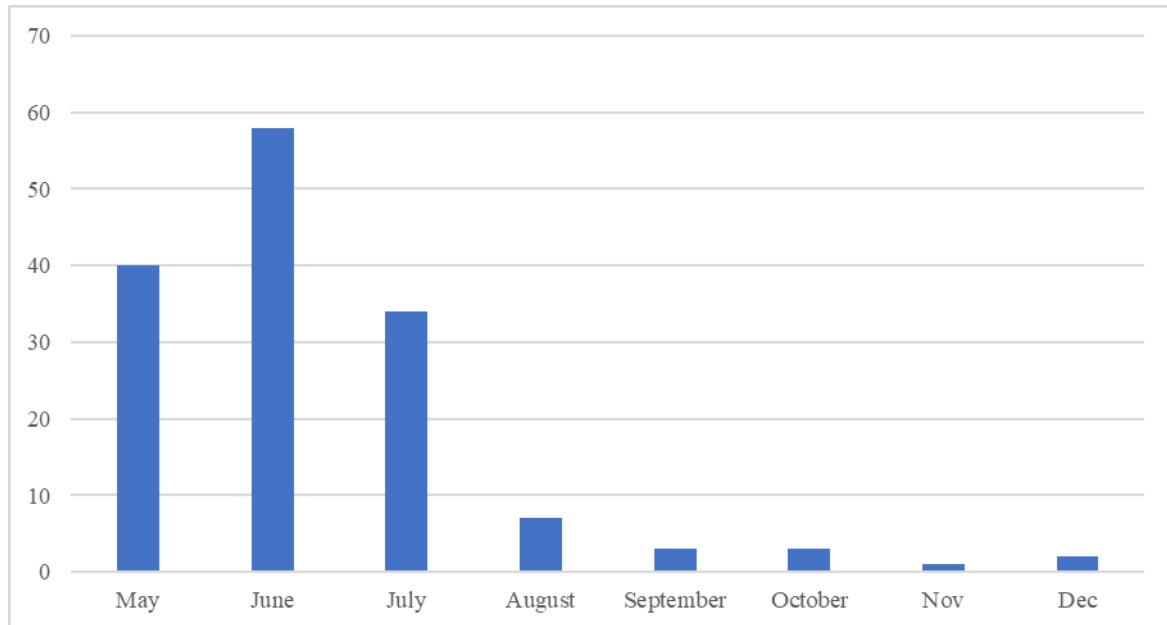
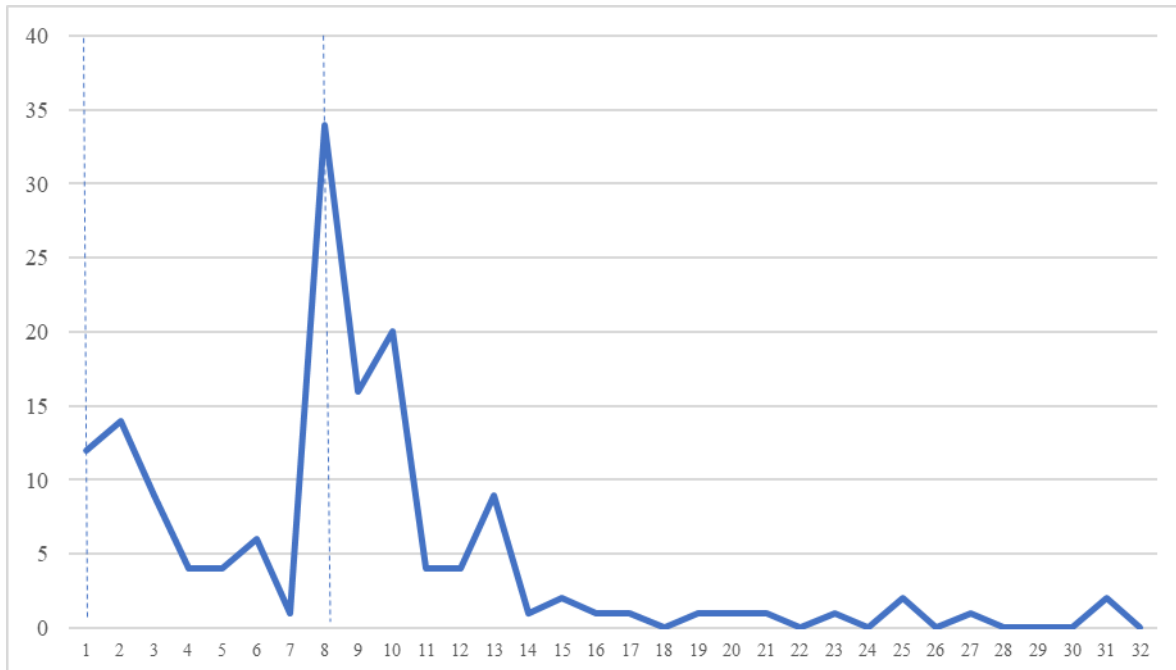


Figure 1 shows the number of post-*Dobbs* incidents by month. The number of incidents peaked in June 2022 and trended downward in subsequent months. About 86% of all incidents occurred in May, June and July 2022. Notably, 61% of all incidents occurred in the two weeks after the *Dobbs* leak or the two weeks after *Dobbs*' release. 73% of incidents occurred within three weeks after the leak or decision.

To provide a more fine-grained analysis of the temporal proximity of incidents to *Dobbs*, Figure 2 displays the number of incidents per week, beginning with the week of May 2-8, and ending the week of December 5-11. As shown in the figure, there were two clear peaks: immediately after the leak on May 2, when incident levels remained high for three weeks, and immediately after the release of the decision on June 24. In the week of the decision there was a dramatic peak, and then high levels remained for the next five weeks, until falling to minimal levels after that. These findings suggest most incidents were direct responses to *Dobbs*.

Figure 2. Number of Post-*Dobbs* Pro-Abortion Rights Criminal Incidents by Week, 2022



Note: Vertical lines indicate when the *Dobbs* leak (week 1) and release (week 8) occurred.

Analysis of Communiqués

This section analyzes communiqués or other written statements claiming responsibility for post-*Dobbs* criminal incidents. I first describe some characteristics of the communiqués, and then show how passages from communiqués illustrate several elements from radicalization theory.

Jane’s Revenge and Other Groups

Table 5 lists the communiqués in temporal order and supplies other basic information. Sixteen of the 20 communiqués claimed the “Jane’s Revenge” moniker, while one group called itself the “Anti-Hope Brigade” because they attacked the HOPE pregnancy center. One statement claimed responsibility for disrupting a Catholic mass in Chicago. I refer to this message as a statement rather than a communiqué because it was not explicitly sent on behalf of the group, but instead was posted by an individual who was involved. The communiqués were posted on blogs or Twitter, or were sent to an individual who posted the message on the Abolition Media blog.

Table 5. Communiqués/Statements Claiming Responsibility for Pro-Choice Militant Incidents

#	Incident Location	Date	Words	Type	Source	Results	Claimed by
1	Madison, WI	8-May	267	Arson, Vandal.	Jane's Revenge blog	82	Jane's Revenge
2	Olympia, WA	22-May	479	Vandalism	WA anarchist blog	17	Jane's Revenge
3	N/A	30-May	871	Call to action	Jane's Revenge blog	15	Jane's Revenge
4	Des Moines, IA	2-June	158	Vandalism	Twitter	3	Jane's Revenge
5	Philadelphia, PA	12-June	111	Vandalism	Anti-Capitalist blog	11	Anti-Hope Brigade
6	N/A	15-June	538	Call to action	Jane's Revenge blog	80	Jane's Revenge
7	Minnesota, MN	16-June	143	Vandalism	Abolition Media blog	10	Jane's Revenge
8	Detroit, MI	21-June	41	Vandalism	Jane's Revenge blog	14	Jane's Revenge
9	Glendale, CA	26-June	269	Vandalism	Jane's Revenge blog	10	Jane's Revenge
10	Arkansas/Kentucky	26-June	105	Cyberattack	Twitter	31	SiegedSec
11	Burlington, VT	27-June	359	Vandalism	Jane's Revenge blog	6	Jane's Revenge
12	Longmont, CO	27-June	79	Arson, Vandal.	Jane's Revenge blog	5	Jane's Revenge
13	Everett, WA	29-June	90	Arson, Vandal.	Jane's Revenge blog	4	Jane's Revenge
14	Lynchburg, VA	30-June	169	Vandalism	Jane's Revenge blog	6	Jane's Revenge
15	Portland, OR	27-June	157	Vandalism	OR Anarchist blog	4	"some baby killers"
16	Chicago, IL	27-June	307	Church disrupt.	Instagram	3	N/A
17	Southfield, MI	3-July	34	Vandalism	Jane's Revenge blog	2	Jane's Revenge
18	Oreland, PA	7-July	159	Vandalism	Anti-Capitalist blog	5	Jane's Revenge
19	Worcester, MA	8-July	120	Vandalism	Jane's Revenge blog	8	Jane's Revenge
20	Easthampton, MA	19-Aug	184	Vandalism	Abolition Media blog	7	Jane's Revenge

Though disrupting religious services is probably a less serious crime than vandalism or arson,³ the statement claiming a church disruption was included because 1) it advocates widespread disruptions, 2) disruptions could potentially violate federal law and lead to lengthy prison sentences (18 U.S.C. § 248), and 3) the statement urges readers to vandalize ("redecorate," as they put it) pro-life pregnancy centers, while linking to a site listing their addresses. The statement begins, "No Peaceful Mass in the anti-Abortion Church!," urging that all services in any Catholic or other "right-wing" church should be disrupted.

Extent of Publicity

Figures in the Results column indicate the number of Google search results that appear when a sentence from the communiqué is entered into Google. This was provided because it gives some indication of how widely disseminated these messages are. More sophisticated

³ To illustrate, disorderly conduct in Illinois can be punished by up to 30 days in jail, while graffiti or vandalism is punishable by up to a year in jail for damages under \$500 and by up to six years in prison for damages over \$500 (720 ILCS 5/26-1; 720 ILCS 5).

measures, such as counting the number of page visits, were not feasible. Interestingly, eleven of the communiqués yielded less than 10 search results, only two achieved several dozen (about 80 each), and none had over 100. Moreover, only 43 websites link to the main Jane’s Revenge blog.

It is possible that the communiqués were widely shared and read on encrypted apps like Telegram. Even so, these meager search results suggest that militants have failed to generate widespread interest in the communiqués’ content. In all likelihood, few people are reading them. Of course, since it only takes one or two people to carry out Jane’s Revenge-style attacks, a few readers can be enough.

Searches of press coverage of the communiqués produced similar results. News stories sometimes mentioned the communiqués, typically quoting one or two phrases. The first communiqué’s threat to employ “increasingly extreme tactics to maintain freedom over our own bodies” was cited in 26 newspapers, as shown in a NewsBank search. News coverage dropped precipitously after the first communiqué, however. For example, only three newspapers covered the cyberattack by SiegedSec, and the death threat in the Glendale, California communiqué was only reported in one newspaper. Many searches of print media using phrases from communiqués yielded either no results or a mention by a single Catholic magazine or conservative newspaper.

Timing of Communiqués

Notably, 65% of all communiqués were sent in June, the month *Dobbs* was released, and only four communiqués (20%) were released after the end of June. This suggests that attacks accompanied by communiqués initially generated enthusiasm among some activists and inspired copycats, but that this dissipated shortly after *Dobbs*’ release.

Targets and Types of Incidents Claimed in Communiqués

Though the first communiqué claimed an attack on a pro-life organization, nearly all the subsequent incidents claimed by communiqués targeted crisis pregnancy centers. The only other targets included a donor to pregnancy centers, another pro-life organization, state governments, and a church service. Notably, the first communiqué, announcing an arson

attack in Madison, specifically demanded that all “fake clinics” (along with other pro-life groups) disband within 30 days, perhaps giving a cue to future attackers. These clinics may have become the most frequent target not only because of longstanding grievances against them, but also because of sheer convenience. After all, pregnancy centers exist in abundance throughout the country while pro-life groups with storefronts are in short supply.

Some statements refer to the possibility of attacking police or courthouses, but most focus exclusively on crisis pregnancy centers. One communiqué, for example, says, “Crisis pregnancy centers as well as the banks, businesses, and churches that support them are all responsible for the violence of forced birth,” while omitting any mention of pro-life organizations or politicians. Such statements are important because they suggest that anyone supporting crisis pregnancy centers is responsible for violence, and ascribing violence to one’s enemies is an important part of the process of justifying violence against them (Ruddy, 2022). Another communiqué refers to them as “forced birth centers” and describes their “fascistic Christian, patriarchal violence toward pregnant people.” The “fascist” designation, of course, could also justify physical violence, at least from the perspective of some militant anti-fascists.

Another communiqué lists the addresses of several donors to crisis pregnancy centers and says, “Stay dangerous... and attack, without mercy, and make their fucking pockets bleed.” This suggests harming opponents financially is the only goal. In total, three communiqués included names and addresses of suggested targets. One envisions centers’ insurers and donors withdrawing support after realizing they are a “bad investment” due to attacks.

The sole cyberattack involved hacking into Arkansas and Kentucky government websites and allegedly releasing large amounts of sensitive, private information. This case was included despite uncertainty about whether the perpetrator(s) actually released sensitive information, because hacking into the states’ cloud storage was itself an illegal action. The “hactivist” communiqué says little other than making clear their pro-choice motivation and promising more attacks against “any pro-life entities, including government servers in” anti-abortion states.

Table 6. Selected Characteristics of Pro-Choice Militant Communiqués/Statements (n=20)

Characteristic	Number	Percentage
Mentions fascism or anti-fascism	5	25%
Direct or indirect reference to anarchism*	7	35%
Mention of uprooting civilization	2	10%
General death threat toward opponents	1	5%
“If abortions aren’t safe, neither are you” slogan*	10	50%
Includes names/addresses of suggested future targets**	4	20%
Urges creation of independent cells	12	60%
Refers to anti-abortion terrorism	3	15%

*Includes graffiti at site of claimed incident **One links to a site with addresses of all pro-life pregnancy centers.

Creating Independent Cells and Setting Agendas

Table 6 illustrates selected characteristics of the 20 communiqués. Twelve of the communiqués called on others to create their own cells and carry out their own actions. This is expected because the autonomous cell structure of Jane’s Revenge, like that of the Earth Liberation Front, involves actions by sets of unconnected individuals. Graffiti or communiqués containing the name “Jane” are sufficient to claim an attack for the group.

The initial Madison communiqué said, “We demand the disbanding of all anti-choice establishments, fake clinics, and violent anti-choice groups within the next thirty days,” adding aspirationally, “We are not one group, but many. We are in your city. We are in every city.” This suggests that any pro-life group or crisis pregnancy center could be targeted, and implicitly calls on others to attack them. This illustrates the agenda-setting function of communiqués (Brown, 2020). Addressing those who doubt the communiqués’ authenticity, one communiqué says, “Go do one of your own. You are already one of us. Everyone with the urge to paint, to burn, to cut, to jam: now is the time.” The communiqué ends, “Stay safe, and practice your cursive,” referring to the cursive “If abortions aren’t safe” graffiti in the Madison action.

Another communiqué says, “We encourage anyone to gather their friends, pick up a crowbar or a bottle of spray paint, find your nearest misogyny shop, courthouse, or pig pen and go fucking ape shit.” “Pig pen” is apparently a dehumanizing epithet for a police station. Another communiqué provides addresses for other targets, links to an online list, and then says, “We hope that all queers, anarchists, anti-fascists, and just plain-old pissed-off feminists in the area will use this information wisely.”

Direct or Implied Threats of Violence

Only one communiqué clearly threatened to kill its authors' ideological opponents: "We will hunt you down and make your lives a living hell. You started this war but we will win it. So far its just been pregnancy crisis centers, but tomorrow it might be your cars, your homes, or even your lives." This threat was directed against all the "conservatives, Fox News anchors, judges, cops, Christian extremists, or federal agents reading this." However, the first communiqué, which claimed responsibility for the Madison arson, threatened "increasingly extreme tactics." What is more extreme than arson? Presumably, direct violence against people.

Unlike in the case of the ELF (Brown, 2022), none of the Jane's Revenge communiqués have ruled out violence against people. The only example of policing standards (one of the four functions of communiqués (Brown, 2022)) comes from one instructing "cis male allies" not to "police us" or "tell us what is appropriate." Ten of the 20 communiqués included some version of "if abortions aren't safe, neither are you" slogan (in the communiqué or in graffiti at the incident), which conveys a threat to opponents' personal safety. This slogan comes in many variations, the most interesting of which is "Abortions are not safe and neither are you," since the threat is no longer conditional. Thus, 11 of the 20 communiqués contain direct or implied threats of violence toward people.

While there have been some instances of assault and even a shooting associated with post-*Dobbs* militancy, none of the claimed Jane's Revenge attacks have directly targeted individuals for harm. However, two firefighters were injured and required medical attention after trying to extinguish the blaze at a pregnancy center in Buffalo. This action was included in one communiqué's list of Jane's Revenge attacks, and perpetrators left "Jane was here" graffiti.

Anti-Fascism, Anarchism and Anti-Capitalism

Five of the communiqués mention fascism or anti-fascism, in most cases labeling their opponents as fascist. This is important because some radical anti-fascists believe that it is appropriate and even necessary to use physical violence against fascists (Logan and Ligon, 2021). Yet severe violence, such as murder, are extremely rare among anti-fascists. Michael

Reinhoehl's murder of a Trump supporter at a protest and Willem van Spronsen's attempted shooting at an immigration detention center appear to be the only examples in recent times. In any case, characterizing abortion opponents as fascist may have helped justify property damage, and could potentially result in physical violence against them.

Anarchism is also mentioned or alluded to in several of the communiqués, and anarchist graffiti was present at some of the attacks claimed by communiqués. As noted above, 20 of the 152 criminal incidents featured the anarchist circle-A symbol. More broadly, the concept of “autonomously organized self-defense networks” used in one communiqué, and another's call to “build robust, caring communities of mutual aid, so that we may heal ourselves without the need of the medical industry,” are consonant with the self-organization and opposition to hierarchy core to anarchist praxis (Loadenthal, 2014). References to uprooting civilization likely reflect influences from green anarchism or anarcho-primitivism, which critique all industrialism, sometimes even advocating a return to hunter-gatherer lifestyles (Williams, 2009).

Anti-Capitalism and 1960s Left-Wing Terrorism

Only one of the 152 criminal incidents featured a communist symbol, a modified version of the hammer and sickle. However, two communiqués were published on an “anti-capitalist” blog and two communiqués denounce capitalism. While the term “anti-capitalism” is primarily associated with anarchists in practice, it encompasses all those who oppose capitalism. Many contemporary far-left activists identify with anarchism, while others espouse a general revolutionary ideology blending opposition to capitalism with support for other causes without clarifying the role of the state (which distinguishes anarchist and socialist thought). For example, one communiqué says, “We fight not just for abortion rights, but for trans liberation, ecological harmony, decolonization, the destruction of white supremacy and capitalism, and the uprooting of the entire global civilization.”

This global revolutionary ideology is perhaps an updated version of those that inspired the female left-wing terrorists in Koehler's (2021b) study. Another communiqué's reference to “the wom*n of Argentina, Mexico and Poland organiz[ing] autonomously for their reproductive liberation” also indicates an international consciousness. Other statements (such

as “We exist in confluence and solidarity with all others in the struggle for complete liberation”) express a desire to integrate all left-wing movements.

Just one communiqué, the foundational Madison statement from May 2022, displays influences from communist thought: “We are forced to adopt the minimum military requirement for a political struggle.... Next time the infrastructure of the enslavers will not survive. Medical imperialism will not face a passive enemy.”⁴ The terms “struggle,” “imperialism,” and “enslavers” frequently occur in communist writings (North, 1952). However, even this attack featured anarchist graffiti. Communist thought may be one of many influences.

Interestingly, the first communiqué by the Weather Underground, the most well-known left-wing terrorist group from 1960s/70s America, began with the following words: “I’m going to read A DECLARATION OF A STATE OF WAR.” This is very similar to the opening words of the foundational Jane’s Revenge communiqué from Madison, which read, “This is not a declaration of war. War has been upon us for decades.” The authors may well have been familiar with the Weather Underground. Left-wing terrorism is well-known in Madison, due in part to an anti-war bombing there in 1970. For example, *The War on Home*, a film about Madison’s 60s-era anti-war radicalism, has been mentioned recently in Madison media outlets (WORT, 2020; Pasque and Becker, 2019).

Feminism

Feminism, of course, also influenced the communiqués. The third communiqué (which called for nationwide attacks the night *Dobbs* was released) was titled, “Night of Rage: An Autonomous Call to Action Against Patriarchal Supremacy.” The term patriarchal appears eight times in the communiqués. One communiqué mentions a “war against patriarchal religious control.”

Interestingly, the third communiqué spent over 100 words discussing the Uvalde school shooting, interpreting it as “an act of male domination and patriarchal violence.” The statement also says, “We know it is deeply connected to the reproductive violence about to be unleashed on this land by an illegitimate institution founded in white male supremacy.” Thus,

⁴ As noted above, one incident featured a communist symbol, but no communiqué claimed this action.

for some militants, seemingly disparate events are understood as connected in hidden but intimate ways. News of the Uvalde shooters' misogynistic statements online prior to his attack may have inspired these passages.

Another example of feminist thought includes one communiqué's radical critique of religions that oppose abortion and support marriage as "patriarchal sex abuse cults." Several references to pleasure, self-determination, and bodily autonomy also express feminist themes.

Elements from Radicalization Theory

Analyzing the communiqués with concepts from radicalization theory can shed light on militants' motivations and the likelihood of escalation. Accordingly, several elements from Sageman's radicalization model, as well as elements from other theories, are illustrated with quotes from communiqués in Table 7. This includes "denial of responsibility" from neutralization theory (similar to blame attribution in moral disengagement theory (Liddick, 2013; Blanco et al., 2020)), and framing the opponent as an existential threat (Ruddy, 2022). Reference is also made at times in this analysis to Saucier et al.'s (2009) sixteen components of the "militant-extremist mind-set." Sageman's disillusionment with nonviolent methods corresponds to Saucier et al.'s "necessity of unconventional and extreme measures" element, while Sageman's martial identity element is related to Saucier et al.'s (2019) element involving the use of military metaphors in non-military settings.

A new element, framing as a life and death issue, is also included, because this relates to the existential threat element. Of course, such framing is easy for either side to do, since one side claims abortion is murder and the other side emphasizes the risk of increased maternal mortality under abortion bans. Including this life/death element can be seen as a slight extension of Ruddy's (2022) threat-framing approach. While it does not involve an "existential" threat since the existence of the group is not at stake, the fact that deaths can be ascribed to ones' opponents could make violence easier to justify.

Another novel element, dire predictions of a future threat from opponents, is included as well because this appears to be a frequent, though not universal, theme in many terrorist writings. For example, anti-government extremists are obsessed with looming government crackdowns, and the Symbionese Liberation Army claimed in communiqués that the

government was about to kill all poor people and minorities (Norris, 2020). Such predictions can be impactful because they inflate threats, creating a sense of urgency that can lead to preemptive attacks. Sageman (2017) recognizes that exaggerating threats is key to justifying violence, but focuses on current rather than future threats. This element is thus a minor elaboration of Sageman’s theory. This element is also related to the “catastrophizing” element identified by Saucier et al. (2009), though this new element is focused in particular on opponents’ actions.

Table 7. Theoretical Elements from Radicalization Theory in Pro-Choice Militant Communiqués

Element	Illustrative Quotations
Outrage at State Aggression ¹	“the United States Supreme Court stripped millions of people of bodily autonomy and access to abortion.” (9)
Outrage at Non-State Aggression ¹	“reproductive violence... unleashed... by an illegitimate institution founded in white male supremacy” (3) “As you continue to bomb clinics and assassinate doctors with impunity, so too shall we adopt increasingly extreme tactics to maintain freedom over our own bodies” (1) “For decades you have bombed abortion clinics and murdered doctors... We will hunt you down and make your lives a living hell.” (9) “[A]bortion providers and clinic escorts... cannot possibly risk their lives or their livelihoods any further than they already are.” (3) “Too long have we been attacked for asking for basic medical care. Too long have we been shot, bombed, and forced into childbirth without consent. (1)
Disillusionment w/ Nonviolence ¹	“Circle jerk vigils where cis-het white hippies sound-off on their megaphones in the park like it’s 1969 are obviously doing nothing with actual consequence.” (11) “We cannot sit idly by anymore while our anger is yet again channeled into Democratic party fundraisers and peace parades with the police.” (3)
Martial Identity ¹	“We are forced to adopt the minimum military requirement for a political struggle.” (1) “If the attack on abortion does not stop our attacks will broaden.” (5)
Life/Death Struggle ² Opponent as Existential Threat ²	“We are literally fighting for our lives. We will not sit still while we are killed and forced into servitude.” (1) “Crisis pregnancy centers are exploitative and serve the aims of upholding the patriarchal family, a primary site of violence against women, queers, and children.” (2) “fake pregnancy clinics ... carry out the vision of MCCL toward a hellscape in which pumping out the ‘domestic supply of infants’ is the only thing people with a uterus are good for.” (7) “religious fake clinic[s]... inflicts emotional, financial, and physical violence” and “work to uphold patriarchy, christian supremacy, white supremacy, and cisheteronormativity.” (4) Clinics carry out “fascistic Christian, patriarchal violence toward pregnant people.” (20) “Those who would kill us are vulnerable and visible.” (13)
Dire Predictions of Future Threats ¹	“This is only the beginning of the attacks on autonomy in store from the courts and fascists. Up next on the chopping block is access to contraception, the legality of everyday queer life, and gay marriage. But this is part of a broader pattern of fascism within the United States.” (9) “we’ve already seen such stanzas where medical autonomy is stripped away, humanity is increasingly criminalized, and merely surviving becomes largely untenable.” (6) “Fascism is on the rise but so are we!” (14)
Denial of Responsibility ³	“War has been upon us for decades. A war which we did not want, and did not provoke.” (1) “We did not want this; but it is upon us, and so we must deal with it proportionally.” (6)

Note: communiqué # in parentheses (see Table 5). ¹=Sageman, 2017 (or extension). ²=Ruddy, 2022 (or extension). ³=Liddick, 2013.

Disillusionment with Non-Violent Protest. Two communiqués express the belief that nonviolent protest is useless. The Vermont communiqué mocked the state’s “tired, self-congratulatory, hippie liberalism,” while another communiqué describes feminist protests as

“demure little rallies for freedom” and discounted the “political machinery that has thusfar failed to secure our liberation.” Graffiti at one site also expressed this theme pithily: “vote blue lol [laugh out loud],” it said, mocking Democrats’ inability to prevent *Roe*’s reversal.

Outrage at State Aggression. As expected, *Dobbs* was seen as an act of aggression by the Court against the public, stripping them of fundamental rights of bodily integrity. The Court is also depicted as an illegitimate institution, fulfilling one of Saucier et al.’s (2009) elements of the extremist mind-set. Of course, casting government authority as illegitimate can be a powerful justification for illegal tactics.

Outrage at Non-State Aggression. Perhaps surprisingly, three communiqués (including the foundational Madison statement) prominently mention anti-abortion terrorism. What does that have to do with protesting *Dobbs*? From the social-identity perspective, radicalized members of a protest community see the out-group’s most extreme members—in this case anti-abortion terrorists—as most representative of the out-group (Sageman, 2017). In other words, any pro-life activist may be seen as morally equivalent to anti-abortion terrorists. Potentially, any attack on anyone in the pro-life camp might be framed as self-defense against murder, or as proportional revenge for anti-abortion terrorism.

The Madison communiqué says, “As you continue to bomb clinics and assassinate doctors with impunity, so too shall we adopt increasingly extreme tactics to maintain freedom over our own bodies.” The reference to “impunity” is puzzling, since the perpetrators have been punished harshly (one was even executed). For context, the last two murders of abortion doctors occurred in 2009 and 1998. There has not been an anti-abortion bombing since 2011, though an average of two arsons have occurred annually since 2010 (National Abortion Federation, 2021).

A later communiqué written by the Madison militants said, “We promised to take increasingly drastic measures against oppressive infrastructures,” clarifying their intent to escalate regardless of what anti-abortion extremists do. Even if *Dobbs* was the primary motivation for their attacks, anti-abortion terrorism apparently helped rationalize them.

Denial of Responsibility. The theme expressed by Jane Revenge’s opening thought, that “War has been upon us for decades,” and, “Too long have we been shot, bombed, and forced into childbirth without consent,” is consistent with the tendency of extremists to frame

their actions as self-defense, blaming the victim (Blanco et al., 2020). Similarly, another communiqué, immediately after threatening any “anti-choice group” that does not “close their doors,” says “We did not want this; but it is upon us, and so we must deal with it proportionally.”

If opponents’ actions are framed as violent and warlike, it is relatively natural to portray one’s own aggression as simply self-defense (Sageman, 2017). This is perhaps one reason the communiqués refer repeatedly to anti-abortion terrorism, since it provides a further rationale for framing their own attacks as defensive rather than offensive.

Martial Identity. A reference to “military requirements” for “political struggle” in the first communiqué, and several combative passages in later communiqués promising to never give up until they achieve victory, indicate the development of a soldier-like identity among some militants. War metaphors are key to justifying violence against out-groups (Sageman, 2017).

Life and Death Struggle. The first communiqué illustrates this theme very clearly, saying “We are literally fighting for our lives. We will not sit still while we are killed and forced into servitude.” Communiqués also refer to opponents as “those who would kill us” and “enslavers.” While there are legitimate concerns about abortion bans increasing maternal mortality, directly accusing opponents of being murderous is a significant step toward justifying lethal violence.

Existential Threat. The references to anti-abortion murders present their opponents as mortal threats. Moreover, several passages in communiqués portray crisis pregnancy centers and pro-life activists more generally as existential threats, identifying them as violent and bent on imposing a dystopic “hellscape” in which women are confined to “pumping out” babies (as in Margaret Atwood’s *The Handmaid’s Tale*). The quotes under this heading in Table 7 could also illustrate Ruddy’s (2022) “demonization” theme.

Dire Predictions. Related to the existential threat element, dire predictions of impending threats provide further urgency justifying the militants’ actions. The authors of communiqués believe “fascism is on the rise” and the fall of *Roe* is only the beginning of “attacks on autonomy” and a “broader pattern of fascism.” Such threat-framing can stimulate attacks by making them seem like necessary acts of preemptive self-defense.

Summary. In short, several elements from different radicalization theories, and two related novel elements, can be identified in the communiqués, many of them potentially justifying violence against people. In particular, depicting enemies as killers and enslavers akin to anti-abortion terrorists or totalitarians preparing to impose fascism, along with the use of war metaphors, suggests the necessity of a violent response. Notably, however, some elements of extremist thinking, such as a personal duty to engage in lethal violence, the “glorification of dying for the cause” (Saucier et al., 2009: 262), or the notion that a divine power will ensure their success (Saucier et al., 2009; Stankov et al., 2010), are absent. Moreover, the fact that only one communiqué contains an explicit death threat suggests that most perpetrators have not been radicalized to the extent of justifying lethal violence.

Trends in Anti-Abortion Violence and the Risk of Reciprocal Radicalization

The question of whether *Dobbs*, and the ensuing pro-choice militancy, will affect anti-abortion extremism should also be briefly considered. As noted above, Fodeman (2015) found that anti-abortion violence ebbed and flowed based on activists’ frustrations and the opening of avenues for political participation. After years of aggressive activism in the 1980s failed to stop abortion, anti-abortion violence rose significantly in the 90s. Fodeman suggests that decreased anti-abortion violence in the 2000s was due to activists’ involvement in the details of abortion restrictions, such as passing partial-birth abortion bans. By that logic, now that states can further restrict or ban abortion, this should prompt a “re-pluralization” effect (Koehler, 2017) decreasing anti-abortion attacks, because activists now have wider opportunities to achieve their aims through legislation.

However, two points of caution are appropriate here. First, more recent data on attacks on abortion clinics by the National Abortion Federation (2022) reveals a sustained rise of vandalism, invasions, assault, and burglary beginning in 2015 or 2016. The rise is so sharp one suspects that it could be an artifact of unreported changes in data collection. (The report did acknowledge altering its coding criteria for one incident type in 2015; it is conceivable their criteria for other categories changed as well.) For example, vandalism ranged from 5 to 22 incidents per year from 2010 to 2014 but ranged from 67 to 125 from 2015 to 2021.

If these increases are genuine, a possible cause is the presidential campaign of Donald Trump in 2015 and his election a year later. Trump's aggressive rhetoric may have sparked a general rise in hate crimes and far-right violence, including the mass shootings in El Paso and Pittsburgh (Nacos et al., 2020). This effect might be influencing anti-abortion incidents as well.

Second, while it is likely that anti-abortion extremist crime will decrease after *Dobbs*, several factors could potentially prevent this, such as 1) long-term radicalization processes that are not easily reversed, resulting in continued attacks by the same individuals or groups; 2) frustration that abortion remains legal in more populous states, and that efforts to ban abortion sometimes fail (as in August 2022 in Kansas); 3) the fact that interstate travel for abortion, presumably aided by pro-choice fundraising, may prevent sharp drops in abortions; 4) federal prosecution of pro-life activists for blocking clinic entrances, which activists perceive as harsh and disproportionate; and finally, 5) the rise of pro-choice militancy, which may prompt some to seek revenge.

As for the final point, terrorism research has repeatedly documented how terrorist attacks can spark terrorism from the opposing side (Koch, 2018). While such reciprocal radicalization is possible, increased anti-abortion terrorism in reaction to pro-choice militancy may be relatively unlikely, since it is in pro-life activists' interest to simply denounce attacks against pro-life targets and continue their legal efforts.

Discussion

This exploratory, mixed-method study documented 152 criminal incidents motivated by support for abortion rights, and analyzed 20 communiqués from groups claiming responsibility. Most incidents were limited to graffiti and other property damage, though some arsons and assaults occurred, as did one shooting. Nearly half of attacks were against crisis pregnancy centers, and many pro-life organizations and churches were also targeted. Graffiti ranged from liberal slogans ("My body, my choice") to calls for murder ("Kill all Christian nationalists.")

The communiqués demanded the disbanding of all pro-life institutions; threatened to escalate attacks beyond arson and property damage; displayed anarchist, anti-fascist, and feminist influences; included vague threats of violence and a direct death threat; and illustrated several elements of radicalization theories linked with violence toward people. New proposed theoretical elements building on current radicalization theories, including an emphasis on a life and death struggle and dire predictions of future threats, were included in this analysis as well.

This multifaceted analysis of a new type of left-wing militancy adds to the meager literature on contemporary far-left activity, showing how a single arson attack accompanied by an agenda-setting communiqué can help spark a wave of militancy with varied far-left and liberal influences. While many incidents likely would have occurred even without the initial Madison arson and communiqué, two key factors point to their role in stimulating further attacks: the widespread prevalence of the “If the abortions aren’t safe” slogan and “Jane’s Revenge” moniker invented by the Madison militants, and the fact that a plurality of attacks were against the “fake clinics” highlighted in the Madison communiqué.

This article also demonstrates how a single landmark court decision can usher in a wave of ideologically-motivated crime and give birth to a new radical movement of autonomous cells. As noted above, while it is possible some criminal incidents against pro-life targets would have happened even in the absence of *Dobbs*, close temporal proximity and the content of graffiti or communiqués strongly suggest that most attacks were in response to *Dobbs*. The communiqués are focused on *Dobbs*, many messages in graffiti (such as “abort the court”) refer to the decision, and over 70% of incidents occurred within three weeks after the *Dobbs* leak or release.

The prevalence of incidents in areas known for left-wing extremism (especially the Pacific Northwest) raises the question of whether *Dobbs* actually stimulated radicalization. Instead, militants already active in anarchist or anti-fascist subcultures may have simply expanded their targets in response to *Dobbs*. However, the fact that attacks occurred in 32 states, including many with no history of left-wing extremism, suggests that the *Dobbs* decision did trigger radicalization. Some perpetrators may have been motivated by liberal support for abortion rights and outrage about *Dobbs* and the tactics of pregnancy centers.

Indeed, while anarchist symbols were common, they were only found in a minority of incidents, and longstanding pro-choice slogans like “my body, my choice” were abundant.

As noted above, the widely-held belief that abortion is a fundamental human right (Judge et al., 2017) could easily translate into viewing the government (and pro-life groups) as illegitimate or authoritarian after *Dobbs*, thus potentially justifying militant action even for those who do not espouse a radical ideology. Thus, it seems likely that while many of the militants were motivated by ideologies like anarchism, many other perpetrators were progressives who were somewhat radicalized by *Dobbs*, to the extent that they engaged in property damage or other offenses against pro-life targets.

A copycat effect prompted by the Madison arson and communiqué may also account for many attacks, encouraging individuals or small groups to redefine themselves with a new identity. As one communiqué said, “yesterday we were novices; today we are Jane’s Revenge.” At a more basic level, perhaps the “If abortions aren’t safe” slogan and the “Jane’s Revenge” appellation (which were widely publicized after the Madison arson) simply encouraged some to attack pro-life targets to enact revenge against the pro-life side for reversing *Roe*.

Will the attacks have any effects? Only about 2% of the 3,000 crisis pregnancy centers were targeted, and most will probably resume operations with some repairs and fundraising. The attacks may also harm the pro-choice movement’s attempts to persuade the public in conservative states by enabling the portrayal of the pro-choice side as extremist. Indeed, though praise on social media may provide encouragement for pro-choice militants, these attacks appear to get far more attention from pro-life groups, now able to present themselves as victims of “pro-abortion terrorists.”

Conclusion

Although this analysis is necessarily preliminary, the recent wave of pro-choice militancy seems to have resulted from the belief that the Supreme Court committed an act of aggression against Americans by stripping them of a fundamental right of bodily autonomy, as well as from the influence of anarchism and related revolutionary ideologies, anti-fascism, and

longstanding grievances against crisis pregnancy centers. The history of anti-abortion terrorism provided an additional justification for some militants, including the authors of the influential Madison communiqué. Communiqués described pro-life activists as equivalent to killers and enslavers, framing them as existential threats and urging an all-out defensive war against them.

Will Jane’s Revenge become the Earth Liberation Front of the 2020s, causing damage in hundreds of incidents over a period of many years, or will it be remembered as a transitory phenomenon limited to the summer of 2022? Only time will tell. Since 86% of the incidents occurred in May through July, this burst of pro-choice militancy may have been temporary.

Nevertheless, these attacks could easily continue, perhaps emerging periodically from left-wing subcultures in the Pacific Northwest and elsewhere. Will attacks involve “increasingly extreme tactics,” as a communiqué promised? Perhaps, but despite implicit threats of violence in many incidents, a death threat in one communiqué, and several markers of violent radicalization in others, serious violence—such as murder or great bodily harm—appears relatively unlikely, as it has been rare among left-wing militants in recent decades.

Various factors suggest pro-choice militancy will not expand in the near future. These include the continued availability of abortion in many states, the growing popularity of the abortion pill, and widespread pro-choice activism to arrange for abortion-related travel, all of which might dampen enthusiasm for extralegal efforts. Even so, the existence of thousands of pro-life pregnancy centers, and frustration at being unable to counter them through legislation, along with strict abortion bans in several states, could stimulate ongoing attacks. Without heightened security, the centers will remain easy targets.

In terms of policy implications, the simplest way to prevent further incidents would be to increase security measures and thus prevent attacks. This may have already occurred to some extent (Warren, 2022). Successful criminal prosecutions would likely have a deterrent effect and encourage behavioral, if not ideological, deradicalization. Furthermore, if the mainstream pro-choice and pro-life movements condemn illegal tactics and promote opportunities to engage in legal activism, while fostering a belief that such strategies represent the best way of achieving their goals, this could decrease the demand for extralegal measures from either side. Stressing the unpredictable consequences of militant action, including the

likelihood that it will ultimately hurt their cause, may also discourage further incidents. After all, attacks on civilian targets typically fail to achieve perpetrators' objectives and often backfire (Abrahms, 2012; Martin, 2008).

Further research should document additional occurrences of pro-choice militancy in the US or elsewhere, such as the September 2022 arson of a cathedral in Bogota, Colombia by pro-choice demonstrators. The question of whether anti-abortion extremists are deradicalizing after *Dobbs* should also be explored. Aside from the issue of abortion, researchers might evaluate how Supreme Court decisions may have impacted radicalization processes in other ways as well.

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