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Sonic Jihad—Muslim Hip Hop in the Age of Mass Incarceration

*SpearIt**

I. PROLOGUE

Sidelines of chairs neatly divide the center field and a large stage stands erect. At its center, there is a stately podium flanked by disciplined men wearing the militaristic suits of the Fruit of Islam, a visible security squad. This is Ford Field, usually known for housing the Detroit Lions football team, but on this occasion it plays host to a different gathering and sentiment.

The seats are mostly full, both on the floor and in the stands, but if you look closely, you'll find that this audience isn't the standard sporting fare: the men are in smart suits, the women dress equally so, in long white dresses, gloves, and headscarves. These are the members of the new Nation of Islam, and they are waiting for their leader to take stage. After a brief introductory speech, the speaker, Ishmael Muhammad, announces: "Here is the Honorable Minister Louis Farrakhan!"

"Allahu Akbar" translates to "God is great." It is a call that has become widely recognized and associated with extremist Muslims in recent years, but chances are you haven't heard it quite like this. The gathered crowd chants in rapid succession. "Allahu Akbar!" "Long live Muhammad!" "Farrakhan, Farrakhan!" The crowd then erupts into applause as Farrakhan stands before the pulpit. This is Saviours' Day, the biggest event of the year for the Nation of Islam (NOI). The year 2007 is the 77th anniversary of the NOI, and Farrakhan is visibly pleased to see so many believers before him. He addresses them softly, like a kindly grandfather, as his "brothers and sisters."¹

Everyone before him is a brother or a sister under the wide umbrella of Islam, and today is a day for building bridges. Upon the stage with him is a flock of "distinguished guests . . . teachers, scholars, theologians, pastors, Imams, politicians, businessmen, and artists." To his left, sit these distinguished guests from the outside world, and to his right, sit a group of

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¹ *Saviours' Day Speech*, C-SPAN (Feb. 25, 2007), www.c-span.org/video/?196795-1/saviours-day-speech.

equally distinguished members of the NOI itself. His speech is heartfelt, his smile broad.

Farrakhan's words are a lesson in how to reach the youth—and focusing on what works. As radio and television have offered black children a poor set of role models, Farrakhan has sharp words for showbiz; yet at the same time, he is conscious of what famous people can do for the NOI—after all, when Malcolm X helped convert the boxer Cassius Clay into “Muhammad Ali,” it was a powerful push for the organization.² Thus instead of simply shunning entertainment, Farrakhan chooses a different route, one that finds a place for rap music in God's work:

Hip-hop is an art, and don't you talk down on it just because it has something in it that may not be to our liking. Talk up to it, because the hip-hop artist is the new leader. He leads the people wrong, but the same leader that leads them wrong can lead them right if you put the right message in their heads and in their hearts. Let's go get our hip-hop artists! Let's break the bond between these destructive CEO's and producers that tell conscious lyricists that that's not going to sell and force them to do filthy lyrics in the name of selling filth to our people.³

Farrakhan's aim is not to shun art, but rather to embrace it. His plan is not simply to accept hip hop as an artistic form and means of spreading the faith, but beyond, to try to convert those hip hoppers who are already famous. Farrakhan's approach is an active mission: “Let's go get our hip-hop artists!” This attitude likely helps to account for Islam's continued success in hip hop culture and the respect Farrakhan holds.⁴

By the end of his speech, Farrakhan effectively portrays hip hop culture as an important part of recruitment efforts. His attitude makes the rap world not just fair game for preaching efforts, but a main target, just as prisons are. For a genre of music that is shunned by many in a manner similar to the way prisoners are shunned by society, Farrakhan sees

² MURRAY FORMAN, *THE HOOD COMES FIRST: RACE, SPACE, AND PLACE IN RAP AND HIP HOP* 346 (2002).

³ *Saviours' Day Speech*, *supra* note 1.

⁴ FELICIA M. MIYAKAWA, *FIVE PERCENTER RAP: GOD HOP'S MUSIC, MESSAGE, AND BLACK MUSLIM MISSION* 22 (2005). In addition to using samples of speeches and interviews in musical productions and events, Farrakhan is directly referenced in dozens of songs. *See, e.g.*, PUBLIC ENEMY, *Don't Believe the Hype*, on *IT TAKES A NATION OF MILLIONS TO HOLD US BACK* (Def Jam Recordings 1988) (“A follower of Farrakhan, don't tell me you understand until you hear the man.”); JAY ELECTRONICA & JAY Z, *We Made It Freestyle* (2014) (“I'm the Farrakhan of Rap.”); NOTORIOUS B.I.G. & METHOD MAN, *The What*, on *READY TO DIE* (Bad Boy Records 1994) (“It's the praying mantis, deep like the mind of Farrakhan.”); RICK ROSS, *Mafia Music*, on *DEEPER THAN RAP* (Def Jam Recordings 2009) (“A Farrakhan aura.”); ERYKAH BADU, *Me*, on *NEW AMERYKAH PART ONE* (Universal Motown Records 2008) (“I salute you Farrakhan.”); Ultimate Truth, *Breaking News: Snoop Dogg Embraces Islam!!! Must See!!!!!!*, YOUTUBE (Mar. 8, 2009), www.youtube.com/watch?v=IBLYev9riQY (Snoop Dogg explaining that Farrakhan “has always been there for the hip hop community”).

something else. For those familiar with hip hop and prison history, what he sees is clear: Islamic symbols, names, and ideology have infused the very core of hip hop and prison culture. The history traces to Farrakhan's teacher, Elijah Muhammad, whose message spread rapidly in American penitentiaries beginning in the 1950s.⁵ The fusion of these creative forces would create a cadre of holy warriors with an artistic message bent on chanting down walls that hold many of their brethren captive.

This essay examines these musical works as a form of legal criticism. It focuses on the music as critical resistance and "new terrain" for understanding the law.⁶ More specifically, it focuses on what prisons mean to hip hop culture. Losing friends, family, and loved ones to the proverbial belly of the beast has inspired criticism of criminal justice from the earliest days of hip hop culture. In the music, prisons are known by a host of names like "pen," "bing," and "clink," terms that are invoked throughout the lyrics. The most extreme expressions offer violent fantasies of revolution and revenge, painted within a cosmic worldview that likens present conditions to the slave system that first brought African Muslims to America as slaves. The discursive war challenges the notion that the most radical voices in Muslim America are to be found in mosques or other Muslim gatherings. Such a position must contend with this sonic jihad and its aural assault against prisons.

The essay continues as follows: *The Hip Hop Generation: Down by Law* traces criticism of the law to the pioneering days of hip hop culture. It shows that hip hop music has been a powerful medium for protesting the law, particularly police and prisons. In *The Gods of Hip Hop*, the essay examines the Muslim contribution to the anti-prison campaign. It begins by situating the discussion within an Islamic context and traditional religious ideas about imprisonment. This approach lends an interpretive lens for the music, lyrics, and advocacy of artists. *Conclusions—Still Spitting Fire at the Enemy* ends by considering the political implications of this extremist messaging. This ending aims to leave the reader certain of how Muslims have supported hip hop, including in the struggle with its greatest enemy. In this ongoing war of words, Muslim artists continue to attack with brimstone war rhetoric that rivals any jihadist organization. These voices arguably represent the most radical Islamic discourse in America today that undoubtedly ranks Muslim rappers among the most cutting-edge critics of mass incarceration.

⁵ DENNIS WALKER, ISLAM AND THE SEARCH FOR AFRICAN AMERICAN NATIONHOOD: ELIJAH MUHAMMAD, LOUIS FARRAKHAN, AND THE NATION OF ISLAM 349 (Diana G. Collier ed., 2005).

⁶ Nick J. Sciullo, *Conversations with the Law: Irony, Hyperbole, and Identity Politics or Sake Pase? Wyclef Jean, Shottas, and Haitian Jack: A Hip-Hop Creole Fusion of Rhetorical Resistance to the Law*, 34 OKLA. CITY U. L. REV. 455, 456 (2009).

II. THE HIP HOP GENERATION: DOWN BY LAW

This section lays a foundation for understanding a unique dimension of hip hop and the “law.”⁷ Since its humble origins, hip hop has ascended to a “global counter culture.”⁸ All the while, the culture has been subverting the law, with hip hoppers in turn being subverted by law. Historically, “[h]ip hop arose out of the ruins of a post-industrial and ravaged South Bronx, as a form of expression of urban Black and Latino youth, who politicians and the dominant public and political discourse had written off, and for all intent and purposes, abandoned.”⁹ Ever since, hip hop music has been a vehicle for voicing grievances and “powerful indictments of the penal system and the judicial process.”¹⁰ “One does not have to search far to find rap songs expressing urban communities’ distaste for law enforcement and the legal system as a whole.”¹¹ Prisons and their effects are the repeated subject of angst and ire in the music, and, as has been described, “hip hop takes punishment personally.”¹² This section aims to give a sense of the culture’s preoccupation with police and prisons.

When interpreting hip hop lyrics, a few heuristics are worth noting. As a general matter, hip hop might be best understood as a strategy of resistance.¹³ In addition to resisting racial or religious discrimination, gangs, or poverty, the music has been instrumental in conveying black oppression and discontent with the law:

Hip-hop exposes the current punishment regime as profoundly unfair. It demonstrates this view by, if not glorifying law breakers, at least not viewing all criminals with the disgust which the law seeks to attach to them. Hip-hop points out the incoherence of the law’s construct of

⁷ PAMELA BRIDGEWATER, ANDRÉ DOUGLAS POND CUMMINGS & DONALD F. TIBBS, *HIP HOP AND THE LAW* (Pamela Bridgewater et al. eds., 2015) (offering study at various intersections, including criminal law, copyright law, property law, and electoral voting); Ministakiddone, *KRS-One, Fundamentals of Hip-Hop Volume #1: A Collection of Selected Lectures*, YOUTUBE (Feb. 28, 2015), www.youtube.com/watch?v=FpbxhUIKufA (describing hip hop itself as being in tension with the law. From the very first block parties that sucked electrical juice unlawfully to hold gatherings that facilitated the rooting of the culture).

⁸ Andre L. Smith, *Other People’s Property: Hop Hop’s Inherent Clashes with Property Laws and Its Ascendance as Global Counter Culture*, 7 VA. SPORTS & ENT. L.J. 59, 61 (2007).

⁹ Akilah N. Folami, *From Habermas to “Get Rich or Die Tryin’”: Hip Hop, the Telecommunications Act of 1996, and the Black Public Sphere*, 12 MICH. J. RACE & L. 235, 240 (2007).

¹⁰ Alex B. Long, *[Insert Song Lyrics Here]: The Uses and Misuses of Popular Music Lyrics in Legal Writing*, 64 WASH. & LEE L. REV. 531, 543 (2007).

¹¹ Jason E. Powell, *R.A.P.: Rule Against Perps (Who Write Rhymes)*, 41 RUTGERS L.J. 479, 484–85 (2009).

¹² Paul Butler, *Much Respect: Toward a Hip-Hop Theory of Punishment*, 56 STAN. L. REV. 983, 984 (2004).

¹³ HOUSTON A. BAKER, *BLACK STUDIES, RAP AND THE ACADEMY* 62 (1993).

crime, and it attacks the legitimacy of the system.¹⁴

Another key insight is the temporal relationship between hip hop culture and the growth of prisons.¹⁵ When hip hop culture first took root in the late 1970s, the country had just embarked on what would become a decades-long punishment spree, with billions in state funds going to correctional budgets.¹⁶ Hip hop was a late twin to this new penal boom. Like its counterpart, the music became a huge financial moneymaker, generating billions for record companies and publishing houses. The two were somewhat symbiotic since effects of mass imprisonment were felt directly by the hip hop generation and its offspring, who were subject to the law like no other demographic.¹⁷ “Whether blacks or Latinos, young men or women, hip hop’s youth found themselves—or someone close—chained to a correctional system and culture determined to mete out severe punishment.”¹⁸

A. Cursing and Killing Cops

In hip hop slang, the “law” often refers to police, which is a collective source of animosity in hip hop culture. The relationship between hip hop and law enforcement is profound, and according to one interpretation of KRS-One’s “Sound of da Police,” “policing Black people is actually the cornerstone of anti-Blackness under American law.”¹⁹ Pharoahe Monch drives the point home rhetorically: “What is the law? Know you heard this before. We find contraband in your car, we break in your jaw.”²⁰

Authored by some of the most influential acts in hip hop history, the songs center on the evils of cops brutalizing youth in poor, ethnic minority neighborhoods.²¹ Perhaps the greatest hip hop anthem of anti-police songs

¹⁴ Butler, *supra* note 12, at 985.

¹⁵ This period has also been noted as contemporaneous to the origins of critical race theory in the legal academy. See andré douglas pond cummings, *A Furious Kinship: Critical Race Theory and the Hip Hop Nation*, 48 U. LOUISVILLE L. REV. 499 (2010).

¹⁶ The Pew Center on the States, *State of Recidivism: The Revolving Door of America’s Prisons*, PEW TRUSTS 1 (Apr. 12, 2011), www.pewtrusts.org/uploadedFiles/wwwpewtrustsorg/Reports/sentencing_and_corrections/State_Recidivism_Revolving_Door_America_Prisons%20.pdf [hereinafter Pew Center, *Revolving Door*] (\$52 Billion in 2011 spent by the states).

¹⁷ BAKARI KITWANA, *THE HIP-HOP GENERATION: YOUNG BLACKS AND THE CRISIS IN AFRICAN-AMERICAN CULTURE* (2003); MICHAEL ERIC DYSON, *KNOW WHAT I MEAN? REFLECTIONS ON HIP HOP* (2010) (describing the common perception of the inevitability of going to prison among black men of the hip hop generation).

¹⁸ S. CRAIG WATKINS, *HIP HOP MATTERS: POLITICS, POP CULTURE, AND THE STRUGGLE FOR THE SOUL OF A MOVEMENT* 174 (2005).

¹⁹ Donald F. Tibbs, *From Black Power to Hip Hop: Discussing Race, Policing, and the Fourth Amendment Through the “War On” Paradigm*, 15 J. GENDER RACE AND JUST. 47, 71 (2012).

²⁰ PHAROAE MONCH, *What Is the Law*, OZ THE SOUNDTRACK (Avatar Records 2001).

²¹ See e.g., BONE-THUGS-N-HARMONY, *No Surrender, on CREEPIN ON AH COME UP* (Ruthless

is NWA's "Fuck tha Police," a satire of courtroom proceedings conducted by street rules.²² In this sketch, the group puts the police on trial in the case of "NWA v. the Police Department," with Dr. Dre presiding as judge and Ice Cube taking oath and offering the first testimony: "Fuck the police, coming straight from the underground. A young nigga got it bad cause I'm brown. And not the other color so police think they have the authority to kill a minority."²³ This unblinking stance toward police brutality paved the way for other indictments, including when rapper Ice T and his band, Bodycount, released the song "Cop Killer."²⁴ It instantaneously sparked widespread political discontent that eventually forced their record label to remove the song from the album.²⁵ The song's hook pulls no punches: "I'm a cop killer, better you than me. Cop killer, fuck police brutality. Cop killer, I know your family's grieving, fuck em! Cop killer, but tonight we get even."²⁶ Megastar rapper Tupac Shakur likewise shared no love for police and was an outspoken critic as "Fuck the Police" declares: "Punk police can't fade me—you made me, crooked ass-beast something daisy. But right now I got my mind set up, looking down the barrel of my nine. Get up! Cause its time to make that pay back. Fact."²⁷ In equally descriptive fashion, 50 Cent vows:

Police get in the way, I'll murder them, I'll Murder them
A nigga already got three strikes, I'll murder them, I said I'll murder

Records 1994); BOOGIE DOWN PRODUCTIONS, *30 Cops or More*, on EDUTAINMENT (Jive Records 1990); BRAND NUBIAN, *Claimin' I'm a Criminal*, on EVERYTHING IS EVERYTHING (BMG Direct Mktg., Inc. 1994); CHAMILLIONAIRE, *Ridin' Dirty*, on THE SOUND OF REVENGE (Universal Records 2005); CYPRESS HILL, *Pigs*, on CYPRESS HILL (Columbia Records 1991); DEAD PREZ, *Cop Shot* (Real Talk Entertainment 1996); GETO BOYS, *Crooked Officer*, on TILL DEATH DO US PART (Rap-A-Lot Records 1995); ICE CUBE, *Who Got the Camera*, on THE PREDATOR (Priority Records 1992); J-DILLA, *Fuck the Police* (Stones Throw Records 2001); JERU THE DAMAJA, *Invasion*, on WRATH OF MATH (Payday Records 1996); KRS-ONE, *Sound of Da Police*, on RETURN OF THE BOOM BAP (Jive Records 1993); LL COOL J, *Illegal Search*, on MAMA SAID KNOCK YOU OUT (Def Jam Recordings 1990); MOBB DEEP, *Cop Hell* (2004); KASINOVA THA DON, *15 Years Gone* (2012); NAS, *Cops Keep Firing* (101 Distribution 2010); PARIS, *Coffee, Donuts & Death*, on SLEEPING WITH THE ENEMY (Guerrilla Funk Recordings 2006); PRINCE PAUL, *Men in Blue*, on A PRINCE AMONG THIEVES (Rhino Entertainment 1999); PHAROAE MONCH, *What is the Law?* (Avatar Records 2001); PUBLIC ENEMY, *Get the Fuck Outta Dodge*, on APOCALYPSE 91 . . . THE ENEMY STRIKES BLACK (Def Jam Recordings 2001); TALIB KWELI, *The Proud*, on QUALITY (Rawkus Records 2002); JAY Z, *99 Problems*, on THE BLACK ALBUM (Roc-A-Fella Records 2003); W.C., *Out on a Furlough*, on AIN'T A DAMN THANG CHANGED (Priority Records 1991).

²² N.W.A., *Fuck tha Police*, on STRAIGHT OUTTA COMPTON (Ruthless Records 1988).

²³ *Id.*

²⁴ BODY COUNT, *Cop Killer*, on BODY COUNT (Sire Records 1992).

²⁵ See Leola Johnson, *Silencing: Class and Race Agendas in the Campaign Against Hardcore Rap Lyrics*, 3 TEMP. POL. & CIV. RTS. L. REV. 25 (1993).

²⁶ *Id.*

²⁷ Jumpjet61.tv, *2Pac-Fuck the Police*, YOUTUBE (Mar. 31, 2013), www.youtube.com/watch?v=IT35xVdE7Mc.

them

Any motherfucker touch me, I'll murder them, I'll murder them

You don't believe me wait and see, I'll murder them

You see, I told you I'd murder them.²⁸

B. Punishing Prisons

Like lyrics condemning crooked cops, in hip hop lyrics one does not have to dig much to find some story about the penitentiary.²⁹ There are countless songs that condemn prisons and the hardships they breed,³⁰ as well as whole albums dedicated to their demise,³¹ and even groups like Down by Law and State Property, whose identities reflect the importance of the penal system in hip hop consciousness.³² In *Why are So Many Black Men in Prison?*, one ex-prisoner offers his view on the breadth of prison's influence:

The subliminal messages sent by an extremely large portion of today's premier urban movies, rap and R&B songs, and music videos, if you are conscious and observative enough to notice, shows just how predominant prison is in our reality. Almost every Black song or video

²⁸ DJ WHOO KID, KARDINAL OFFISHALL & 50 CENT, *Officer Down*, on SABRINA'S BABY BOY (Howie McDuffie Music Group 2007).

²⁹ See HIP HOP IN AMERICA: A REGIONAL GUIDE 433 (Mickey Hess, ed., 2009) (noting Houston hip hop's preoccupation with prisons).

³⁰ See, e.g., NATE DOGG, *One More Day* (Death Row Records, Interscope Records 1994); SNOOP DOGG, *Murder Was the Case*, on DOGGYSTYLE (Death Row Records 1995); PROJECT PAT, *I Ain't Goin' Back to Jail*, on CROOK BY DA BOOK: THE FED STORY (Sony Records 2006); LIL B, *Trapped in Prison*, on I'M GAY (BasedWorld Records 2011); K-RINO, *Solitary Confinement*, on SOLITARY CONFINEMENT (Black Book International 2009); EVIDENCE, *Solitary Confinement*, on THE LAYOVER (Decon Records 2015); SIZZLA, *Escape from Prison* (Greensleeves Records 2001); HURRICANE G, *No More Prisons* (Raptivism Records 1999); GREYDON SQUARE, *Prison Planet*, on TYPE II: THE MANDELBROT SET (PART 1) (Greydon Square 2012); RETRO G, *Prison* (BitoyBeatz 2013); GOODIE MOB, *Sesame Street*, on SOUL FOOD (LaFace Records 1995); NELLY, *Fly Away*, on THE LONGEST YARD (Universal Records 2005); LIL' WAYNE, *Don't Get It*; LIFER'S GROUP, *Belly of the Beast* (Hollywood Basic 1991); AKON, *Locked up*, on TROUBLE (Universal Records, 2003); YING YANG TWINS, *24 Hour Lock Down* (BCD Music Group 2005); SLICK RICK, *Behind Bars* (Def Jam Recordings, 1994); ICE T, *The Tower* (Warner Bros. Records 2009); MAC DRE, *I've Been Down*, on THE BEST OF MAC DRE (Swerve Records 1999); YO GOTTI, *25 to Life*, on BACK 2 DA BASICS (The Orchard 2006); THE JACKA & AMPICHINO, *No Tears*, on DA KRAZIES (Double F Records 2010); PATNAZ GOT STRETCHES, *Trouble*, on DECEMBER 17TH (2 Tru Entertainment, 2014); TIM DOGG, *Goin Wild in the Penile* (Columbia Records 1991); THE CONVICTS, *Penitentiary Blues* (Rap-A-Lot Records 1991); JT MONEY, *Kite to da Boys*, on PIMPIN' ON WAX (Priority Records 1999).

³¹ See, e.g., No More Prisons Vol. 1 (Raptivism Records 1999); Public Enemy, IT TAKES A NATION OF MILLIONS TO HOLD US BACK (Def Jam Recordings, Columbia Records 1988); No More Prisons Vol. 2 (Raptivism Records 2003); STATE PROPERTY Soundtrack (Roc-A-Fella Records, Def Jam Recordings 2002).

³² Consider the fictional rap group CB4, which stands for "Cell Block Four," the section in prison where the group was founded. See CB4 (Universal Pictures 1993).

references prison or jail in one way or another³³

Although this might overstate the case, the prominence of prisons in the music goes all the way back to the phrase “down by law.” The phrase has been a staple in hip hop since Grandmaster Flash and the Furious Five’s pioneering album, *The Message* in 1982.³⁴ What it is to be “down by law” is obvious and not so; as an overt assertion of the law’s oppression it is clear, yet there is a more technical meaning that is intimately intertwined with prison culture. According to UrbanDictionary.com, Jim Jarmusch, director of the film by the same name:

Down by law, at the time in the mid-80s, was kind of in use on the streets as meaning a very close connection with somebody. If somebody was down by law, they were close to you or you would protect them. I know that, earlier, in prison slang, if somebody was down by law, and they got out before you, they would contact your family or look after people outside if you needed them to. So it meant something very close to a code. I really liked the contradiction of that, being something that sounds like being oppressed by the law, which of course under that condition is where the slang came from.³⁵

Being “down by law” thus had multiple meanings that connoted both legal oppression and mannerisms in prison culture that developed as a result.

The Message is particularly important in this regard since the album put prisons front and center as one of the greatest problems facing black youth. The album’s namesake song delivers a scathing critique of life in the ghetto and made the brutal realities of prison all too real for the hip hop generation. One passage describes a youth who is convicted for robbery and sentenced to eight years of prison.³⁶ His experience quickly deteriorates after being forced into sex slavery, “being used and abused and served like hell, till one day [he] was found hung dead in a cell.”³⁷ Described as “one of the most important songs in hip hop history,” the message made clear to the hip hop generation that prisons were a menacing threat.³⁸

Later artists followed in their predecessors’ footsteps and took criticism of prisons to new heights. Rappers like Dead Prez have written multiple songs detailing the ills of imprisonment, including “Police State,”

³³ DEMICO BOOTHE, WHY ARE SO MANY BLACK MEN IN PRISON? 101–02 (2d ed. 2007).

³⁴ GRAND MASTER FLASH AND THE FURIOUS FIVE, *The Message, on THE MESSAGE* (Sugar Hill Records 1982).

³⁵ *Down by Law*, URBANDICTIONARY.COM, www.urbandictionary.com/define.php?term=Down+by+Law (last visited Jan. 3, 2016).

³⁶ GRAND MASTER FLASH AND THE FURIOUS FIVE, *supra* note 34.

³⁷ *Id.*

³⁸ CHARISE L. CHENEY, BROTHERS GONNA WORK IT OUT: SEXUAL POLITICS IN THE GOLDEN AGE OF RAP NATIONALISM 8 (2005).

which situates imprisonment within a greater racial struggle: “The average black male live[s] a third of his life in a jail cell cause the world is controlled by the white male.”³⁹ Ludacris’ “Do Your Time” tells of stark realities behind bars: “It’s slavery, hard labor, catch the feel. Redneck on the hearse while you walk, it’s real. With a shotgun, burnin’ at the back of your dome 300 years left, my dawg ain’t never comin’ home.”⁴⁰ Hussein Fatal’s “Prison” tells of the harsh environment where even hardened individuals break down: “In prison is similar to dying, where a gangster can get a pass if he in his cell crying.”⁴¹ Such lyrics attest to the special space prisons occupy in hip hop consciousness and provide a backdrop for the next section, which focuses on Muslim artists.

III. THE GODS OF HIP HOP

In the world of hip hop, Islamic influences cannot be overstated.⁴² Muslim rappers from different denominations bring prophetic and charismatic voices to the culture in the name of promoting peace, love, and self realization, while extreme varieties tend toward apocalyptic brands of faith, steeped in gangster isms and the rhetoric of retribution. Muslim artists represent some of the most influential, best-selling, and widely known entertainers in hip hop music,⁴³ who have helped steer the course of hip hop history.

A. Islamic Attitudes Towards Prisoners

Before delving straight into the lyrics, it is worth considering traditional Islamic attitudes toward prisoners. This approach provides a useful lens for interpreting the music and lyrics.⁴⁴ The religious underpinnings of the faith reveal multiple rationales at stake for Muslims to

³⁹ DEAD PREZ, *Police State*, on LET’S GET FREE (Loud Records 2002).

⁴⁰ LUDACRIS, *Do Your Time*, on RELEASE THERAPY (Def Jam Recordings 2006).

⁴¹ HUSSEIN FATAL, *Prison*, on SECTION 8—HUSTLIN’ IN FRONT OF HOUSING—THE MIXTAPE, VOL. 1 (Thugertainment 2006).

⁴² In addition to the foundational influence of Afrika Bambaataa, Rakim Allah, Big Daddy Cane, Kook Moe Dee, and other artists, Islamic themes of early artists, including D.J. Islam, Afrika Islam, and T.C. Islam, Islamic themes are evident in appropriations such as 50 CENT, *Ghetto Qu’ran*, on Power of the Dollar (Trackmasters Entertainment, Columbia Records 2000); JOEY JIHAD, <https://soundcloud.com/joey-jihad>. Also worth noting are the songs that focus on or mention Mumia Abu-Jamal, a Muslim who has been incarcerated for decades. See KRS-ONE, *Free Mumia*, on KRS-ONE (Jive Records 1995); UNBOUND ALLSTARS, MUMIA 911 (Ground Control Records 1999).

⁴³ See e.g., SpearIt, *Raza Islamica: Prisons, Hip Hop & Converting Converts*, 22 BERKELEY LA RAZA L.J. 175 (2012).

⁴⁴ See generally JON MICHAEL SPENCER, THEOLOGICAL MUSIC: AN INTRODUCTION TO THEOMUSICOLOGY (1991); see also THE EMERGENCE OF BLACK AND THE EMERGENCE OF RAP, A SPECIAL ISSUE OF BLACK SACRED MUSIC: A JOURNAL OF THEOMUSICOLOGY (Jon Michael Spencer ed., 1991).

oppose prisons. Thus, beyond the mere fact that many Muslims are incarcerated, resisting prisons may have more divine implications.

Passages in the Quran intimately link the treatment of prisoners to spiritual consciousness. Verses signal out kindness to captives as a virtue⁴⁵ and means of eradicating sins,⁴⁶ and as a means of exercising piety.⁴⁷ The message of Sura 90:10–13 offers a telling lesson in this regard:

Did we not show him the two paths?
He should choose the difficult path.
Which one is the difficult path?
The freeing of slaves.⁴⁸

The scripture equates the freeing of slaves with the “difficult” path—which obviously can be interpreted literally or figuratively. There is also verse 9:60 that prescribes how *zakah* or alms should be spent: “Zakah expenditures are only for the poor and for the needy and for those employed to collect [zakah] and for bringing hearts together and for freeing captives”⁴⁹ One commentator has interpreted this passage to indicate a hierarchy in the ransoming of prisoners over slaves: “Ransoming Muslim prisoners who have been captured by kaafirs is better than freeing slaves, so it is included [in the zakah] and indeed takes priority, because they suffer great harm by being separated from their families and because of the humiliation and torture. So saving them is even more important than saving slaves.”⁵⁰

There are other cultural connections. For example, one scholar notes that “Malik, the founder of the Maliki School, allows Muslims to visit the lands of the infidels for one purpose only—to ransom captives.”⁵¹ This religious duty was not lost in hip hop when Mujahideen Team referred to itself as “technicians of a Maliki tradition” in the song “Dead Has Risen.”⁵² As a song focused on ransoming “soldiers locked down making juma in prison,” the group has built on this idea to create a clear sense of its identity as “slave-emancipators.”⁵³

⁴⁵ QURAN 4:36; 9:60 (Rashad Khalifa trans., 2010).

⁴⁶ QURAN 4:92, 58:3 (Rashad Khalifa trans., 2010).

⁴⁷ QURAN 2:177, 24:33; 90:13 (Rashad Khalifa trans., 2010).

⁴⁸ QURAN: THE FINAL TESTAMENT 365 (Rashad Khalifa trans., 2010).

⁴⁹ QURAN 9:60 (Sahih International).

⁵⁰ Shaykh Muhammad Saalih al-Munajjid, *Is It Permissible to Ransom Muslim Prisoners Using Zakaah Money?*, ISLAM QUESTION AND ANSWER, islamqa.info/en/20936 (last visited Oct. 11, 2015).

⁵¹ BERNARD LEWIS, RACE AND COLOR IN ISLAM 49 (1980).

⁵² MUJAHIDEEN TEAM, *Dead Have Risen*, on CLASH OF CIVILIZATIONS (Remarkable Current Records 2005).

⁵³ *Id.*

Contemporary views among Muslims reflect similar values. For example, the NOI has been at the fore of prison outreach and has been setting prisoners “free” in the spiritual sense for decades. Such Muslim outreach undoubtedly contributes to the widespread conversion to Islam among African-American prisoners. In addition, the organization has been outspoken in its opposition to mass incarceration. On its list of “What the Muslims want,” the NOI for years has listed: “We want freedom for all Believers of Islam now held in federal prisons. We want freedom for all black men and women now under death sentence in innumerable prisons in the North as well as the South.”⁵⁴ Such a position seems tame compared to a more recent statement in 2013 by Al-Qaeda leader, Ayman al-Zawahri, who vowed to set prisoners free from the American-run Guantanamo Bay prison: “We pledge God that we will spare no efforts to set them free along with all our prisoners . . . and every oppressed Muslim everywhere.”⁵⁵

B. Two Decades of Blasting

Muslims critiquing prisons is a permanent part of the hip hop repertoire.⁵⁶ Although it might be thought that the focus on imprisonment is a later development in the music,⁵⁷ this essay’s focus on Muslim artists shows a tradition that traces to the earliest days of the culture. This is especially true if one considers the influence of the Last Poets and their pro-Muslim, anti-prison politics in the 1960s⁵⁸ and the influence of H. Rap Brown, who converted to Islam in prison in the 1970s, and whose poetry from prison appeared on the first commercially recorded hip hop song,

⁵⁴ *What the Muslims Want*, NATION OF ISLAM, www.noi.org/muslim-program (last visited Oct. 11, 2015).

⁵⁵ *Al-Qaeda: We Will Try to Free Guantanamo Inmates*, ASSOCIATED PRESS (July 31, 2013, 11:55 AM), www.usatoday.com/story/news/world/2013/07/31/al-qaeda-guantanamo-inmates/2603035.

⁵⁶ BRAND NUBIAN, *Claimin’ I’m a Criminal*, on EVERYTHING IS EVERYTHING (BMG Direct Marketing 1994); JEDI MIND TRICKS, *Shadow Business*, on SERVANTS IN HEAVEN, KINGS IN HELL (Babygrande Records 2006); AKBAR, *Battle Cry*, on NO MORE PRISONS (Raptivism Records 2000); FREEWAY, *I Cry*, on FREE AT LAST (Roc-A-Fella Records 2007); BROTHER ALI, *Only Life I Know*, on MOURNING IN AMERICA AND DREAMING IN COLOR (Rhymesayers Entertainment 2012); X-CLAN, *Prison*, on RETURN FROM MECCA (Suburban Noize Records, 2006); WU-TANG CLAN, *What You in Fo’*, on THE ESSENTIAL WU-TANG CLAN (Avatar Records 2001); POOR RIGHTEOUS TEACHERS, *Dreadful Day*, on THE ESSENTIAL POOR RIGHTEOUS TEACHERS (Profile Records 1996); DMX & BUSTA RHYMES, *Otis Freestyle* (2011), 2dopeboyz.com/2011/08/04/dmx-busta-rhymes-otis-freestyle/; PETE ROCK, *Folsom Prison Blues Remix* (Compadre Records 2009), www.youtube.com/watch?v=mx-bPnI9fHk; ICE CUBE, *The Nigga Trapp*, on LAUGH NOW, CRY LATER (Lench Mob Records 2006); LUPE FIASCO, *Free Chilly*, on LUPE FIASCO’S THE COOL (Atlantic Records 2007).

⁵⁷ JEFFREY O.G. OGBAR, HIP-HOP REVOLUTION: THE CULTURE AND POLITICS OF RAP 139 (2007) (“At the close of the twentieth century, songs attacking the plague of drugs and black-on-black violence have given way to criticism of the prison industrial complex and criminal justice system in general.”).

⁵⁸ ROBERT DANNIN, BLACK PILGRIMAGE TO ISLAM 171–72 (2002).

“Rapper’s Delight” in 1979.⁵⁹ In addition, at least one member of Grandmaster Flash and the Furious Five, Rahiem, claimed allegiance to the Five Percent Nation of Islam.⁶⁰

These early attitudes resonated with later generations of artists. Perhaps the most forceful statement against the prison system would come just a few years later in 1988 with Public Enemy’s album, *It Takes a Nation of Millions to Hold Us Back*.⁶¹ The album features a bold graphic of the group behind prison bars and classics like “Black Steel in the Hour of Chaos.”⁶² Perhaps the crown jewel of anti-prison raps, this song tells about a prison escape inspired by unbearable prison conditions:

They got me rotting in the time that I’m serving
Telling you what happened the same time they’re throwing
Four of us packed in a cell like slaves—oh well
The same motherfucker got us living in his hell
You have to realize that it’s a form of slavery
Organized under a swarm of devils⁶³

A decade later, Nas would tell of haunting despair in “Last Words,” which creatively flips the artistic angle by telling the story from the *prison’s* perspective: “I’m a prison cell six by nine. Living hell stone wall metal bars for the gods in jail. My nickname the can, the slammer, the big house. I’m the place many fear cause there’s no way out.”⁶⁴ This solitary chamber, however, has more to say about the too many inmates who fall apart inside its confines:

When you cry I make you feel alive inside a coffin
Watch you when you eat play with your mind when you sleep
Make you dream that you free, then make you wake up to me
Face to face with a cage, no matter your age
I can shatter you, turn you into a savage in a rage⁶⁵

⁵⁹ SUGARHILL GANG, *Rapper’s Delight*, on SUGARHILL GANG (Sugarhill Records 1980); Mrdaveyd, *Black History Month: The Legacy of H Rap Brown (Imam Jamil Al-Amin)*, HIP HOP AND POLITICS (Feb. 2, 2014), <http://hiphopandpolitics.com/2014/02/02/black-history-month-legacy-h-rap-brown-imam-jamil-al-amin>.

⁶⁰ *The Furious 5 Bio*, OFFICIAL SITE OF THE FURIOUS 5, www.furious5.com/hist.htm (last visited Oct. 12, 2015).

⁶¹ PUBLIC ENEMY, *IT TAKES A NATION OF MILLIONS TO HOLD US BACK* (Def Jam Recordings Columbia Records 1988).

⁶² PUBLIC ENEMY, *Black Steele in the Hour of Chaos*, on *IT TAKES A NATION OF MILLIONS TO HOLD US BACK* (Columbia Records 1988).

⁶³ *Id.*

⁶⁴ NAS, *Last Words*, on *NASTRADAMUS* (Columbia Records 1999).

⁶⁵ *Id.*

The year after this song's release, rapper Beanie Sigel contributed a similarly chilling classic focused on the maddening dullness of day-to-day existence.⁶⁶ Likely reflecting some of his own experiences while incarcerated, his technique in "What Ya Life Like?" asks the listener a string of questions that juxtaposes prison life with normal existence:

What you know about solitary?
 Locked down, no commissary . . .
 What you know about no parole?
 Life in the hole
 Life's cold, you be eatin' them swags
 Guards on the nightshift beatin' you bad
 The hardest nigga turned bitch, sleepin' with fags⁶⁷

In the sequel to this song, Sigel continues the theme, but rather than quizzing the ignorant, the rhetorical approach is reversed and the questions are posed to one who knows:

Can you tell me what you live like?
 Can you tell me what that bed like, what's that cell like?
 What's livin in hell like? Tell me do you eat right?
 Do you even sleep right?
 Yo, tell me what your life like
 Tell me do you sleep nights, tell me what that life like?
 Gettin no kites like, no flicks like
 Make you wanna quit life⁶⁸

C. Expressions After Terror

The above lyrics capped a golden era of prison raps, yet the culture would take a turn after the 2001 attacks in New York City. Attitudes toward imprisonment both by Muslims and Muslim sympathizers took on a decidedly more menacing countenance.⁶⁹ This qualitative difference may be traced to the social and political backlash against Muslims in America that followed the attacks. Artists like Immortal Technique, Paris, Mujahideen Team, and other rappers in this vein unleashed a verbal rampage that has been dubbed "jihadi" rap for its firebrand lyrics.⁷⁰ The lyrics talk of suicide

⁶⁶ BEANIE SIGEL, *What Ya Life Like*, on THE TRUTH (Roc-A-Fella Records 2000).

⁶⁷ *Id.*

⁶⁸ BEANIE SIGEL, *What Ya Life Like 2*, on THE REASON (Roc-A-Fella Records 2001).

⁶⁹ IMMORTAL TECHNIQUE, *Point of No Return*, on REVOLUTIONAR, VOL. 2 (Nature Sounds 2003); AKBAR, *Battle Cry*, on NO MORE PRISONS (Raptivism Records 2000); MUJAHIDEEN TEAM, *Dead Has Risen*, on M-TEAM CLASH OF CIVILIZATIONS (Remarkable Current 2005); VINNIE PAZ, *End of Days*, on SEASON OF THE ASSASSIN (Enemy Soil 2010).

⁷⁰ See Daveed Gartenstein-Ross, *Jihadi Rap*, FRONTPAGEMAGAZINE.COM (Nov. 10, 2004), <http://archive.frontpagemag.com/readArticle.aspx?ARTID=10635>; Richard Smirke, *Jihadi Rap*,

bombings, attacking the White House, and setting prisoners free, all of which signals a break from longstanding hip hop critiques, since previously the discourse focused on telling the pains of prison—now the radicalism was infused with greater political urgency.

As a result of political events, hip hop's radical posture toward prisons was further radicalized. On the fringes of hip hop lyricism bubbled a cadre of rappers who pushed the boundaries of free speech. Among these individuals, Immortal Technique emerged as one of the most militant. Although it is uncertain if he himself holds sectarian views, Technique has been an avid commentator on Muslim issues, and was himself previously incarcerated as he indicates:

This is the point of no return I could never go back
 Life without parole, up state shackled and trapped
 Living in the hole looking at the world through a crack . . .
 A suicide bomber strapped down ready to blow
 Lethal injection strapped down ready to go.⁷¹

Even ultra-radicals like Jedi Mind Tricks took time from their lyrics of punishment and vengeance to showcase the prison's moneymaking aspects in "Shadow Business":

It's 1.6 million people locked in jail
 They the new slave labor force, trapped in hell
 They generate over a billion dollars worth of power
 And only gettin' paid twenty cents an hour
 They make clothes for McDonald's and for Applebee's
 And workin' forty-hour shifts in prison factories . . .
 Slavery's not illegal, that's a fuckin' lie
 It's illegal, unless it's for conviction of a crime⁷²

Although the figure quoted by now is well over two million,⁷³ "Trigger" helps to explain the driving force behind such numbers:

Homeland security, political impurity
 Governmental crackdown quick to put the smackdown

Understanding the Subculture, BILLBOARD (Oct. 10, 2014), www.billboard.com/articles/news/6273809/jihadi-rap-l-jinny-abdel-majed-abdel-bary; IMMORTAL TECHNIQUE, *REVOLUTIONARY VOL. 2* (Nature Sounds 2003); PARIS, *SONIC JIHAD* (Guerilla Funk Recordings 2003); MUJAHIDEEN TEAM, *CLASH OF CIVILIZATIONS* (Remarkable Current 2005); JEDI MIND TRICKS, *Shadow Business*, on *SERVANTS IN HEAVEN, KINGS IN HELL* (Babygrande Records 2006).

⁷¹ IMMORTAL TECHNIQUE, *Point of No Return*, on *REVOLUTIONARY VOL. 2* (Nature Sounds 2003).

⁷² JEDI MIND TRICKS, *Shadow Business*, on *SERVANTS IN HEAVEN, KINGS IN HELL* (Babygrande 2006).

⁷³ PETE WAGNER & LEAH SAKALA, *Mass Incarceration: The Whole Pie*, PRISON POLICY INITIATIVE (Mar. 12, 2014), www.prisonpolicy.org/reports/pie.html.

Hide away the gat now before they come rush us
 The 21st century got too many pressures
 Anxious and scared and their plans to depress us
 Nowhere to confess because they watch us with sensors
 Life is the sentence when you fail to obey
 Better take a holiday, run away like OJ⁷⁴

Mujahideen Team also raps about a day when friends and “soldiers” come home from prison and live a life in Islam:

Coming home out of the jails, out of the prisons, out of the slave
 plantations man
 Welcome home, all my soldiers that were locked
 Welcome home free from the prison blocks
 Welcome home, a fresh new start from the past
 Keep your head up and stay on the straight path
 Welcome home, all my soldiers that were locked
 Welcome home free from the prison blocks
 Welcome home, a fresh new start from the past
 Keep your head up and stay on the straight path⁷⁵

Lupe Fiasco has been equally outspoken about the harms of prison and equally torn from the impacts. In “Free Chilly,” a tearful serenade to those on lockdown, he focuses on forgiveness and the prospects of reunion with lost comrades: “If we could break down those walls to set you free, we would cause we’re out here, and we miss you.”⁷⁶ More recently, Fiasco’s “Prisoners 1 & 2” offers a creative *pièce de résistance*, which begins with the prerecorded message of a collect call from prisoner number one:

Getting slammed from the protest, no food
 Force fed him like OB with a nose tube
 I’m just looking at they feet, cause I’m looking for the lord
 Looking in the library, looking at the law
 10 years deep now I’m looking at the bars
 Claim sovereignty because I’m bunkin’ with the moors⁷⁷

In this prisoner’s plight, the law offers little succor. Still, he manages to find relief by associating with the “moors,” which is shorthand for Muslims.⁷⁸ Prisoner number two offers a striking contrast since it is not about a prisoner serving a sentence, but a racist guard who is likened to an

⁷⁴ ZION I & THE GROUCH, *Trigger*, on *HEROES IN THE CITY OF DOPE* (OM Records 2013).

⁷⁵ NEW MUSLIM COOL (Specific Pictures 2009).

⁷⁶ LUPE FIASCO, *Free Chilly*, on *THE COOL* (Atlantic Records 2007).

⁷⁷ LUPE FIASCO, *Prisoners 1 & 2*, on *TETSUO & YOUTH* (Atlantic Records 2015).

⁷⁸ *Id.*

inmate: “You a prisoner too, you living here too. You just like us, til your shift get through. You could look like us, you know shit get through. You should be in cuffs like us, you should get strike two.”⁷⁹ Among the accusations is the prospect that the correctional officer is a smuggler and should be behind bars with the inmate as a resident rather than as staff. The point is obvious—despite their positions—the prisoner may be freer than the guard, who in turn may be more criminal.

Kanye West’s “New Slaves,” makes neoslavery arguments against the machine that pushes private prisons:

Meanwhile the DEA
 Teamed up with the CCA
 They tryna lock niggas up
 They tryna make new slaves
 See that’s that privately owned prison
 Get your piece today⁸⁰

He points to a conspiracy between the government and one of the major players in private prisons. The joint forces offer a new mode of moneymaking based on ancient principles of human traffic. Beyond maintaining a hard anti-prison posture, West’s most recent effort continues the longstanding tradition of honoring Farrakhan in the music.⁸¹

Although recording artists resist imprisonment primarily through their music, an original protest came from Yasiin Bey (also known as Mos Def) in 2013. Bey voluntarily agreed to undergo the force-feeding process to which prisoners are subjected at the American prison at Guantanamo Bay. The recording of this event had to be stopped at Bey’s request, who could no longer endure the procedure.⁸² A sobbing Bey is shown at the end in a daze, at which point one is not sure if it is from what he just experienced or the thought of those who must go through it for real.

IV. CONCLUSION: LESSONS IN WAR & PEACEMAKING

As this essay argues, some of the most extreme discourse in America appears in hip hop’s criticism of the law. Muslim artists have been dropping bombs on police and prisons for decades, and have particularly pushed the

⁷⁹ *Id.*

⁸⁰ KANYE WEST, *New Slaves*, on YEEZUS (Def Jam Recordings 2013).

⁸¹ See KANYE WEST, *All Day*, on SWISH (Def Jam Recordings 2015) (“Just Talked to Farrakhan, that’s sensei, nigga.”); see also, Mathew Pulver, *Louis Farrakhan, Rising: With Rap’s Superstars at His Side, the Nation of Islam Leader Steps Forward in the New Fight for Civil Rights*, SALON (Apr. 27, 2015), www.salon.com/2015/04/27/louis_farrakhan_rising_with_raps_superstars_at_his_side_the_nation_of_islam_leader_steps_forward_in_the_new_fight_for_civil_rights.

⁸² See The Guardian, *Yasiin Bey (aka Mos Def) Force Fed Under Standard Guantánamo Bay Procedure*, YOUTUBE (July 8, 2013), www.youtube.com/watch?v=z6ACE-BBPRs.

heights of imagery and creativity in the name of slaying the beast.

Although Muslim fundamentalists are notorious for speeches built on fierce religious rhetoric, American hip hoppers are equally adept at battling with words. For example, invocations of Muslim sisters and daughters being violated are a longtime tool of extremist rhetoric.⁸³ Yet hip hoppers have mastered the technique, as in “Day of Retribution,” a call to war that imitates what one might hear at a protest march in the Middle East. This procession, however, is taking place on American soil, and the man blaring on the megaphone is not speaking in Arabic, but English:

Oh you sons and daughters of Adam! Oh you brave and righteous souls! Today is the day of retribution. Today is the day that the devil has raised his head; he has undressed his sword; he has decorated his blade with the sacred blood of your brothers; he has violently violated the sanctity of your sisters. Today is the day of retribution. Today is the day of jihad. Today is the day of victory or martyrdom. So oh you who believe, raise your head and ready your weapon!⁸⁴

As such cultural productions illustrate, hip hop lyrics represent some of the most extremist speech at play in American society. In this arena, Muslim artists have emerged as leaders against a foe that continues to swallow individuals and communities whole. In this struggle, rappers need no assistance from their religious brethren abroad; they bring a history of rapping over beats rooted in slave spirituals that stretches all the way to Africa.⁸⁵

Perhaps the most obvious point of this essay is to convey the traditional premium placed on Muslim prisoners. It may be that better understanding of this aspect of faith can advance certain interests, including domestic security and diplomatic relations. For example, by closing Guantanamo Bay prison and bartering back prisoners, the government might help diffuse international tensions, advance national security, and perhaps even secure the return of American prisoners.

Ignoring these voices in hip hop seemingly threatens to perpetuate the status quo, and worse, may be negligent to the objectives of jihadists abroad. The situation in Europe may be instructive since there is ongoing concern about such potential unions:

⁸³ See e.g., ASSOCIATED PRESS, *Full Text of the Bin Laden Tape*, N.Y. TIMES, (Jan. 19, 2006), www.nytimes.com/2006/01/19/international/20tapefulltext.html?pagewanted=all.

⁸⁴ MUJAHIDEEN TEAM, *Day of Retribution*, on CLASH OF CIVILIZATIONS (Remarkable Current 2005).

⁸⁵ See PAMELA BRIDGEWATER ET AL., *HIP HOP AND THE LAW* xxi (Pamela Bridgewater, andré douglas pond cummings, Donald F. Tibbs eds., 2015).

Two things are evident about European hip hop today: First, as in America, some of its biggest stars are Muslim, the children of immigrants and/or converts. Second, a number of these artists are (or have been) embroiled in controversies about freedom of expression, national identity, and extremism. European government officials are increasingly worried about the influence that Muslim rap artists wield over youth, and are scrutinizing hip hop practices in poorer immigrant neighborhoods, trying to decide which Muslim hip hop artists to promote and which to push aside.⁸⁶

The United State's role as the world leader in incarceration supplies ongoing ammunition for all sides, and forces one to speculate about a future where rappers and foreign jihadists learn to collaborate. Already, hundreds of cases have admitted or attempted to admit rap lyrics as evidence in criminal court,⁸⁷ making it inevitable that rap lyrics will be similarly scrutinized in terrorism cases. Although at least one rapper has been arrested for his terroristic lyrics,⁸⁸ it seems doubtless that Muslims will be a favored target moving forward. In this scenario, the phrase "down by law" will come full circle as hip hop's hollering is sought for use as evidence in the very legal system that is the subject of scorn.

For Muslims specifically, there are additional lessons. Perhaps the most obvious is that intra-Muslim race relations would do well to imitate Farrakhan's lead of being inviting and embracing of many. As it stands, immigrant Muslims have little engagement with their African-American and Latino counterparts. Even in light of the various benedictions for Muslims to help prisoners, this may be the exception among Muslim organizations.⁸⁹

⁸⁶ Hisham Aidi, *Is Extremist Hip Hop Helping Isis?*, CICERO MAGAZINE (Aug. 25, 2014), <http://ciceromagazine.com/features/is-extremist-hip-hop-helping-isis/>; see also Asim Qureshi, *On Gangsta Rap and Jihadi Songs*, MEDIA DIVERSIFIED (June 26, 2015), <http://mediadiversified.org/2015/06/26/on-gangsta-rap-and-jihadi-songs/>; Amil Kahn, *Al-Qaeda's New Front: Jihadi Rap*, POLITICO (Aug. 31, 2014), www.politico.com/magazine/story/2014/08/al-qaedas-new-front-jihadi-rap-110481_Page2.html#VfeRgutpOFJ.

⁸⁷ See Andrea L. Dennis, *Poetic (In)Justice? Rap Music Lyrics as Art, Life, and Criminal Evidence*, 31 COLUM. J.L. & ARTS 1 (2007); MATHEW PULVER, *America's Hip-Hop Travesty: How Rap Lyrics are Being Used in Court—to Police Black Speech*, SALON (Feb. 8, 2015), www.salon.com/2015/02/08/americas_hip_hop_travesty_how_rap_lyrics_are_being_used_in_court_to_police_black_speech.

⁸⁸ *High School Rapper Arrested and Facing Terrorism Charges For Rap About Boston Marathon Bombing*, ALTERNET (May 2, 2013), www.alternet.org/news-amp-politics/high-school-rapper-arrested-and-facing-terrorism-charges-rap-about-boston-marathon.

⁸⁹ *Muslims on the Inside: Results from a Survey of Incarcerated Muslim*, CITIZENS AGAINST RECIDIVISM BLOG (June 21, 2010), <http://citizensinc.wordpress.com/2010/06/21/muslims-on-the-inside-results-from-a-survey-of-incarcerated-muslim>.

Finally, failure to be more inclusive and embracing of these groups may result in unintended consequences. For example, beyond this sonic jihad is Latino Muslim movements of terrorist activity.⁹⁰ The trend is telling since it depicts a number of Latino extremists, which is disproportionate to the U.S. Muslim population. These realities should signal to the broader Muslim community the need to engage Latino Muslims more actively. Muslims of Arab and South Asian descent must find ways to build inroads beyond their ethnic groups, lest they leave the work to others who can capitalize on the estrangement. It is not hard to fathom Farrakhan's hip hoppers linking up with Al-Zawahiri's American followers, all of which is grounded on "enemy of my enemy" logic, with police and prisons being the common denominator. Although these ideas may seem fanciful, one need only look to the Middle East and the creation of ISIL to see how the American occupation of Iraq helped to create unlikely alliances. Hip hop has been screaming about a different sort of occupation for decades—only time will tell who is listening.

⁹⁰ Consider that in the post-9/11 era, Jose Padilla, Daniel Maldonado, Antonio Martinez, Carlos Almonte, and Bryant Neal Vinas represent a trend that is taking shape despite the small percentage of Latino Muslims in the United States.