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SECULARISM AND SOCIETY:
A CLASH OF VALUES

BY

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SECULARISM AND SOCIETY:
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by

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U.S. Army War College
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As the world evolves from the former bipolar relationship between the Soviet Union and the United States as the two major superpowers in the world to a multipolar world, it is critical to understand the basic value differences that exist in different societies. Our National Security Strategy states that the United States will "continue to make a real difference in the lives of our citizens by promoting a world of open societies and open markets that is supportive of U.S. interests and consistent with American values." Is this realistic? Should we actively attempt to export our values throughout the world? Do our views of a "just war" have universal application? Before we can answer these questions, we must first study these values and the differences in value structures in the world.

The key value of separation of church and state will be described in the remainder of this paper. I will address four different models of the interplay of church and state: the Western Christian model of secularism, as in the United States; the Latin American model of secularism, influenced by Liberation Theology; the "Kemalist" model of secularism in predominately Islamic societies, as in the Republic of Turkey; and the Islamic Republic model, as seen in Iran. Finally, I will discuss some of the current developments in the world as they pertain to secularism and religious tolerance.
# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>ABSTRACT</td>
<td>iii</td>
</tr>
<tr>
<td>PREFACE</td>
<td>vii</td>
</tr>
<tr>
<td>INTRODUCTION</td>
<td>1</td>
</tr>
<tr>
<td>SECULARISM</td>
<td>4</td>
</tr>
<tr>
<td>THE WESTERN CHRISTIAN MODEL</td>
<td>4</td>
</tr>
<tr>
<td>LIBERATION THEOLOGY</td>
<td>6</td>
</tr>
<tr>
<td>KEMALISM AND ISLAM</td>
<td>9</td>
</tr>
<tr>
<td>ISLAMIC REPUBLICS</td>
<td>13</td>
</tr>
<tr>
<td>CURRENT DEVELOPMENTS</td>
<td>17</td>
</tr>
<tr>
<td>CONCLUSION</td>
<td>19</td>
</tr>
<tr>
<td>ENDNOTES</td>
<td>21</td>
</tr>
<tr>
<td>BIBLIOGRAPHY</td>
<td>25</td>
</tr>
</tbody>
</table>
THE SECOND COMING

Turning and turning in the widening gyre
The falcon cannot hear the falconer;
Things fall apart; the centre cannot hold;
Mere anarchy is loosed upon the world,
The blood-dimmed tide is loosed, and everywhere,
The ceremony of innocence is drowned;
The best lack all conviction, while the worst
Are full of passionate intensity.

Surely some revelation is at hand;
Surely the Second Coming is at hand.
The Second Coming! Hardly are those words out
When a vast image out of Spiritus Mundi
Troubles my sight: somewhere in the sands of the desert
A shape with a lion body and the head of a man
A gaze blank and pitiless as the sun,
Is moving its slow thighs, while all about it
Reel shadows of the indignant desert birds.
The darkness drops again; but now I know
The twenty centuries of stony sleep
Were vexed to nightmare by a rocking cradle,
And what rough beast, its hour come at last,
Slouches toward Bethlehem to be born?

—William Butler Yeats
"Then the Pharisees went out and laid plans to trap him in his words. They sent their disciples to him along with the Herodians. "Teacher," they said, "we know you are a man of integrity and that you teach the way of God in accordance with the truth. You aren't swayed by men, because you pay no attention to who they are. Tell us, then, what is your opinion? Is it right to pay taxes to Caesar or not?"

"But Jesus, knowing their evil intent, said, "You hypocrites, why are you trying to trap me? Show me the coin used for paying the tax." They brought him a denarius, and he asked them, "Whose portrait is this? And whose inscription?"

"Caesar's," they replied.

Then he said to them, "Give to Caesar what is Caesar's, and to God what is God's."

One of the key values in Western society is the belief in the clean separation of church and state. It is embodied in the United States Constitution and in the constitutions of many modern Western countries. The value of secularism, however, is not universal throughout the world. In the Former Soviet Union, the church was not considered an entity; rather than separation of church and state, the value was the supremacy of the state and the hoped-for non-existence of the church. In Iran, church and state are combined, with the state deriving legitimacy from the ruling clerics. In Latin America, Liberation Theology has changed the equation where church and state are separate, but the state is accountable to the power of the church for legitimacy.

Huntington describes the separation of church and state in the following manner: "In Islam, God is Caesar; in China and
Japan, Caesar is God; in Orthodoxy, God is Caesar’s junior partner.” In Liberation Theology, the people are God’s instrument to judge whether Caesar is worthy to remain in power.

Each of these models pose problems for the West: the common practice of “mirror-imaging” when looking at other societies and cultures is flawed when considering the role of the church and its impact on government. This is particularly true in countries where the dominant religion is either Judeo-Christian or Islamic because of the monotheistic characters of these two major religions, which has caused conflict between the two for centuries. As Huntington stated,

“The causes of this ongoing pattern of conflict lie not in transitory phenomena such as twelfth-century Christian passion or twentieth-century Muslim fundamentalism. They flow from the nature of the two religions and the civilizations based on them. Conflict was, on the one hand, a product of difference, particularly the Muslim concept of Islam as a way of life transcending and uniting religion and politics versus the Western Christian concept of the separate realms of God and Caesar. The conflict also stemmed, however, from their similarities. Both are monotheistic religions, which, unlike polytheistic ones, cannot easily assimilate additional deities, and which [see] the world in dualistic, us-and-them terms. Both are universalistic, claiming to be the one true faith to which all humans can adhere. Both are missionary religions... The parallel concepts of “jihad” and “crusade” not only resemble each other but distinguish these two faiths from other major world religions. Islam and Christianity, along with Judaism, also have teleological views of history in contrast to the cyclical or static views prevalent in other civilizations.”

As the world evolves from the former bipolar relationship between the Soviet Union and the United States as the two major
superpowers to a multipolar world, it is critical to understand the basic value differences that exist in different societies. Our National Security Strategy states that the United States will "continue to make a real difference in the lives of our citizens by promoting a world of open societies and open markets that is supportive of U.S. interests and consistent with American values." Is this realistic? Should we actively attempt to export our values throughout the world? Do our views of a "just war" have universal application? Before we can answer these questions, we must first study these values and the differences in value structures in the world.

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SECULARISM

THE WESTERN CHRISTIAN MODEL

"Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof..." The first amendment of the United States Constitution was designed to serve two general purposes: that the interests of a particular faith or religion will not be extended by the patronage of the state, and that individual convictions shall exist free of state interference and coercion. 5

In the United States, the church and state are considered to be two, distinct realms. Individuals belong to both realms but do not mix the two. As the American theologian Myron Augsburger wrote:

The church is made up of persons who voluntarily commit themselves to Christ, and the disciplines of the people of God. Their commitment is to the highest level of ethics as known in Jesus Christ. On the other hand, the state is committed not to Jesus Christ and the highest level of ethics, but rather to the highest level that fulfills its franchise. In our setting this is a "government of the people, by the people, and for the people," and the franchise extended to the state is conditioned by the degree of Christian ethics which is influencing society. 6

While this view reflects a traditional view for an individual Christian, the choice for the individual remains whether or not to practice Christianity, or whatever religion. The choice of religion is a matter of personal liberty, which has no bearing on the individual's citizenship. Religious liberty and choice are
essential elements of freedom. The basis of democracy and freedom may well be from a religious foundation, but truth and moral principles have adequate and generally convincing secular reasons for holding them. Adherence to a particular faith is not necessary for moral principles and ideals of conduct.

The role of government, then, is to not respect any particular religion while providing adequate governing. This is more difficult in practice, because many of the current issues today are related to moral and religious convictions, which make consensus difficult to obtain. "We are prone to extremes in the service of our holy causes." Many of these difficult matters involve such weighty issues as funding of private schools, secular humanism and abortion. These and other issues continue to create difficulty for clearly discerning the line between church and state.

The basic principle of secularism has a long history in the United States. It is considered critical for democracy and freedom to maintain religious freedom and separation of church and state. In 1963 the Supreme Court, in Abington School District v. Schempp (374 U.S. 203, 305), gave what I believe to be the best definition of secularism: "The fullest realization of true religious liberty requires that the government neither engage in nor compel religious practices, and that it work deterrence of no religious belief." This is consistent with the beliefs of the founding fathers:
James Madison believed that both religion and government could best achieve their high purposes if each were left free from the other within its respective sphere; he thus urged that the "tendency to a usurpation on one side or the other, or to a corrupting coalition or alliance between them, will be best guarded by an entire abstinance [sic] of the Government from interference in any way whatever, beyond the necessity of preserving public order, & protecting each sect against trespass on its legal rights by others."\(^\text{14}\)

**LIBERATION THEOLOGY**

The history of Liberation Theology can be largely explained by the lack of the experience of a Reformation and Counter-Reformation in Latin America.\(^\text{15}\) In the West, the Christian owes no absolute obedience to the authority of the state, but disobedience is tolerated only when the state's action is grossly opposed to basic Christian principles. However, civil disobedience has a price that must be paid, and Gandhi and Martin Luther King, Jr. confirmed respect for the state while demonstrating civil disobedience.\(^\text{16}\)

This is not true for the followers of Liberation Theology. Liberation Theology questions the authority of government, and if the government is found not worthy of and living up to the principles of Christianity, violent overthrow and a social revolution is not only justified, but imperative. Gustavo Gutierrez wrote:

*Liberation is a term which expresses a new posture in Latin America... Among more alert people today, what we have called a new awareness of Latin American reality*
is making headway. They believe that there can be authentic development for Latin America only if there is liberation from the domination exercised by the great capitalist countries, especially the most powerful, the United States of America. This liberation also implies a confrontation with these groups' natural allies, their compatriots who control national power structures. It is becoming more evident that Latin American peoples will not emerge from their present status except by means of a profound transformation, a social revolution.\(^\text{17}\)

The history of Latin America provides some explanation of how theological development took a decidedly different spin from North America and Western Europe. Colonialization of Latin America was under either Spain or Portugal, which were left out of many of the religious reforms of the remainder of Europe. Both Spain and Portugal were largely left out of advances in modern science and industry -- and the impact of the Spanish Inquisition left its mark in Latin America when considering religious tolerance.\(^\text{18}\) The abject poverty and backwardness (in relation to the rest of the Christian world), coupled with a history of repressive governments in Latin America, has provided the background for the restless poor.

Liberation theology maintains that the plight of the people is not of their own making, but rather is imposed from the outside by multi-national corporations and corrupt governments.\(^\text{19}\) Gutierrez writes that this continuing trend has caused a popular movement in Latin American that demands greater participation in the economic and political life, areas that are dominated by multinational businesses to exploit the people.\(^\text{20}\) As a result,
"the untenable circumstances of poverty, alienation, and exploitation in which the greater part of the people of Latin America live urgently demand that we find a path toward economic, social, and political liberation."\(^{21}\) This path is frequently violent.

Because of the depiction of multinational corporations as the culprit for poverty, Liberation Theology in practice rejects capitalism. The emphasis on the individual has led to a close relationship with Marxism. The resulting mix of Marxism, rejection of authority, emphasis on the individual, and religious motive combines to give violence legitimacy. "Violence is recognized as a fact, and distinctions are drawn between overt aggression, resistance, and institutionalized violence and early death that unjust structures bring."\(^{22}\)

Gutierrez summarizes his views on liberation theology with words that have mass appeal:

The theology of liberation attempts to reflect on the experience and meaning of the faith based on the commitment to abolish injustice and to build a new society; this theology must be verified by the practice of that commitment, by active, effective participation in the struggle which the exploited social classes have undertaken against their oppressors. Liberation from every form of exploitation, the possibility of a more human and more dignified life, the creation of a new man -- all pass through this struggle.\(^{23}\)

With the downfall of the Sandinista government and the slow but steady revitalization of the economy in Latin America, the Liberation Theology movement has slowed significantly. Still, the movement has great appeal in other parts of the world. The
combination of decaying economies and repressive governments is not exclusively the domain of Latin America -- and Liberation Theology, in some form, may well find its way into a future bipolar world of the industrial north versus a backwards south on a global scale. Mixed with a religious zealotry, the principle of a "just war" has no application; the ends justify the means.

KEMALISM AND ISLAM

Secularism has particular significance in Turkey. After the dismemberment of the Ottoman Empire and the establishment of the modern Turkish Republic, Kemal Atatürk felt that the path for Turkey to be fully modernized was through the West. As a result, he was an ardent secular nationalist, and felt that the separation between religion and government should be complete. As a result, Kemal Atatürk abolished the two Islamic offices of the Sultanate and Caliphate and ensured that the phrase "the religion of the Turkish state is Islam" was deleted from the Turkish Constitution. In 1937, the Turkish Republic was declared a "secular state" by a constitutional amendment. These reforms were far-reaching, but did not mean that the Turks had renounced Islam and was only seen as a Turkish reformation of Islam that would help pave the way for modernizing Turkey.

Huntington describes this approach to secularism for Islamic societies as Kemalism. He also explains two types of Kemalism:
a moderate form and an extreme form. In the moderate form, non-Western societies may modernize by adopting Western principles; in the extreme form, adopting Western principles and institutions is necessary for modernization.\(^2\) Both of these forms are relatively unproved, and Turkey does not yet provide a clear example of how well modernization has worked in this traditional non-Western society. This is also aggravated by the lack of inclusion of Turkey into the European Union and other western international institutions. Turkey is felt to be "too poor, too populous, too Muslim, too harsh, too culturally different, too everything" to be fully integrated into European institutions.\(^2\) Turkey's leaders have felt that the real reason is that "we are Muslim, and they are Christians."\(^3\)

For many years, the leaders of Turkey have not even professed their religion in public. Starting with Kemal Atatürk, it was considered to be inappropriate for the leader of Turkey to declare a religious preference, even though it was generally accepted that all were Muslim. The very act of publicly declaring a religious preference by officials in government was considered to violate strict secularism. In the 1990s, this has changed -- Turgut Özal was the first to declare that he was a Muslim, and even publicly proceeded on his ḥajj.\(^3\) The rise of the Worker's Party (Refah Partisi) and the recent outlawing of that party have also indicated the movement away from secularism in Turkish society.
 Nonetheless, Kemalism provides a model that provides a bridge between the Western model of democracy in predominately Christian countries and Islamic republics. Democracy has been relatively successful in Turkey; a market economy and a privatized mass media exist today. The Turkish form of democracy is not the same of that in the United States, but it is developing and has promise. In a country that had such radical change in its beginnings, it has been cautious in walking the tightrope between establishing a rigid separation of church and state while also accommodating and incorporating the Islamic principles held by the vast majority of its population.

The major concern for establishing a democratic and secular government in a non-Western Muslim society is in lifestyle values. Islamic values in fashion, dress, trends, and individual choices are many times not consistent with Western values. In order to force a change in Turkey, the military has seen its role as the protector of the principle of secularism and of upholding Kemal Atatürk’s vision. A prominent Turkish political scientist writes of the 1960 military coup:

Reminiscent of Atatürk’s early rationalist-positivist appraisal of the mass appeal of the state-interpreted version of Islam, the military junta leader, General Cemal Gürsel, took up the cause of praising Islam not only to secure the political and moral legitimacy of the military regime but also to check against any reactionary upsurge using Islam. “Those who blame religion for our backwardness are wrong,” he said. “No, the cause of our backwardness is not our religions but those who have misrepresented our religion to us.” The military, in short, continued the state’s political
tradition of distinguishing between two Islams -- one secular and dispassionate, the other reactionary.\(^{35}\)

Sadly, it appears that the only way that secularism has continued to survive in Turkey is by the force of authoritarian elites in power: first, by the force of personality of Kemal Atatürk; three times by the military during the coups of 1960, 1971, and 1980; and by the latest move by the Turkish Parliament to outlaw the Turkish Worker’s Party.\(^{36}\) The Turkish state has been able to maintain control over Islam and to stem the rise of Islamic fundamentalism so far -- whether this can be maintained is yet to be seen.\(^{37}\) The desire of Islamists is to force a complete change of Turkish society that can threaten secularism.\(^{38}\) Kemalism and the grand experiment in Turkey, is still in question.

Turkish leaders regularly described their country as a “bridge” between cultures. Turkey, Prime Minister Tansu Çiller argued in 1993, is both a “Western democracy” and “part of the Middle East” and “bridges two civilizations, physically and philosophically.” Reflecting this ambivalence, in public in her own country Çiller often appeared as a Muslim, but when addressing NATO she argues that “the geographic and political fact is that Turkey is a European country.” President Süleyman Demirel similarly called Turkey “a very significant bridge in a region extending from west to east, that is from Europe to China.” A bridge, however, is an artificial creation connecting two solid entities but is part of neither. When Turkey’s leaders term their country as a bridge, they euphemistically confirm that it is torn.\(^{39}\)
ISLAMIC REPUBLICS

Alvin and Heidi Toffler write of the “rise of religious fanaticism (as distinct from mere fundamentalism)” and in particular of Iran promoting “terror in the name of Islam, (while) the world looks with wonderment at the multiplying millions who seem eager to hurl themselves back into the twelfth century.” Much has been written about the rise of Iran and the radical Islamic movement, but little is understood. Former Supreme Court Justice William O. Douglas wrote in 1951:

Mohammed is a name bourne by more boys and men in the world than any other, including John and Bill. The most famous person who bore it was born in A.D. 571 at Mecca. To him was revealed the word of Allah; and he reduced that word to the Koran. He died in A.D. 632, leaving behind a militant religion and a group of fanatic followers who used the Book and the Sword to conquer the earth.

Unfortunately, many do not know much more than that short paragraph describes about Islam. Our National Security Strategy mentions very little about Iran, which many feel poses the biggest threat to the United States and the West. Our National Security Strategy states that “we would like to see Iraq’s reintegration into the international community,” but our policy for Iran is decidedly different:

As for Iran, our policy is aimed at changing the behavior of the Iranian government in several key areas, including its efforts to obtain weapons of mass destruction and missiles, its support for terrorism and groups that oppose the peace process, its attempts to undermine friendly governments in the regions, and its
development of offensive military capabilities which threaten our Gulf Cooperation Council (GCC) partners and the flow of oil. Pending changes in Iran's behavior, our goal is to contain and reduce its ability to threaten our interests. We also seek to coordinate with key allies to maximize pressures on Iran to change its course.\footnote{42}

Iran provides an interesting example for explaining the approach to secularism for Islamic republics. Iran provides, however, an extreme example for most Americans. Nonetheless, it is an example that clearly shows the different values of Islamic republics when compared to Western-style democracies.

The basic principle of sovereignty has differing meanings between Western societies and the Islamic World. After the Treaty of Augsburg in 1555 and the Treaty of Westphalia in 1648, the principle that a sovereign, territorial unit would publicly adopt the religion of the ruler was established, resolving the issue of authority between the religious leaders and the king.\footnote{43} The larger Muslim community of faith, and the blending of religious authority and governmental authority in the "clerics" leads to some conflict. This may be overstated, since "Islamic doctrine and the modern nation-state have proven quite compatible."\footnote{44} Still, fundamental differences in the approach towards sovereignty underlie some of the tension between Western democracies and Islamic republics. Indeed, Khomeini stated that there were "no frontiers in Islam," although there was a lack of inclination to enlarge national or territorial integrity into a larger whole.\footnote{45}
In traditional Islam, church and state are combined. Mohammed was both prophet and ruler; he founded a state, collected taxes, dispensed laws, and commanded armies. Even after Christianity became the state religion of Rome there was a distinction between spiritual and temporal powers. This principle of separation of church and state has never existed in classical Islam. In Christianity, the Pope provided a central authority for religious matters, but his authority (after Westphalia) did not extend beyond religious matters in the West. In modern Islam, there has not been a central authority figure for religious matters that crosses national borders since the end of the Ottoman Empire, and clerics have been detached from implementation of governmental policy. In this, the Iranian Revolution was unique:

In Iran, the revolution that overthrew the Shah in 1979 put a new spin on Shi’ite traditions. The Iranian Shi’ite community had traditionally avoided direct participation by religious leaders in government as demeaning to spiritual authority. The upheaval led by Ayatollah Ruhollah Khomeini thus represented not only a revolution in Iran, but also a revolution within the Shi’ite branch of Islam. The constitution of the Islamic Republic, the first of its kind, created structures and positions unknown to Islam in the past.

Secularism is seen as a new form of submission to the West by many Islamic intellectuals. For an Islamic state to be considered legitimate, it must follow Islamic teachings, and Islam must be the “main frame of reference for the constitution and laws of predominately Muslim countries." So, the key to
understanding the resistance to secularism in Islamic republics is not in who rules, whether it be a cleric or a non-cleric, but in whether the ruler is in accord with the teachings of Islam. There is such incredible diversity in the Islamic world that it is not conceivable that there will be a unification of Islamic countries in the near future; and in most Muslim countries, there will not be a combination of spiritual and temporal authority in one figure, similar to what has happened in Iran.

Nonetheless, there remains a concern in the future for conflict between Islam and the West due to the basic differences between values. Islam is a way of life that transcends and unites religion and politics; Christianity has the concept of different realms of God and Caesar. Both are convinced that they are the one true faith, and tolerance for the other has diminished in the last decade.49

The underlying problem for the West is not Islamic fundamentalism. It is Islam, a different civilization whose people are convinced of the superiority of their culture and are obsessed with the inferiority of their power. The problem for Islam is not the CIA or U.S. Department of Defense. It is the West, a different civilization whose people are convinced of the universality of their culture and believe that their superior, if declining, power imposes on them the obligation to extend that culture throughout the world. These are the basic ingredients that fuel conflict between Islam and the West.50
CURRENT DEVELOPMENTS

Secularism is a broad topic that has impact in many other parts of the world. There are a number of developments that may have long term impact. These include developments in the Russian Federation, India, and Bosnia.

In Russia, the Russian Orthodox Church has once again started to become a major player on the political scene. The 50 million member church endorsed Boris Yeltsin in the last election, and Yeltsin reportedly reciprocated by illegally diverting funds into church projects in Moscow.\textsuperscript{51} Yeltsin, however, vetoed legislation that would have returned the Russian Orthodox Church to a privileged status and would restrict other faiths, although he has allowed other regional governments to pass similar laws.\textsuperscript{52}

India continues to struggle with secularism, and has for a number of years. In December 1992, more than 200,000 Hindus razed the 16th Century Babri Mosque in the northern state of Uttar Pradesh.\textsuperscript{53} This critical event is indicative of the religious tension that exists in India, particularly in the predominately Muslim northern provinces of Punjab and Kashmir.\textsuperscript{54}

The Indian Constitution provided universal suffrage and guaranteed to all citizens the rights of "freedom of religion, culture, speech and assembly, equal opportunity for public employment, and protection against illegal seizure of property, arbitrary arrest, and detentions."\textsuperscript{55} Although secularism is not
mentioned or defined in the Constitution, its practice in India is generally accepted to be "religious tolerance and the equality and unity of all religions." The rapid rise to prominence of the Bharatiya Janata Parishad (BJP), with its militant Hindu nationalism and use of familiar Hindu symbols has brought in a mixture of religion and politics and threatens the future of secularism in India.

Religious intolerance in Bosnia defies description. Years of hatred, fed by violence, have created a situation that could easily erupt back into violence at any time. The combination of a major fault line running through Bosnia as a result of the split between Roman Catholicism and Eastern Orthodoxy and the Ottoman occupation of the Balkans between the 14th and 20th centuries has created a situation to which there apparently is no solution. The Ottoman rule produced descendants of those converted to Islam, and the relative religious tolerance during the occupation served to establish local churches, Orthodox and Catholic, as symbols of nationalism that persist today. Tito attempted to restrain ethnic passions during his rule, but upon his passing in 1980, the situation again erupted into violence. Although the situation today has calmed with the introduction of peacekeeping forces (IFOR/SFOR), it remains to be seen if ethnic tensions can be held in balance in Bosnia.
CONCLUSION

Secularism is a dominant value shared by many Americans. As a result, Westerners tend to "mirror-image" and expect the rest of the world to have the same values. But, Western values are not universal, nor should we expect them to be. Huntington concludes; "In the emerging world of ethnic conflict and civilizational clash, Western belief in the universality of Western culture suffers three problems: it is false; it is immoral; and it is dangerous." We would be better served to promote tolerance and understanding of other societies rather than pushing an agenda that proposes other countries adopt our values and institutions. Our national security strategy should be adjusted appropriately to reflect greater understanding of the differing values of society, rather than promoting our values as universal.

The fundamental movements are dramatic and can have significant political impact. They are, however, only the surface waves of the much broader and more fundamental religious tide that is giving a different cast to human life at the end of the twentieth century. The renewal of religion throughout the world far transcends the activities of fundamentalist extremists. In society after society it manifests itself in the daily lives and work of people and the concerns and projects of governments... "The unsecularization of the world," as George Weigel remarked "is one of the dominant facts in the late twentieth century."
ENDNOTES


3 ibid., 210-211.


7 Robert Audi, "The Separation of Church and State and the Obligations of Citizenship," Philosophy and Public Affairs 18, no. 3 (Summer 1989): 265-266.

8 Audi, 295.

9 ibid., 296.


14 ibid., 817.
15 Huntington, 70.


19 *ibid.*, 40-41.

20 Gutierrez, 88-89.

21 *ibid.*, 89.


23 Gutierrez, 307.


25 *ibid.*, 67.


27 Mansfield, 67-68.

28 Huntington, 77.

29 *ibid.*, 146.

30 *ibid.*, 146.

31 *ibid.*, 115.

32 Göle, 47.

34 Göle, 52.
35 Sakallioglu, 238-239.
36 Göle, 48.
37 Sakallioglu, 248.
38 Göle, 58.
39 Huntington, 149.
42 The White House, 27.
44 ibid., 191.
46 ibid., 61.
49 Huntington, 210-211.
50 ibid., 217-218.
52 ibid., 47.


55 Indurthy, 53.

56 ibid., 53.

57 Roy, 226.


60 ibid., 39.

61 Huntington, 310.

62 ibid., 96.
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