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INITIAL SUMMARY

This memo examines potential legal actions the UK could take against American citizens for exercising their right to free speech online or in person. It is followed by an overview of various hate speech laws in the UK and how the European and UK courts would assess such laws. In short, the UK has tools of international law available that could be used to try to extradite American citizens for the way their speech has affected the UK, and could arrest Americans for their conduct in the UK. American citizens need to be aware of these possibilities.

Collectively, the memo provides a broad overview of contrasting notions of freedom of expression and freedom of speech in the U.S., UK, and EU. The ACLJ supports fundamental rights to freedom of expression and freedom of speech across the world and intends for this memo to ground future discussions on the appropriate balance of freedoms of expression and speech online and in person with competing government interests in their limitation and regulation.

I. IMPACT ON U.S. NATIONALS AND EXTRADITION

UK officials have expressly promised to go after individuals for online activity in other countries.¹ The Metropolitan Police Commissioner Sir Mark Rowley has said in a press conference, “We will throw the full force of the law at people. And whether you’re in this country committing crimes on the streets or committing crimes from further afield online, we will come after you.”² A reporter specifically used Elon Musk, an American citizen, as an example of “people who are whipping up this kind of behavior from behind the keyboard who may be in a different country[.]”³ The Commissioner responded, “You can be guilty of offenses of incitement, of stirring up racial hatred, there are numerous terrorist offenses regarding the publishing of material,” he said.⁴ “All of those offenses are in play if people are provoking hatred and violence on the streets, and we will come after those individuals just as we will physically confront on the streets the thugs and the yobs who are taking — who are causing the problems for communities.”⁵ Prime Minister Keir Starmer has likewise warned, “I guarantee you will regret taking part in this disorder whether

¹ Alexander Hall, *UK Police Commissioner Threatens to Extradite, Jail US Citizens over Online Posts: ‘We’ll Come After You’*, FOX NEWS (Aug. 9, 2024, 8:30 PM), <https://www.foxnews.com/media/uk-police-commissioner-threatens-extradite-jail-us-citizens-over-social-media-posts-we-come-aft>.

² *Id.*

³ *Id.*

⁴ *Id.*

⁵ *Id.*

directly or those whipping up this action online.”⁶ A U.S. Congressman has sent a letter to the UK Ambassador, demanding answers about this behavior, and has indicated that no response was provided.⁷

Could Americans Visiting the United Kingdom be Arrested for Their Online Speech?

The UK of course has jurisdiction over the actions of Americans that occur within its territory. If an American, while visiting the UK, were to engage in conduct potentially in violation of UK Law, that American could face criminal charges for their “hate speech.”

Could a U.S. Citizen be Extradited for Violating the UK’s Hate Speech Laws?

As the UK Government has made explicit threats to do so, it is hardly speculation to ask whether the U.K might attempt to extradite an American citizen for violations of its laws.

Extradition from the United States to the United Kingdom is governed by treaty.⁸ Article 2(1) of the U.S.’s extradition treaty with the UK says that “[a]n offense shall be an extraditable offense if the conduct on which the offense is based is punishable under the laws in both States by deprivation of liberty for a period of one year or more by a more severe penalty.” In other words, conduct must be a felony under the laws of both countries for it to be extraditable. If the UK were to try to extradite someone for incitement but that person’s speech was protected by the First Amendment, there could be an issue as to whether that offense was not extraditable due to not being an offense under American law. Also, Article 4(1) of the treaty says that extradition will not be granted for a “political offense.” However, Article 4(2) contains a list of various offenses that are not political offenses and cases tend to define political offense quite narrowly. It is also beneficial to know generally that there is also a humanitarian exception to extradition, see *Gallina v. Fraser*, 278 F.2d 77, 79 (2d Cir. 1960), in “situations where the [accused person], upon extradition, would be subject to procedures or punishment so antipathetic to a federal court’s sense of decency as to require reexamination of [the general principle upholding extradition].”

Here is an overview of how the extradition process works: The UK first makes a request for extradition through diplomatic channels under Article 8 of this treaty, and then there is a judicial process where a magistrate would need to rule on whether a person is extraditable. Following that, the Executive Branch makes the final call on whether to surrender the person. In other words,

[t]he Secretary of State is the U.S. official responsible for determining whether to surrender a fugitive to a requesting state. Pursuant to 18 U.S.C. §§ 3186 and 3188, the Secretary or his designee makes this determination after a U.S. magistrate or district court judge transmits to the Department a certification of extradition finding

⁶ Naty Berhane Yifru (@NatyYifru), X (Aug. 4, 2024, 3:54 PM), <https://twitter.com/natyyifru/status/1820186510345261126>.

⁷ Press Release, Congressman Keith Self, Great Britain Targets Constitutional Rights of American Citizens (Aug. 23, 2024), <https://keithself.house.gov/media/press-releases/great-britain-targets-constitutional-rights-american-citizens>.

⁸ Extradition Treaty Between the United States of America and the United Kingdom of Great Britain and Northern Ireland, UK-U.S., Mar. 31, 2003, T.I.A.S. No. 07-426.

that the fugitive’s extradition would be lawful under the pertinent extradition treaty and applicable U.S. law.⁹

The purpose of an extradition hearing is to determine “whether there is ‘evidence sufficient to sustain the charge under the provisions of the proper treaty or convention,’ or, in other words, whether there is probable cause.” *Vo v. Benov*, 447 F.3d 1235, 1237 (9th Cir. 2006) (as amended) (quoting 18 U.S.C. § 1384). The extradition hearing is appealable in court and would be the primary legal context to raise the First Amendment issue.

The treaty clarifies in Article 2(4) whether it can apply to conduct outside of the UK.

If the offense has been committed outside the territory of the Requesting State, extradition shall be granted in accordance with the provisions of the Treaty if the laws in the Requested State provide for the punishment of such conduct committed outside its territory in similar circumstances. If the laws in the Requested State do not provide for the punishment of such conduct committed outside of its territory in similar circumstances, the executive authority of the Requested State, in its discretion, may grant extradition provided that all other requirements of this Treaty are met.

This provision makes clear that the ordinary preference is for allowing extradition if the laws of that country allow punishment for an activity that occurred outside its territory. However, the State Department would have discretion over extradition decisions.

As a matter of the law of nations, there are five potential routes to applying criminal jurisdiction to actions in other countries: “(1) the ‘objective’ territorial, (2) the national, (3) the protective, (4) the universal, and (5) the passive personality.” *United States v. MacAllister*, 160 F.3d 1304, 1308 (11th Cir. 1998) (citing *United States v. Benitez*, 741 F.2d 1312, 1316 (11th Cir. 1984)). Some of these are clearly inapplicable here: passive personality, for example, is when an overseas foreigner causes harm to a UK national overseas. Universal jurisdiction allows for the charging of only the most heinous crimes. National jurisdiction is the jurisdiction a country has over its own nationals.

But two of these doctrines may potentially apply. Objective territorial jurisdiction is summarized as “an act committed outside the [country] that produces substantial and detrimental effects within the [country].” *United States v. Roberts*, 1 F. Supp. 2d 601, 608 (E.D. La. 1998) (citing *United States v. Baker*, 609 F.2d 134, 138 (5th Cir. 1980)); see also *Rivard v. United States*, 375 F.2d 882, 887 (5th Cir. 1967) (citation omitted) (“Acts done outside a jurisdiction, but intended to produce and producing detrimental effects within it, justify a state in punishing the cause of the harm.”).

The “protective” jurisdictional principle can operate even more broadly: under the protective principle, “jurisdiction is based on whether the national interest is injured.” *United States v. Benitez*, 741 F.2d 1312, 1316-17 (11th Cir. 1984). In other words, this standard looks at whether the crime “had a potentially adverse effect upon the security or governmental functions

⁹ *Extraditions*, U.S. DEP’T OF STATE, <https://www.state.gov/extraditions> (last visited Jan. 13, 2025).

of the nation.” *Id.* at 1316. By virtue of this theory, a state “has jurisdiction to prescribe a rule of law attaching legal consequences to conduct outside its territory that threatens its security as a state or the operation of its governmental functions, provided the conduct is generally recognized as a crime under the law of states that have reasonably developed legal systems.” RESTATEMENT (SECOND) OF FOREIGN RELATIONS § 33 (AM. L. INST. 1965).

These two routes to jurisdiction would initially seem to provide within the UK at least a possible argument to bring action related to the actions of an Elon Musk or a similar public figure. If a US Citizen speaks in the United States in a way that the UK officials can construe as affecting their national interest or even as producing substantial effects within the country at all, they have an argument for jurisdiction and could at least theoretically seek extradition for that potential offense.

However, under the UK’s Online Safety Act, 2023 (a law which has not come into force yet), a social media user may not use online services to intentionally spread harmful false information,¹⁰ threaten individuals with death or serious harm,¹¹ and/or send flashing images or videos to someone.¹² It is still a violation of this Act when committed outside the United Kingdom, but only if the violation is committed by “an individual who is habitually resident in England and Wales or Northern Ireland” or a “body incorporated or constituted under the law of England and Wales or Northern Ireland.”¹³ In other words, these prohibitions under the Online Safety Act have been expressly limited in their scope to people who are habitually resident in the United Kingdom.

But unlike the UK’s new Online Safety Act, the Public Order Act of 1986 (POA) does not explicitly address its extraterritorial application, meaning that the default principles of extraterritoriality would potentially apply. If this is the case, it would include instances when a foreigner commits an act of hate speech while outside the UK but the speech is directed at a UK national or has adverse effects inside the UK. However, there is a presumption against the extraterritorial application of the laws. A recent UK Supreme Court case emphasized this, highlighting that “the starting point for a consideration of the scope of the enactment was the presumption in domestic law that legislation is generally not intended to have extraterritorial effect.”¹⁴ That presumption would perhaps weigh against applying the POA to actions against the UK, but it is a presumption that could be overcome by argument. (For example, a prosecutor could argue that these acts in the United States have had sufficient effects in the UK that they have severely threatened public order).

¹⁰ Online Safety Act 2023, c. 50, §§ 179(1) (UK), <https://www.legislation.gov.uk/ukpga/2023/50/part/10/crossheading/false-and-threatening-communications-offences>.

¹¹ *Id.* at § 181(1), <https://www.legislation.gov.uk/ukpga/2023/50/part/10/crossheading/false-and-threatening-communications-offences>.

¹² *Id.* at § 183(1), <https://www.legislation.gov.uk/ukpga/2023/50/part/10/crossheading/offences-of-sending-or-showing-flashing-images>.

¹³ *Id.* at § 185(1), (2), <https://www.legislation.gov.uk/ukpga/2023/50/part/10/crossheading/further-provision>.

¹⁴ *R (on the application of Marouf) v. Secretary of State for the Home Department* [2023] UKSC 23, [36] (appeal taken from Eng.).

Moreover, the Online Safety Act of 2023 (OSA) expressly applies to businesses outside the UK if they have links with the UK.¹⁵

II. HATE SPEECH LAWS IN THE UNITED KINGDOM

A. Public Order Act of 1986

The UK government has charged people under the Public Order Act of 1986 (POA). Its Section 19(1) prohibits the following:

A person who publishes or distributes written material which is threatening, abusive or insulting is guilty of an offence if—

(a)he intends thereby to stir up racial hatred, or

(b)having regard to all the circumstances racial hatred is likely to be stirred up thereby.¹⁶

Its Section 18(1) provides:

A person who uses threatening, abusive or insulting words or behaviour, or displays any written material which is threatening, abusive or insulting, is guilty of an offence if—

(a)he intends thereby to stir up racial hatred, or

(b)having regard to all the circumstances racial hatred is likely to be stirred up thereby.¹⁷

The law also has a broad definition of harassment in Section 4A(1).

A person is guilty of an offence if, with intent to cause a person harassment, alarm or distress, he—

(a)uses threatening, abusive or insulting words or behaviour, or disorderly behaviour, or

(b)displays any writing, sign or other visible representation which is threatening, abusive or insulting

thereby causing that or another person harassment, alarm or distress.¹⁸

¹⁵ Regulation Checker, OFCOM, <https://ofcomlive.my.salesforce-sites.com/formentry/RegulationChecker> (last visited Jan. 13, 2025).

¹⁶ Public Order Act 1986, c. 64, § 19(1) (UK), <https://www.legislation.gov.uk/ukpga/1986/64/section/19>.

¹⁷ *Id.* at § 18(1), <https://www.legislation.gov.uk/ukpga/1986/64/section/18>.

¹⁸ *Id.* at § 4A(1), <https://www.legislation.gov.uk/ukpga/1986/64/section/4A>.

At least one woman has been arrested over “inaccurate” information posted on social media regarding the identity of an attacker.¹⁹ She was arrested for “publishing . . . material to stir up racial hatred and false communications.”²⁰ Two men have also been arrested on suspicion of “urging people to target a hotel housing asylum seekers and refugees.”²¹

As another example of how the UK’s laws function, an army veteran was recently convicted for praying silently outside an abortion facility because he prayed within a buffer zone that took up several blocks.²² He was convicted for violating a “Public Spaces Protection Order” that prohibited protesting issues related to abortion services by any means, including by prayer or reading scripture, within a large “safe zone” of a municipality.²³ Although this conviction was pursuant to a local ordinance, it illustrates how UK laws can function.

B. Human Rights Act of 1998

There is a limited avenue under UK law to challenge laws for violating freedom of speech. The right to freedom of expression as outlined in the European Convention on Human Rights (“Convention”) is incorporated into domestic UK law through the Human Rights Act of 1998 (HRA). Section 3 of the HRA mandates that UK courts interpret legislation “[s]o far as it is possible to do so . . . in a way which is compatible with the Convention rights.” Under Section 4, a court may make a declaration of incompatibility if it is satisfied that a law is incompatible with a Convention right. But Section 4(6) states that “a declaration of incompatibility” by a court “does not affect the validity, continuing operation or enforcement of the provision in respect of which it is given; and is not binding on the parties to the proceedings in which it is made.”

However, Section 6(1) states that it is unlawful for a public authority to act in a way which is incompatible with a Convention right, and Section 7 explicitly provides a right to bring proceedings against public authorities. Section 6(2) stipulates that whether a public authority is found to have acted unlawfully by breaching a Convention right is dependent on whether the legislation made it impossible for the public authority to act in a different way.

Article 10 of the HRA states that all individuals have freedom of expression to share information, opinions, and ideas without interference from the authorities. However, Article 10(2) states that this right may be limited by law if it is “in the interests of national security, territorial integrity or public safety” or if it is necessary for preventing crime; protecting the morals,

¹⁹ *Chester Woman, 55, Arrested Over False Posts About Southport Murders*, THE GUARDIAN (Aug. 8, 2024, 7:00 PM), <https://www.theguardian.com/uk-news/article/2024/aug/08/chester-woman-55-arrested-over-false-posts-about-southport-murders>.

²⁰ *Id.*

²¹ *First Men Jailed for Riot-Related Social Media Posts*, SKY NEWS (Aug. 9, 2024, 9:42 PM), <https://news.sky.com/story/jordan-parlour-facebook-user-jailed-for-riot-related-social-media-posts-13193894>.

²² *Guilty: Army Vet Convicted for Praying Silently Near Abortion Facility*, ADF INTERNATIONAL (Oct. 16, 2024), <https://adfinternational.org/en-gb/news/guilty-army-vet-convicted-for-praying-silently-near-abortion-facility>.

²³ *Anti-social Behaviour Crime and Policing Act 2014, Section 59 Public Spaces Protection Order*, BCP COUNCIL 3–4 (Oct. 13, 2022), <https://www.bcpouncil.gov.uk/Assets/Crime-safety-and-emergencies/PSPOs/Ophir-Road-and-surrounding-area-Public-Spaces-Protection-Order-PSPO.pdf>.

reputation, or rights of others; preventing disclosure of confidential information; or protecting the judiciary’s impartiality and authority.

C. Communications Act of 2003

The Communications Act of 2003 made it a criminal offense in the UK to send a “message or other matter that is grossly offensive or of an indecent, obscene, or menacing character” through a “public electronic communications network” or “cause[] any such message or matter to be so sent.”²⁴

D. Racial and Religious Hatred Act 2006

A person is guilty under this Act if he “uses threatening words or behaviour, or displays any written material which is threatening”—written or published, with the intention of stirring up religious hatred.²⁵ This offense can be committed in a public or private setting. However, if an individual was only displaying offensive material inside his “dwelling,” which can only be heard and seen by him and those he/she shares the dwelling with, then there is no violation of this Act.²⁶ This law allows for arrests without a warrant.²⁷

E. Online Safety Act of 2023

The Online Safety Act of 2023 (OSA) is set to go into effect in early 2025. Intentional sending of false information that could cause “non-trivial psychological” or physical harm to users online is considered a violation of the OSA.²⁸ Beginning in 2025 or 2026, under this Act, social media sites will also be required to remove what is termed as “harmful content.”²⁹ The OSA updated another Act relevant to censorship, the Communications Act of 2003. Additionally, UK Prime Minister Keir Starmer has further pledged to review the OSA’s rules on online misinformation to strengthen them even more.³⁰

²⁴ Communications Act 2003, c. 21, § 127(1) (UK), <https://www.legislation.gov.uk/ukpga/2003/21/section/127>.

²⁵ [Racial and Religious Hatred Act 2006, c. 1, § 1 \(UK\)](https://www.legislation.gov.uk/ukpga/2006/1/schedule), <https://www.legislation.gov.uk/ukpga/2006/1/schedule>.

²⁶ *Id.*

²⁷ *Id.*

²⁸ *Online Safety Act: New Criminal Offences Circular*, Gov.UK (Jan. 31, 2024), <https://www.gov.uk/government/publications/online-safety-act-new-criminal-offences-circular/online-safety-act-new-criminal-offences-circular>.

²⁹ Ryan Browne, *Britain Considers Tougher Internet Safety Laws after Riots, Musk Comments — What You Need to Know*, CNBC, <https://www.cnbc.com/2024/08/14/uk-considers-tougher-online-safety-act-after-uk-riots-musk-comments.html> (Aug. 15, 2024, 2:10 AM).

³⁰ *Id.*

III. CASE LAW ON HATE SPEECH IN VARIOUS EUROPEAN COUNTRIES

A member of the British National Party displayed a poster in the window of his apartment depicting the Twin Tower in flames with the words “Islam out of Britain – Protect the British People.”³¹ He was charged with an aggravated offense under section 5 of the POA, which states:

- (1) A person is guilty of an offence if he
 - (a) uses threatening or abusive words or behaviour, or disorderly behaviour, or
 - (b) displays any writing, sign or other visible representation which is threatening or abusive, within the hearing or sight of a person likely to be caused harassment, alarm or distress thereby.
- (2) An offence under this section may be committed in a public or a private place, except that no offence is committed where the words or behaviour are used, or the writing, sign or other visible representation is displayed, by a person inside a dwelling and the other person is also inside that or another dwelling.

After his appeal was dismissed by the High Court, he appealed the decision to the European Court of Human Rights (ECtHR), stating that his rights under European Convention on Human Rights (ECHR) Article 10 were violated.³² He further argued that just because he critiqued a religion did not mean that he was being critical of its followers.³³ However, the ECtHR cited Article 17 of the Convention, which states:

Nothing in [the] Convention may be interpreted as implying for any State, group or person any right to engage in any activity or perform any act aimed at the destruction of any of the rights and freedoms set forth herein or at their limitation to a greater extent than is provided for in the Convention.³⁴

The ECtHR agreed with the assessment of the domestic courts that the poster accused an entire group of people for committing an act of terrorism and was “incompatible with the values proclaimed and guaranteed by the Convention, notably tolerance, social peace and non-discrimination.”³⁵ The ECtHR further added that the poster was an act that could fit in the category of Article 17 where the protection of Article 10 does not reach.³⁶

Another example with a similar outcome comes from Sweden. Four Swedish citizens were accused of going to a secondary school and handing out leaflets that contained statements opposing

³¹ *Norwood v. United Kingdom*, COLUMBIA UNIV.: GLOB. FREEDOM OF EXPRESSION, <https://globalfreedomofexpression.columbia.edu/cases/norwood-v-uk/> (last visited Jan. 13, 2025).

³² *Id.*

³³ *Id.*

³⁴ *Id.*

³⁵ *Id.*

³⁶ *Id.*

homosexuality.³⁷ They were charged with Chapter 2, Section 10 of the Swedish Public Order Act, which states that “a person is guilty of agitation against a national or ethnic group if they[,] in a statement or other communication that is disseminated[,] threaten or express contempt for a population group by allusion to national or ethnic origin or religious beliefs.”³⁸ The ECtHR decided that the conviction was legitimate under Article 8 of the Swedish Penal Code as there was a legitimate aim, i.e., protection of rights of others.³⁹ When specifically looking at whether there was an interference with the freedom of expression, the ECtHR considered whether the conviction was proportionate to the aim pursued.⁴⁰ The ECtHR eventually held that there was no violation of Article 10 of the Convention.⁴¹

In another case, the ECtHR upheld the sentence passed by a French court against Denis Leroy for publishing a cartoon about the September 11 terrorist attacks, highlighting his satisfaction over the outcome of the attacks. The French court convicted him as an accomplice for condoning terrorism. The ECtHR held that the French government had lawfully restricted Leroy’s freedom of expression as the cartoon went beyond merely criticizing American imperialism and rather glorified its violent destruction.⁴²

In a case out of the Netherlands, the ECtHR upheld the decision of the Hague Court of First Instance, convicting Geert Wilders of inciting discrimination and insult. During a political rally, Wilders, a right-wing politician, asked the crowd: “Do you want more or fewer Moroccans in this city and the Netherlands?”⁴³ The court found that this statement contributed to the polarization in Dutch society and, thus, Wilders was guilty of inciting discrimination.⁴⁴

In a case from Germany, the ECtHR upheld the conviction of a bishop who made a statement during a temporary visit in Germany. The bishop said that the Nazis did not have gas chambers, nor did they murder six million Jews. The German courts found him guilty of incitement to hatred. The ECtHR noted that it “had ‘always been sensitive to the historical context [] of the country concerned.’ It made a link between such context and the finding of a pressing social need to restrict convention rights.”⁴⁵ The ECtHR noted that the fine imposed by the German courts on the bishop was “very lenient.”⁴⁶

³⁷ *Case of Vejdeland and Others v. Sweden*, COLUMBIA UNIV.: GLOB. FREEDOM OF EXPRESSION, <https://globalfreedomofexpression.columbia.edu/cases/case-of-vejdeland-and-others-v-sweden/> (last visited Jan. 13, 2025).

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² *Leroy v. France*, COLUMBIA UNIV.: GLOB. FREEDOM OF EXPRESSION, <https://globalfreedomofexpression.columbia.edu/cases/leroy-v-france/> (last visited Jan. 13, 2025).

⁴³ *State of the Netherlands v. Wilders*, COLUMBIA UNIV.: GLOB. FREEDOM OF EXPRESSION, <https://globalfreedomofexpression.columbia.edu/cases/state-netherlands-v-wilders/> (last visited Jan. 13, 2025).

⁴⁴ *Id.*

⁴⁵ *Williamson v. Germany*, COLUMBIA UNIV.: GLOB. FREEDOM OF EXPRESSION, <https://globalfreedomofexpression.columbia.edu/cases/williamson-v-germany/> (last visited Jan. 13, 2025).

⁴⁶ *Id.*

In *Steel and Morris v. United Kingdom*, Steel and Morris were associated with London Greenpeace and, in the mid-1980s, London Greenpeace began an anti-McDonald's campaign.⁴⁷ In 1986, the applicants were handing out six-page leaflets entitled "What's wrong with McDonald's?"⁴⁸ McDonald's alleged that the leaflets were defamatory. The UK court ruled that the leaflet by Steel and Morris was partially defamatory.⁴⁹ Steel and Morris then applied for relief in the ECtHR.⁵⁰ One issue addressed by the ECtHR was whether the UK courts had violated Steel and Morris' right to freedom of expression under ECHR Article 10.⁵¹ The ECtHR also found that the English law of defamation, and its application in this particular case, pursued the "legitimate aim of the protection of the reputation or rights of others."⁵² However, the court found that the limitation on speech was not "necessary in a democratic society."⁵³ Considering the general interest in the free circulation of information and ideas, the possible "chilling effect," the procedural unfairness, and the disproportionate awarding of damages, the ECtHR found that there had been a violation of the right to freedom of expression under ECHR Article 10.⁵⁴

IV. CONCLUSION

This brief examination of the laws of the UK indicates that there are at least a few potential legal routes through which an American citizen could be threatened with extradition for their speech online or in person. While the U.S. Secretary of State can ultimately prevent the extradition of American citizens for exercising their First Amendment rights, it is worth noting there are significant differences in the understanding of, and limits imposed upon, freedom of expression in the U.S., UK, and EU. ACLJ will continue to work to ensure that the fundamental human rights of freedom of speech and freedom of expression are protected around the world, including working to fight against and change laws that wrongfully silence controversial religious or political views from being expressed online or in person in the public square.

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⁴⁷ *Steel and Morris v. United Kingdom*, COLUMBIA UNIV.: GLOB. FREEDOM OF EXPRESSION, <https://globalfreedomofexpression.columbia.edu/cases/steel-v-united-kingdom/> (last visited Jan. 13, 2025).

⁴⁸ *Id.*

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ *Id.*

⁵² *Id.*

⁵³ *Id.*

⁵⁴ *Id.*