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The New Middle East: Emerging Political and Ideological Trends

REPORT



Female Lawyers in Morocco, Lebanon and Kuwait Speak after 2011

Abstract

The 2011 uprisings rejuvenated demands for strengthening female citizenship within state laws in Morocco, Lebanon, and Kuwait. Female lawyers allied with women's groups and raised new claims to old calls for reforms in family law, criminal law, and nationality law. Female lawyers sought to abolish segments in the penal code that protect male violators; legislate new laws on domestic violence; equalize parental rights between mothers and fathers within family law; and endorse a female citizen's right to confer citizenship to her children in nationality law.

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Three findings based on interviews with ten female lawyers in each state during 2015 are: *First*, twenty of the thirty female lawyers interviewed question male prerogatives in state laws. *Second*, in alliance with activists, female lawyers raised old demands in new ways, such as strategically targeting specific segments of state laws, and by using media in boosting people's knowledge on legal issues. *Third*, by 2015, reforms are manifest in criminal law; incremental in family law; and absent in nationality law.

Introduction

This report conveys the engagement of female lawyers with women's civil rights in Morocco, Lebanon, and Kuwait, five years after the 2011 Arab uprisings. Through individual courage, and in collaboration with organizations, women lawyers are scrutinizing the legal privileging of male citizens when compared with female citizens in their state's family law, nationality law, and criminal law. Two-thirds of the thirty lawyers interviewed in 2015, including practicing Muslims and Christians, question embedded principles of male privileges in state laws. They are concerned about segments in state laws that incapacitate women, and empower male kin with *de jure* authority over adult women, in relation to family, work, education, health, and movement.¹

Patriarchal state laws in the Middle East and North Africa (MENA) region are, to varying degrees, embedded in personal status laws – here called family law – which regulate marriage, divorce, parenthood, custody of children, adoption, and inheritance, in ways where male kin are custodians over female kin. Adult women, for instance, may not marry or divorce without the consent of fathers or brothers, and they do not share parental custody equally over their children. In the penal code, the definition of criminal acts fall short in acknowledging sexual atrocities and domestic



violence against women and children of both sexes in the private sphere. Finally, while Morocco equalized nationality laws in 2007, women in Kuwait and Lebanon are not able to pass over nationality to their children if married to noncitizens.

The three states were chosen because autonomous women's associations have existed in them for more than five decades. Compared to other states in MENA, Kuwait, Lebanon, and to a lesser degree Morocco, have multiple independent media outlets, and less constrained avenues for freedom of expression.² Also, political order was maintained after 2011, along with autocratic features of the state apparatus which are more evident in the past five years, but nevertheless restrained.³

1. Female Lawyers: Potential Agents of Reform 2011 - 2015

During the Arab uprisings, calls for reform of the political order went hand-in-hand with women's calls for strengthened civil rights.⁴ The struggle for women's civil rights is here seen as a political conflict around female legal autonomy and civic personhood, which is not unique to women in MENA. It is a universal, historical, and a transnational experience – a gender battle which is specifically tied to a woman's ownership of a very special kind of possession, namely that of owning herself.⁵

How do female lawyers relate to legal disparities between men's and women's civil rights in their daily juridical practice? How did they seek change in patriarchal state laws over the past five years? The answers to these questions shed light on the role of female lawyers as potential agents of reform. Ten female lawyers were interviewed in each state during two weeks' fieldwork in Kuwait (March 2015), in Morocco (October – November 2015), and in Lebanon (December 2015).⁶

Female citizenship and patriarchal state laws are here central concepts of analysis, while 'female lawyers', 'legal mobilization' and 'reform' are perceived as independent, intermediate, and dependent variables respectively.⁷ Michael McCann, scholar on law and society relations, argues that legal mobilization reflects political processes whereby activists and lawyers engage in social struggles, court litigation, and social movements with the aim of transforming or reconstituting the terms of social relations of power and citizenship. According to him, studies on legal mobilization focus on the 'legal naming, blaming, and claiming' changes in the status quo.⁸

In Morocco, Lebanon, and Kuwait, some female lawyers addressed male privileges in state laws after the 2011 uprisings by naming specific segments in the penal code and in nationality law as ripe for change; blaming patriarchal readings of social norms and religious tenets in family law for disadvantaging women; and claiming legal reforms that equalize men's and women's civil rights in state laws.

The theoretical underpinnings of the study rely on the work of feminist scholars who have two things in common: first, they inquire into women's personhood in liberal and non-liberal societies; and second, they view the concept and content of 'women's interests' as something that overlaps with, but is distinct from, 'men's interests' in relation to norms, practices, institutions, and the



exercise of power, including state power.⁹ The study responds to Lisa Baldez's call to address lack of comparative research on women's political participation.¹⁰

The Rise of Female Lawyers: Figures and Features

Women in Kuwait, Lebanon, and Morocco are reaping the fruits of the government's investment in higher education since the 1960s. In the past two decades, female lawyers have come to constitute roughly a third of the total number of practicing lawyers in (percentages in brackets) Kuwait (30), Lebanon (29), and Morocco (22). Similar figures were achieved over a period of around a hundred years in Norway (31), Denmark (28), Sweden (22), and Germany (32).¹¹

Rising numbers of female lawyers is not necessarily correlated with reforms that strengthen women's civil rights. Yet the main argument here is that the marked increase in the number of professional women who are directly involved in women's legal issues, has given leverage to demands for strengthening women's rights in Morocco, Lebanon, and Kuwait during, and in the aftermath of, the 2011 uprisings.

Five observations can be made with reference to female lawyers as potential agents of reform in state laws: i) around half (fourteen) engaged in voluntary associations that address women's or children's rights; ii) two-thirds (twenty) questioned male prerogatives in different segments of state laws; iii) thirteen lawyers mentioned the importance of legislating laws on domestic violence; iv) in Kuwait and Lebanon, female lawyers are less prone to address patriarchal nationality laws directly, and more likely to oppose social security and welfare laws that premise males as heads of households after 2011; and v) in all three states, female lawyers pointed out that laws involving women's and children's rights are connected in complex ways: family law and nationality law overlap in cases related to child registration and access to nationality or public services, while criminal law and family law are entangled in cases of divorce, housing, and child custody.

Table 1 renders a rough and general overview of the type of legal cases mentioned by the female lawyers.



Table 1: General overview of the type of issues and cases mentioned by the female lawyers interviewed in 2015:

	Morocco	Lebanon	Kuwait
Underage marriage	6	3	not mentioned
Documentation / registration of marriage / proving paternity	all	all	2
Divorce/ annulment of marriage / violence / harm	all	all	all
Violence against women and children / legislation on domestic violence	3	6	4
Registration of children where both parents are citizens / nationality / access to public welfare *	6	2	not mentioned
Nationality where mother is married to noncitizen	not mentioned / irrelevant	6	8
Housing	2	3	7
Child custody (<i>hadana</i>) / guardianship (<i>wilaya</i>)/ adoption	all	all	all
Maintenance: divorced women's capability of extracting financial rights	all	5	6
Inheritance**	7	1	2
Electronic crime	not mentioned	not mentioned	1

* In Morocco and Lebanon, the registration of a child is a precondition for nationality, which again premises access to residence, education, and health services. Mothers, parents, and children face legal infringements of different kinds due to registration and administrative regimes.

** In Morocco, the issue of inheritance was hotly debated in the press during my fieldwork after the National Human Rights Council of Morocco (CNDH) released a report on 20 October 2015 which stated that 'unequal inheritance legislation contributes to increasing women's vulnerability to poverty.' The CNDH was criticized for allegedly suggesting equal inheritance between men and women as means to address women's poverty. Opponents argued that this would breach *shari'a* inheritance laws that grant a woman half of a man's share. Five of ten female Moroccan lawyers interviewed mentioned that they did not support equal inheritance rights between men and women. See point 9 in 'Gender Equality and Parity in Morocco', <http://www.cndh.ma/an/node/25012>.



Three main trends – three Rs – with reference to female lawyers’ legal mobilization and pressures to reform patriarchal state laws can be substantiated based on table 1, and the interviews with more than thirty female lawyers and legal academicians: First, female lawyers are re-reading male privileges in family law. Second, they are rebellious against violence, pressuring for amendments in the penal code, and for legislation of new laws on domestic violence. Third, they meet resistance against change by state authorities and politicians in nationality law. As such, ‘re-reading’, ‘rebellion’, and ‘resistance’ are characteristics of female lawyers’ legal mobilization in the past five years. Each trend is elaborated on below.

2. Re-Readings in Family Law after 2011

Family law is a domain in which female lawyers across the world tend to specialize. All thirty lawyers interviewed have addressed matters related to family law. Five said they no longer take such cases because of ‘too much headache, and little money’, as one put it. Female lawyers in each state re-read male privileges in family law after 2011 in different ways.

Morocco and Family Law: Substantiating the 2004 Mudawwana Reform

Hailed as the most comprehensive legal reform of women’s civil rights in the Arab world since Tunisia passed its 1956 family law, the Moroccan family law reform in 2004 – the *mudawwana* – heralded a new dawn for expanding female citizenship based on interpretations of Islamic religious texts, and inferences drawn from human rights conventions such as the 1979 UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), and the 1989 UN Convention on the Rights of the Child (CRC). The Moroccan legal reform has inspired women’s groups all over MENA, including Kuwait and Lebanon, in addressing family law reform.

A decade after the family law was reformed, female lawyers in Morocco are in general content with it. Najat Fihi explained: ‘Most importantly, the *mudawwana* changed the mentality. There is another way of thinking about the status of a woman. The man now calculates much more. He is obliged to treat the woman in another way, take into consideration that the *mudawwana* has given women rights.’

Despite an overall content, six lawyers say that serious challenges remain in implementing the law, particularly in relation to underage marriage; documentation of marriage and registration of children; and in divorced women’s capability of extracting financial rights. Some remark that divorce has gone viral. Mariama al-Rabi’i pointed out: ‘The increase in divorce cases is alarming. The judge is obliged to try to reconcile the couple. This process creates so much more work for us ... the children are victims. We have young women who leave their children in hospitals, single mothers afraid of scandal. The *mudawwana* has not succeeded in protecting children.’

Al-Rabi’i referred to obstacles that face children born to single mothers whose registration is exacerbated by administrative measures that shore up the principle of paternity as the main legitimizing principle for child registration in the Civil Status Booklet.¹² This point illustrates that although state laws articulate equality between women and men, administrative regimes support



sexual norms that condition fatherhood as the principle for legitimizing a Moroccan child's civil rights.

Three lawyers questioned rollbacks following rulings after 2011 by judges who deny women maintenance (*nafaqa*) because they initiated divorce. 'Is this a masculine reading of religious doctrine?' asked Latifa el-Hassani, read from the Qur'an, and added: 'My reading [of the religious text] supports another understanding ... I do not fight for the woman. I fight for her rights.' After finishing her law degree in civil law in 1989, el-Hassani took courses in Islamic finance and Islamic jurisprudence (*shari'a*) in Malaysia and Indonesia in 2008 and 2011. 'The *mudawwana* is extracted from the *shari'a*, therefore I have to understand the *shari'a*. By studying it, I can serve my nation with my knowledge,' she stated.

Picking up on the same line of argument, but from a secular-oriented perspective, fellow lawyer Khadija Rouggany has been active in women's associations since 1993. She clarified: 'There has always been opposition against the *mudawwana*, and this opposition continues. There are still lots of points that rest on inequality: differences between men and women in how marital relationship ends, in children's custody, in inheritance, in guardianship over children – these are based and continue to be based on inequality.' Nevertheless, Rouggany emphasized that the 2004 reform introduced changes which are 'in themselves a form of resistance', adding that 'there is a widespread masculine mentality in the field where people work in implementing the law – judges, female lawyers, male lawyers, experts – they all share a common masculine mentality in an opposition towards achieving the *mudawwana* reforms.'

In short, el-Hassani and Rouggany agree on the principle of safeguarding women's rights, from two different points of entry – one based on religious interpretations of a clerical text that supports women's financial rights, the other based on a critique of masculine mentalities which obstruct the implementation of the 2004 reforms in practice.

Lebanon and Family Law: Facing Clerical Authorities from Within

After the millennium, efforts at addressing Lebanese women's position within family law started in 2006, and were renewed between 2010 and 2011. The Family Rights Network [*shabakat huquq al-usra*], consisting of different women's associations, including the Working Women League in Lebanon (WWL), and the Democratic Women's League, was established with female lawyers comprising around one-fourth of its individual members. 'After reading all fifteen laws on personal status we agreed that child custody (*hadana*) was the one issue that concerned women most, and that it constituted an act of violence,' said lawyer and leader of the WWL Iqbal Dougan. She emphasized the interlinking of family law and violence which 'need not be physical. Barring women from seeing, or being with, their children represents mental forms of violence.' Women within the Sunni community started pressuring their religious leaders from within, approaching both politicians and clerics. In 2011, the age of children under the custody of a divorced mother was raised from seven years for boys and nine years for girls, up to twelve years for both. 'After that, we distributed responsibilities: women lawyers from each sect are making similar demands to raise the age of custody and other issues such as maintenance' explained Dougan.



Lawyer Nayla Geagea recently finalized an expert report on women's rights within family law in Lebanon after nearly three years' research.¹³ 'When you see the reforms done in other Arab states, Lebanon is the worst. We are catching up with Egypt and Morocco' she said, and informed us: 'We are now in a phase where we are concretizing issues raised in the study. For instance, introduce standardized marital contracts where Muslims women's rights are safeguarded. Similar contracts for Christian communities is more difficult. Marriage is regarded as a sacrament and therefore a religious matter.' Nonetheless, Marie-Rose Zalzal noted that Christian communities are moving towards the equalization of rights between mothers and fathers in the family: 'Recent changes have occurred towards equalization [*musharaka*] in marriage. Domestic violence or marital rape may be reason to annul marriage.'

Hanadi Chbeir el-As'ad is a member of the family committee at the Lebanese Bar Association. She intended to work on standardizing marital contracts among Muslim communities: 'Women can put any conditions they want in the marital contract: that the husband does not marry another woman, that she retains the right to divorce, or condition that children stay with her in case of divorce,' she said.

Lebanese female lawyers believe in changing status quo laws through four main avenues: administrative measures, awareness-raising, formalizing religious tenets to safeguard women's civil rights, and bottom-up pressures by women from within the religious communities. 'Seven women became members of the [ninety-member] Druze Council in October 2012. We had a party! This has never happened before,' exclaimed Dougan, emphasizing the importance of change from within. Geagea is more skeptical: 'I don't believe in Islamic feminism ideologically. But, I believe in it as a tool to obtain transitory change,' referring to re-interpretations of religious texts as means to seek reform within religious communities.

To wrap up on Lebanon: the plurality of religious laws makes pressures for reform more difficult, because change has to be addressed separately. Internal pressures started in 2011 in the Sunni community, and they had a spill-over effect to other groups where female lawyers and allies from within each sect started pressuring for change from within.

Kuwait and Family Law: Medialized Awareness-Raising

'In Kuwait, Sunni women are not able to marry who they want if the father does not agree, and Shi'a women are not able to get a divorce when they want if the husband disagrees,' Nivine Ma'rafi pointed out when I met her in court in the morning. She represented a Shi'a woman seeking divorce. 'The husband objects. We have been in a negotiation phase for two years. She is afraid of losing custody over her nine-year-old daughter, and is willing to trade her financial rights in order to obtain divorce,' al-Rifa'i explained. Later that night, she presented a weekly TV programme called *Magazine* on Scope TV, a private, Internet-based station, where women's civil rights within family law were dealt with. Two women and two men – all were lawyers – discussed various aspects of the Kuwaiti family law.



Synergy effects between female lawyers and a supportive media is particularly noticeable in Kuwait and Lebanon: nine of the thirty female lawyers interviewed (Morocco one, Lebanon three, and Kuwait five) engaged in TV programmes on legal issues, whereof five had their 'debut' after 2011.

Kuwaiti media and networking activities have become significant sites of struggle for addressing women's issues, including family law, at an extraordinarily rapid rate since Kuwaiti women received political rights in 2005, and after Kuwaiti media was liberalized in 2006. Kuwaiti women are raising claims, judging from women's propensity to articulate their own demands, and in making use of the abundant number of technological facilities and media platforms. Matters that only a decade ago were regarded as sensitive, such as the interpretation of religious tenets in family law, divorce, and domestic violence, are discussed in public in new ways.¹⁴

The medialization of family law issues is shored up by Kuwait's oldest women's association, the Women's Cultural and Social Society (established in 1963), which joined forces with the United Nations Development Programme (UNDP) in creating the *Wracati* project ['my paper' in Arabic] in 2012. Lawyer Athra' al-Rifa'i is involved in the project: 'Divorce procedures are still difficult, but divorce has become considerably easier to obtain after 2003. The law ensures Kuwaiti women dignity in terms of basic economic rights,' she informed us. Prominent lawyer and former dean at the Faculty of Law at Kuwait University (1979-1982), professor Badria al-Awadhi is a pioneer in advocating Kuwaiti women's rights. She pointed out that although the religious tide has grown stronger in recent years, Kuwaitis do not support fundamental religious leanings, but tend to prefer middle solutions: 'Kuwaiti men, in general and particularly tribalists, do not accept the principle of equality. But, Kuwaiti women have become more educated. They are able to demand their rights. The Kuwaiti family law is not perfect. But judges and the courts attend to women's problems seriously.' Lawyers perceive the legislation of Law 12 on 22 March 2015, which establishes family courts, as an important institutional reform for strengthening judicial rulings in family law, and by extension preserving women's and children's civil rights.

Importantly, Kuwait is an affluent society, and this is reflected in the state's generous welfare schemes. A new law on housing was legislated in 2011, in order to placate demands that have been pending in parliament since 1993. Seven of ten Kuwaiti lawyers interviewed mentioned housing as an important part of women's claims in cases of divorce and child custody. Conflicts regarding housing reflect the economic centrality of public housing and rent-free loans in Kuwaiti society, which are part of social welfare offered to citizens. Housing is, in principle, given to a couple when they marry. In reality, the marital home often becomes a male-controlled asset, because state laws privilege the male as head of household. Soad al-Shamaly pointed out: 'The housing law has lots of holes for women, not for men. The Kuwaiti woman received housing rights in 2011, but regrettably she gets access to housing on certain conditions: she cannot inherit from her father or brother, and the loan she gets is half that of a male.'

In Kuwait, the articulation of family law after 2011 is characterized by a more open, explicit, and medialized public sphere, where alternative views and interpretation of family law tenets are articulated more broadly than they were a decade ago. Women's enfranchisement in 2005 has been a driver for raising women-related issues higher up on the political agenda, not only by



women, but also by Islamist politicians who opposed women's enfranchisement in 2005.¹⁵ The establishment of family courts reflects political will in carrying out institutional reforms that are envisaged to safeguard women's civil rights in family law cases.

To sum up on family law in the three states: As of 2015, reforms in family law are incremental, and characterized by a plurality of small changes; in Morocco, female lawyers struggle to substantiate women's civil rights after the 2004 *mudawwana* reform; in Lebanon, they ally with women's associations in pressuring for reforms in confessional groups; and in Kuwait, medialized awareness-raising on women's rights within family law has grown stronger, on par with a decade of women's political enfranchisement.

3. Rebellion Against Violence: Women's Rights in Penal and Criminal Laws

The transformation of body politics from a low politics to a high politics arena has been particularly stunning throughout and in the aftermath of the 2011 Arab uprisings. Political sociologist Deniz Kandiyoti commented eloquently on the rise of body politics in 2013: 'What is at stake is no longer just women and their bodies but the body politic itself.'¹⁶

Before 2011, penal codes covered mainly violence in the public sphere. None of the three states had definitions for what constitutes 'domestic violence', nor was familial violence seen in legal terms as a criminal act. The 2011 uprisings yielded concerted collective efforts at articulating more forcefully the phenomenon of violence as a woman-centred political and legal issue. Two specific incidents led to turmoil on a massive scale: first, in Morocco, the suicide of 16-year-old Amina Filali in 2012, after her rapist married her, thereby evading prosecution according to Article 475 of the penal code; and second, in Lebanon, when 31-year-old Roula Yaacoub's husband was suspected, but found judicially not guilty, of beating her to death in July 2013. Rebellion against laws that did not address gendered violence was considerably reinforced after these two incidents.

Lebanon and Criminal Law: Legal Mobilization and the Protection Law in 2014

In Lebanon, *Law on the protection of women and other members of the family from familial violence* – known as the 'Protection law' or Law 293 – passed through parliament in April 2014. Kafa, an association established in 2005 that addresses all forms of violence against women, spearheaded an intensive lobbying period. Five Lebanese lawyers interviewed said the law was a success and pioneering, because judges have been quick in implementing it, and because it now positions women's claims more adequately in court.

The legislation of Law 293 is a political breakthrough and a good example of women's legal mobilization in alliance with female lawyers after 2011. Lebanese lawyer Marie-Rose Zalzal is a member of the legislation committee at the Lebanese Bar Association, and member of the Democratic Women's League. She has pushed for more than a decade on legislating a law on



domestic violence, and commented on the period between 2012 – 2014 when pressures grew stronger:

The President was a failure, Parliament was a failure, the government was a failure ... civil society, and Kafa in particular, pushed for change. There was so much pressure on the government. Every word they said against the [draft] law, or against the women, became blown up on posters everywhere. There was very strong media pressure. Each MP was forced to be accountable for what he said. Legislating the law became an electoral matter, and I think that was very important, because the nominated MP who did not adopt this law would not be elected, not only by women, but also by all those who work with human rights. Therefore this law did not only put on social pressure, but also political pressure.

Zalzal's account of the legal mobilization process reflects how law and politics were intertwined when it came to pressuring for the legislation of the Protection Law in Lebanon in 2014.

Lawyer Laila Awada leads Kafa and a team of nine volunteer lawyers. They fit well into the category of 'cause lawyers' who 'emerge as political actors – but as political actors whose work involves doing law.'¹⁷ After the passing of the 2014 Protection Law, Kafa decided to focus more on family law. This strategic decision – to sharpen focus on family law as part of the association's profile – illustrates how women's issue are tied in ways where different laws are interlinked at the legal level, as well as at the organizational levels. Awada clarified on the importance of centering attention on particular matters:

We apply a strategy where we focus on specific things. It is not that we do not support other issues [on women's rights]. But, in order to achieve an objective, we had to focus on one thing. If we had not focused on domestic violence, we would not have achieved the Law. If we had worked a little on violence, a little on political participation, a little on this and that, and talked about all sorts of issues, we would not have accomplished our goal. The same thing now with personal status. You have to make a long-term strategy.

Lawyers Zalzal and Awada shed light on how lawyers and women's groups ally with each other in addressing violence, and how the term and modes of action change according to political circumstances and windows of opportunity. With the legislation of a law on domestic violence, they work further on amending some segments, and inserting new articles such as criminalizing marital rape. Zalzal pointed out:

This was not included in the Protection Law in 2014. Even worse: they [parliamentarians] entered segments from personal status laws which they called 'marital rights' into criminal law. This has never happened before! When you state that there are marital rights, then you eliminate the foundation of a crime. Here you state that 'this person is not raping his wife. This person is exercising his rights. So, where is the crime?'

Zalzal argues thus that the Protection law is a gain, but that it has some weaknesses, which need to be amended: 'the battle continues' she pointed out.

Morocco and Criminal Law: Stalemated Rage 2012 - 2015

Amina Filali's suicide in 2012 spurred two changes in Morocco: by January 2014, Article 475 of the penal code was revoked, and a law against violence was drafted. The latter has been pending with the government since 2013, while its legislation is being pressured by lawyers and human rights groups.¹⁸



The ten Moroccan lawyers interviewed point out poverty, illiteracy, ignorance, and underage marriage as some of the main causes of gendered violence. Some lawyers, like Houria al-Hams and Lamia Kharraz, pointed out that Morocco's low level of socio-economic development is reflected at the individual level, and that illiteracy among women in rural areas constitutes a formidable challenge to strengthening women's civil rights despite the 2004 reform.

To put underage marriage, violence, and socio-economic development in a larger socio-economic context: the death of Amina Filali caused uproar because she was one of an estimated number of 60,000 – 80,000 girls aged under fifteen who are employed as low-paid domestic workers.¹⁹ The phenomenon of child domestic work in Morocco is, to an extent, related to low illiteracy rates among women in general in Morocco, which is at around forty-one per cent. On this point, Morocco differs when compared to Kuwait and Lebanon, where literacy rates among women are ninety-six and ninety-two per cent respectively. Importantly, labour force participation among female citizens in all three states lies at around twenty-six per cent, while GDP (PPP per capita) differs widely: Morocco is a low-income country with 7,040 USD, Lebanon is a middle-income country with 16,794 USD, while Kuwait is a high-income country with 79,395 USD.²⁰ These socio-economic factors give substance to significant features of violence, where illiteracy is related to impoverished and illiterate Moroccan girls. By contrast, paid domestic workers in Lebanon and Kuwait are predominantly migrant female noncitizens.

In short, domestic violence in Morocco has a double national face: it involves both domestic familial violence, and class-based violence related to poverty and the employment of rural girls.

Kuwait and Criminal Law: Pending Top-Down Concern 2011 - 2015

No legal reform has occurred in state law in Kuwait with reference to violence against women since 2011. The issue has been, however, addressed at the judicial and ministerial levels.

In 2011, the Ministry of Interior promoted law graduate and criminal investigator Hagar al-Hagiri as the leader of the criminal investigating office in the district of Sharq. Two years later, in May 2014, al-Hagiri was one of the first twenty-two women chosen by the Ministry of Justice to enter training courses in order to become public prosecutor. In due course, she may become a judge – a position which no woman has held to date in Kuwait. 'It is important for women to enter the field of investigation,' she said. 'Female plaintiffs find it difficult to tell things to male investigators, such as about being beaten. The Interior Ministry supports the expansion of women's role as investigators because they see the positive impact of women's presence in sensitive cases.'²¹

In March 2015, the Ministry of Justice and the Ministry of Religious Endowments sponsored a conference on the issue of violence against women, and promoted it as a health-related concern. Lawyer Shaikha al-Julaibi held a lecture on the issue, urged for legislating a law on domestic violence, gathering statistics, and establishing shelter homes.²²

Another lawyer, Areej Hamada, raised a case in the Court of Cassation on behalf of a woman victim of electronic crime (hereafter, e-crime). The woman's name and pictures of her were distributed through social media without her consent, along with allegations of a condescending sexual nature.



At the time of the interview, the case had been pending in court since 2013. In parallel with litigating ‘online bullying’, as she put it, Hamada pressured the government in public debates to legislate a law on e-crime: ‘It is a violent act against women’s freedoms. We need means to address new types of crime. The accused can easily be released because the law has so many holes,’ she said. In June 2015, the Kuwaiti parliament passed an e-crime law that came into effect in January 2016.²³ It targeted what lawmakers saw as acts that promote terrorism, money laundering, and human trafficking through the Internet and social media. Hamada insisted that the e-crime law should also be seen as a necessary legal tool to protect women from gendered online harassment: ‘Without legislation, we have no instruments to prosecute violators. This is also important for protecting children. Incest, for example. I have a case where I cannot do anything because there is no law,’ she complained.

Hamada’s argument illustrates that – notwithstanding the e-crime law, which targeted terrorism acts, mainly – institutional reforms with reference to violence signal top-down concern, without being supported by legislative reforms in criminal or penal laws in Kuwait.

The legislation of the e-crime law in 2016 in Kuwait reflects two other points related to the double-edged sword which women’s issues fall into in Kuwait and the MENA monarchies, including Morocco. The politics of monarchical liberalization through women-friendly policies encompass balancing the interests of autocratic hereditary rule, by holding two reins. First, by stretching a soothing hand to conservative constituencies while filtering away orthodox leanings, including non-violent and legitimate criticism, thereby harnessing authoritarian rule. Second, by lending an ear, perhaps even two after 2011, to liberal and civic-oriented secular and religious groups who support semi-democratic political systems as long as they are rules-based.²⁴

Seen from this perspective, the promotion of al-Hagiri and twenty-one other female Kuwaiti lawyers in the judicial sphere in 2014, the creation of family law courts in 2015, and opening up for women judges in the near future, are three means through which Kuwait seeks to promote its image as a modern and moderate regime while at the same time sustaining and bolstering authoritarian governance after 2011.²⁵

With these reforms, the Kuwaiti state is repositioning itself at a critical historical juncture – the 2011 Arab uprisings – on the basis of gendering national politics towards a more women-friendly track. Similar repositioning occurred in Morocco after the Casablanca bombings in 2003, when 14 bombers killed 33 civilians and injured 100, eventually quickening the legislation of the 2004 family law reform.²⁶ Likewise in Kuwait, the bombing of a Shi’a mosque in June 2015 where 27 were killed and 227 were wounded, created additional leverage to spur monarchical reverence towards harnessing religious orthodoxy. Strengthening political alliances with women’s groups is one of several means both monarchies apply to signal such a shift in policy orientation while sustaining authoritarian rule.²⁷

Importantly, the strengthening of women’s civil rights in the past five years in some MENA states, such as the hereditary monarchies, as well as Algeria, occurs under the auspices of authoritarian rule, comparable to political processes that resulted in widened female citizenship under Latin



American dictatorships such as Argentina, Brazil, and Chile between 1960 and 1990. There, ‘conservative military governments [...] introduced liberalizing reforms to laws on gender and the family’, changed marital regimes, and granted women more rights.²⁸

To sum up female lawyers’ pressures on domestic violence in the three states: in Lebanon, legal mobilization after 2012 led to a major political breakthrough in 2014 with the legislation of a Protection Law; in Morocco, the penal code was amended in 2014, and pressures on the government to pass a draft has been pending since 2013; and in Kuwait, violence is debated in the media by lawyers and women’s associations, and addressed at the institutional level, without being shored up by new legislation on domestic violence in criminal law.

4. Resistance Against Maternal *Jus Sanguinis* in Nationality Laws

Women in Lebanon and Kuwait mobilized in March 2011, demanding reforms in patriarchal nationality laws, where nationality is conferred through paternal *jus sanguinis* – that is, through the blood of male kin. Article 1 of the Lebanese nationality law formed in 1925 states that ‘[e]very person born to a Lebanese father is Lebanese’, while Article 2 of the 1959 Kuwaiti nationality law states that ‘[a]ny person born in, or outside, Kuwait whose father is [a] Kuwaiti national shall be a Kuwaiti national himself.’²⁹

In both states, legal mobilization generated resistance among decision-makers against change. The two states share contestations regarding the definition of who constitutes a citizen, the creation of statelessness as legal status (reflected in the *Bidun* in Kuwait, and the *maktumin* and *qayd ad-dars* persons in Lebanon), the politicization of census figures, the inclusion or exclusion of long-term residents based on religious or tribal affiliation, and the influx of war refugees and migrants into Lebanon and Kuwait since the 1940s, and Syrian refugees after 2011. Female citizens’ demands for equal nationality play, therefore, into deeply political issues that Lebanon and Kuwait have grappled with since their establishment as territorial states in 1920 and 1922 respectively.

Few of the female lawyers interviewed had experience with nationality law cases. ‘I tell clients that it is like throwing your money out of the window,’ said Lebanese lawyer Iqbal Dougan. She pointed out a significant political difference between litigating cases of nationality law and other types of legal cases. In nationality cases, a litigant has to raise a case against a powerful opponent: the state. Lawyers agree that reforming the nationality law is difficult. In both states, administrative measures in 2010 and 2011 reduced some of the socio-economic pressure on female citizens’ families, such as lenient residency terms and access to public education.³⁰ Nevertheless, demands for reform in the nationality law grew stronger throughout 2011 in both states, because administrative measures do not safeguard the children of female citizens after they reach eighteen years of age – they remain noncitizens in their country of birth and residence.

Whereas women’s claims to abolish paternal nationality rights are similar in both states, protests were peaceful in Lebanon, while they escalated rapidly into violent confrontations in Kuwait.³¹



Kuwait and pressures for change in nationality laws after 2011

Protests in demand of political reforms grew violent in Kuwait. Stateless Bidun, who number between five to ten per cent of the 2.2 million inhabitants – a significant number of them affiliated to Kuwaitis through tribal alliances and intermarriage – marched for the first time in demand of nationality.³² Kuwaitis, including members of parliament and well-known politicians, were imprisoned on several occasions between 2011 and 2015. By September 2014, Kuwaiti authorities had stripped nationality from thirty-three Kuwaiti protestors.³³

Despite the tense political context, Kuwaiti women mobilized. In 2011, the association Kuwaiti Women with No Limits was established, and two years later, Fatima al-Hewail, a professor in law at Kuwait University, joined as a volunteer legal advisor. ‘Not all politicians are supportive of women. The law is made and administered by males. Also, the Minister of Interior has discretionary power. We have to address this point much more seriously than we have done up to now. We have to differentiate between discretionary power and state sovereignty, when raising nationality cases in court’, she pointed out.

Lawyer Soad al-Shamaly had another opinion: ‘The nationality law is a sovereign law. It is difficult to raise anything that has to do with the nationality law in parliament. It is related to sovereignty according to what the leader of the state sees fit. I do not believe it will be changed at all,’ she said. Referring to Kuwait’s generous welfare rights, lawyer Areej Hamada pointed out: ‘Kuwaiti nationality has many privileges not all nationalities have.’ Lawyer and professor of law, Badria al-Awadhi, suggested: ‘We could introduce Saudi Arabia’s “points system”, and grant children nationality according to criteria such as birth, affiliation with citizen kin, education, and residency.’

A powerful signal was sent to legislators and rulers when Kuwait’s leading women’s associations marked International Women’s day on 8 March 2015, which coincided with Kuwaiti women’s decade of political enfranchisement. Ten women’s groups and civil society organizations rallied under the banner ‘Solidarity in support of the rights of children of a Kuwaiti female citizen married to a non-Kuwaiti’.³⁴ The issue of mixed marriages between Kuwaiti women and non-Kuwaiti males, and the legal, social and economic rights of children born out of these mixed marriages, will most likely be among the most politicized issues with regards to strengthening female citizenship in Kuwait in the future.

Lebanon and Pressures for Change in Nationality Laws after 2011

In a symbolic move in December 2011, Lebanese women donated blood, and insisted that it be analyzed to prove that it is as Lebanese as the blood of male citizens.³⁵ As of March 2011, the Collective for Research and Training on Development – *Action* (CRTD-A) (established in 2001) under the leadership of Lina Abou Habib, in alliance with several women’s groups, was a driving force behind pressures to amend the principle of paternity in nationality laws through demonstrations, sit-ins, and public debates.

Protests were peaceful, but forceful enough to pressure the government in March 2012 to establish a governmental nationality committee to address women’s demands. However, the patriarchal



character of sectarianism among Lebanon's eighteen religious groups was demonstrated when six out of seven ministers signed a memorandum in the all-male cross-religious governmental committee in January 2013, where they rejected women's claims for equal nationality rights with men. Two years later, in November 2015, parliament bolstered the right to nationality only to the male offspring of emigrants whose ancestors migrated from Lebanon between 1880 and 1920.³⁶

Opposition against changing the nationality law comes also from female lawyers, such as Fadia Ghanem, a member of the woman's committee at the Lebanese Bar Association. She shares political views with opponents of reform in nationality law: 'I am against the Lebanese woman getting the right to give her nationality to somebody. Many people leave [Lebanon] and don't come back. Also, by culture, [Christians] do not have many children. ... Muslims are the opposite. "Three children? It is shameful!" Five, six, so that we can call it a family. Here, the demographic difference appears.' By preserving the current nationality law, she seeks to maintain 'an equilibrium in demographic diversification', as she put it.

Lawyer Iqbal Dougan, who volunteers as legal advisor to the CRTD-A's nationality campaign, challenges what she calls the 'demographic myth' that haunts citizenry configurations in Lebanon: 'They insist on masculinist thinking and reject giving the Lebanese woman nationality rights to her children. It is seen as a right only for those who have Lebanese fathers or grandfathers. So, the issue is not one of demography. The case is patriarchal because if you want to add a particular group you should give [nationality] for the woman and the man.'

The Lebanese women's movement did not succeed in pushing for changing patriarchal nationality laws after pressures for reform were renewed in 2011. Ironically, the failure of legal mobilization can also be read as a success story in exposing how the Lebanese political system is characterized less by religious sectarianism than by operating as a patriarchal oligarchy. The show of force by the all-male ministers was not one of sectarian religious divisions. What was exhibited over the period of five years of pressures and counter-pressures for addressing the issue of maternal *jus sanguinis* in the Lebanese nationality law was the opposite: the overlapping of politico-ideological perceptions that Lebanon is a state that valorizes the blood of its sons more than the blood of its daughters. Ministers belonging to different religious sects agreed to disregard women's claims for equal nationality rights with men, and thereby maintain the privileges of males, in conferring membership in the Lebanese state.

According to McCann, legal mobilization generates both transformative legacies and backlash. This is 'only to be expected' according to him, because retrenchment is part of rights-based struggles: '[h]ow law matters depends on the complex, often changing dynamics of the context in which struggles occur.'³⁷ As such, pressures for reforms in nationality laws evidently touched upon policy areas that are related to institutionalized power relations markedly stronger than did societal pressures that aimed for change in family law and criminal law.

5. Conclusion

Legal mobilization with the purpose of reforming patriarchal state laws does not in itself empower or disempower women. Yet women's engagement with law generates arenas for pressure that



would otherwise not have existed. Female lawyers participated in legal mobilization in three ways between 2011 and 2015: through litigation of issues related to women in court; by allying with women's groups in strategically targeting reform in specific segments of law in penal codes and in family laws; and in raising awareness through the media about legal issues in general, and women's rights in particular.

The most visible feature in probing into female lawyers and pressures exerted on state laws is that these pressures are, predominantly, made by women lawyers who have allied themselves with other women. Sisters are doing it for themselves, indeed. While reforms occurred in family law and criminal law in the past five years, resistance was most clearly observed in pressures to change nationality laws. Importantly, female and male citizens share an interest in maintaining certain paternal rights in some fields of law, such as nationality, but not in others, such as social security systems, protection against violence, and family law. Opposition against patriarchal state laws is thus contingent on policy area.

The combination of political stability, autonomous women's groups, supportive and multiple media outlets, and less constrained avenues for freedom of expression compared to other MENA states, strengthened the leverage of female lawyers and their allies as potential agents of reform after 2011. In the two hereditary regimes particularly – Morocco and Kuwait – there was political will among rulers to strengthen female citizenship after the uprisings. In Morocco, Article 19 in a new constitution in July 2011 enshrined the principle of equality between men and women. In Kuwait, new administrative regulations attended to the socio-economic plight of Kuwaiti women married to noncitizens and their children. These changes can be seen as part of the state's response towards religious extremism and clerical orthodoxy. Hereditary polities seek to exert influence on modernization through the feminization of politics after 2011. By contrast, the patriarchal character of sectarianism sharpened considerably in Lebanon.

The historical shadow of pressures for change rests heavily on women's rights in MENA throughout and after the 2011 Uprisings. Two reflections on the condition of female citizenship in the region can be made:

First, in addition to Tunisia where the 1956 family law reform equalized to a large extent men's and women's civic status within the family, women in Morocco enjoy the strongest legal rights following the 2004 family law reform compared to other female citizens in MENA. However, low literacy levels among women coupled with relatively higher levels of poverty among the population compared with Lebanon and Kuwait modify and mitigate the full potential of Moroccan women's *de jure* rights. Despite problems facing women in Morocco in materializing the legal rights embedded in the *mudawwana*, all female lawyers who were interviewed view equal rights between women and men in family law as 'here to stay'. They point out that there is need for long-term adjustments, and that challenges remain in substantiating formal rights.

Secondly, where there's a concerted political will, there's a judicial way. This point indicates that when women's groups agree to focus on targeting one or two issues, and work collectively to amend existing laws, they succeed more in achieving reform. Before 2011, women's groups worked



on a wider range of political issues pertaining to women. With the 2011 uprisings, some political objectives materialized. In Morocco and Lebanon particularly, violence against women hit the political agenda. In both states, pressures led to minor and major legal reform in penal law and criminal law respectively.

According to McCann, backlashes – such as the counter-pressure by Lebanese politicians to legislate the Emigrant law in November 2015 – are intrinsic aspects of legal mobilization. They reflect the rallying of forces that oppose change when attempts are made ‘to challenge hierarchical social power and authoritarian state rule.’³⁸ In Kuwait and Lebanon, resistance towards reforms in nationality laws that grant women equal nationality rights with men hardened the interior meaning of citizenship rights as a system of privileges.³⁹

In light of the sizeable refugee population which constitutes roughly twenty per cent of the population in Lebanon, and a sixty per cent noncitizen majority in Kuwait, pressures to reform nationality laws resonate with counter-claims for unequal treatment of female citizens by those who are already full members of the state. Insofar as sectarianism and tribalism are bolstered and underpinned by patriarchal kinship norms and structures, nationality laws are not likely to change in Kuwait and Lebanon in the near future.

Walls that guard nationality laws have thus been raised higher following women’s strengthened pressures for reform after 2011, while windows of change have opened in other legal arenas such as family law and criminal law. This observation is supported by historical evidence: reforms that strengthened women’s legal capacity in family law in Tunisia (1956), Egypt (2000), and in Morocco (2004) occurred before nationality rights were equalized in those three states, starting with Tunisia in 1993/2010, Egypt in 2005/2011, and in Morocco in 2007. This is also the case in Norway, where women achieved legal capacity in 1888, got political rights in 1913, and achieved equal nationality rights with men as late as 1975.

Patriarchal state laws in Morocco, Lebanon, and Kuwait were shaken selectively between 2011 and 2015: vibrations hit these states where political order was retained, while change occurred within particular legal domains such as violence against women, and family law, but not in nationality law. Patriarchal state laws were shaken, but not stirred.

The New Middle East: Emerging Political and Ideological Trends (NewME)

A research project based at the University of Oslo, comprising researchers from PRIO and the UiO. There are several researchers on the project, each working on their own sub-projects within a common framework. The project started in 2011 and will be completed by the summer of 2016. The project is funded by the Norwegian Ministry of Foreign Affairs.



¹ Lawyers used Arabic terms such as *qiwama* [guardianship], *thukuri* [masculine], *manthur abawi* [paternalistic perspective], or *'aqliyya thukuriyya* [masculine mentality]. 'Patriarchal state laws' is not used by the lawyers, and reflects here the embedding of the principle of male guardianship over females along with the privileging of male over female citizens in state laws.

² *2016 World Press Freedom Index*, Reporters without Borders, <https://rsf.org/en>.

³ In the *2016 Freedom in the World Index*, Kuwait, Lebanon, and Morocco are the only three member states of the Arab League categorized as 'partly free', Tunisia is defined as 'free', while all other 22 members states of the Arab League are categorized as 'not free', <https://freedomhouse.org/report/freedom-world/freedom-world-2016>.

⁴ Fédération Internationale des ligues des Droits de l'Homme (FIDH), "Women and the Arab Spring: Taking Their Place," (Paris: International Federation for Human Rights, May 2012).

⁵ As pointed out by Carole Pateman, who defines a woman's civic legal autonomy as 'a very special kind of property that individuals are held to own their persons.' Carole Pateman, *The Sexual Contract* (Cambridge: Polity Press, 1988), 5.

⁶ The author wishes to thank female lawyers and legal academicians for generously sharing their time and views on the subject of women's civil rights in Morocco: Latifa el-Hassani (26.10.2015), Houria al-Hams (4.11.2015), Najat Fihri (27.10.2015), Lamia Kharraz (2.11.2015), Bushra al-Girnawi (2.11.2015), Fouzia Lahlou (29.10.2015), Mariama al-Riba'i (30.10.2015), *Khadija Rouggany (3.11.2015), prof. Malika Benradi (5.11.2015), Somaia Belhaddad (4.11.2015), and Asma' Rziqat (23.10.2015); in Lebanon: Marie-Rose Zalzal (1.12.2015), *Laila Awada (4.12.2015), prof. Amal Abdallah (11.12.2015), *Fadia Ghanem (9.12.2015), Nayla Geagea (4.12.2015), Nermine Siba'i (4.12.2015), prof. Marguerite Helou (10.12.2015), Hanadi Chbeir el-Ass'ad (11.12.2015), Roula Abou Chabke (8.12.2015), *Iqbal Dougan (7.12.2015), prof. Laila 'Azouri (10.12.2015), prof. Leila Saadé (27.4.2016); and in Kuwait: lawyer and prof. Badria al-Awadhi (22.4.2012, 22.3.2015, and 24.4.2016), Nawf al-Rimah (17.3.2015), prof. *Fatima al-Hewail (12.3.2015), *Areej Hamada (15.3.2015), Zahra Bin Haidar (17.3.2015), Nour Bin Haidar (17.3.2015), Shaikha al-Julaibi (15.4.2012, 23.3.2015), *Soad al-Shamaly (15.3.2015), Hagar al-Hagiri (9.3.2015), *Athra' al-Rifa'i (18.4.2012, 23.3.2015), and *Nivine Ma'rifi (16.3.2015). Participants or presenters of TV programmes on legal issues on a regular basis are marked with (*). All internet citations were last retrieved on 30 May 2016. In Kuwait and Morocco, I applied a 'go to court' strategy over five consecutive days, enquiring at random whether female lawyers were willing to be interviewed. Those who responded positively were interviewed at the lawyer's private office, or at the Lawyers' Bar Association. In Lebanon, family law is adjudicated in different religious courts, and I could not randomly secure variation. I therefore interviewed female legal academicians and female lawyers who raise cases in five out of fifteen different religious courts – the Shi'a, Sunni, Maronite Catholic, Greek Catholic (Melchite), and Greek Orthodox. In Kuwait, I did not use a questionnaire: interviews and conversations were non-structured. In Morocco and Lebanon, a questionnaire allowed open-ended answers.

⁷ Female citizenship refers to the civil, political, and social rights of female citizens which are invariably mediated by male kin through social norms and patriarchal state laws. Seen in analytical terms, expanded and contracted forms of female citizenship reflect widened or restricted female legal capacity and autonomy within state laws. Rania Maktabi, "Female Citizenship in the Middle East: Comparing Family Law Reform in Morocco, Egypt, Syria and Lebanon," *Middle East Law and Governance* 5, no. 3 (2013); "Gender, Family Law and Citizenship in Syria," *Citizenship Studies* 14, no. 5 (2010).

⁸ M. McCann, "Law and Social Movements: Contemporary Perspectives," *Annu. Rev. Law. Soc. Sci.* 2 (2006): 21, 25.

⁹ Louise Chappell and Lisa Hill, eds., *The Politics of Women's Interests: New Comparative Perspectives*, Routledge Research in Comparative Politics (London: Routledge, 2006). Feminist scholarship that I am indebted to in this study includes: Helga Maria Hernes, *Staten - Kvinner Ingen Adgang? [the State - Women No Admission]* (Oslo: Universitetsforlaget, 1982); Tove Stang Dahl, *The Muslim Family: A Study of Women's Rights in Islam* (Oslo: Scandinavian University Press, 1997); Suad Joseph, ed. *Gender and Citizenship in the Middle East* (Syracuse, N.Y.: Syracuse University Press, 2000); Ann Elizabeth Mayer, "Reform of Personal Status Law in North Africa: A Problem of Islamic or Mediterranean Laws?," *Middle East Journal* 49, no. 3 (1995); Valentine M. Moghadam, ed. *From Patriarchy to Empowerment: Women's Participation, Movements, and Rights in the Middle East, North Africa, and South Asia* (Syracuse, N.Y.: Syracuse University Press, 2007); Ziba Mir-Hosseini et al., *Gender and Equality in Muslim Family Law: Justice and Ethics in the Islamic Legal Tradition* (New York: I.B. Tauris, 2013); Mary Ann Tétreault, "Kuwait: Sex, Violence, and the Politics of Economic Restructuring," in *Women and Globalization in the Arab Middle East: Gender, Economy & Society*, ed. Eleanor Abdella Doumato and Marsha Pripstein Posusney (Lynne Renneier Publishers, 2003); Lynn Welchman, "Islamic Law: Stuck with the State?," in *Religion, Law and Tradition: Comparative Studies in Religious Law*, ed. Andrew Huxley (London: Routledge Curzon, 2002); Mala Htun and S. Laurel Weldon, "State Power, Religion, and Women's Rights: A Comparative Analysis of Family Law," *Indiana Journal of Global Legal Studies* 18, no. 1 (2011); Anne Sofie Roald, "'Benevolent Patriarchy': Palestinian Women between 'Ideal' and 'Reality'," *Islam and Christian-Muslim Relations* 24, no. 3 (2013).



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- ¹¹ Estimated 2010 figures for female lawyers and total number of lawyers in brackets: Kuwait 1,291 (4,319); Lebanon 1,597 (5,595); and Morocco 4,640 (20,715). Ethan Michelson, "Women in the Legal Profession, 1970-2010: A Study of the Global Supply of Lawyers," *Indiana Journal of Global Legal Studies* 20, no. 2 (2013): 1115-17. On the historical professional development of female lawyers, see Ulrike Schultz, "Women in the World's Legal Professions: Overview and Synthesis," in *Women in the World's Legal Professions*, ed. Gisela Shaw and Ulrike Schultz (Oxford: Hart Publishing, 2003), xxxiv.
- ¹² See point 49 and 50 in the report 'Gender Equality and Parity in Morocco', released on 20 October 2015 by The National Human Rights Council of Morocco (CNDH), <http://www.cndh.org.ma/an/thematic-reports/gender-equality-and-parity-morocco-preserving-and-implementing-aims-and-objectives>.
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³⁵ Saada Alaawa in *As-Safir*, 30 December 2011, <http://assafir.com/Article/261922>.

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³⁹ James N. Sater, "Migration and the Marginality of Citizens in the Arab Gulf Region: Human Security and High Modernist Tendencies," in *The Crisis of Citizenship in the Arab World: Citizen Rights, Religion, Clientelism, and Authoritarianism*, ed. Nils A. Butenschøn and Roel Meijer (forthcoming, December 2016).

