



WOMEN IN TERRORISM: HOW THE RISE OF FEMALE TERRORISTS IMPACTS INTERNATIONAL LAW

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Abstract

Terrorism is a topic that commands a great deal of attention in the twenty-first century. However, much of the conversation is focused upon male terrorists and the global efforts to thwart them. This Note addresses the rarely discussed involvement of women in terrorism and how their involvement should shape future counterterrorist efforts. Section I explains the roles that women take on in a variety of terrorist organizations around the world. It also addresses the changes that made both women and terrorist groups appealing to one another. Section II discusses how United States antiterrorist practices are male-centric, as well as the ways that these practices could be improved upon to take female terrorists into account. Finally, Section III explores how the United Nations has dealt with terrorism and women to date, ending with a discussion of how female terrorism could be more effectively combated in the future.

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INTRODUCTION

One needs to look no further than the headlines of any newspaper to see that terrorism is a constant and prevalent concern in the modern world. In the past year, the Islamic State of Iraq and Syria [hereinafter known as “ISIS”]¹ has consistently been at the forefront of these headlines.² Many of these stories address concerns about radicalized women as an asset³—an idea that would not have been given such consideration twenty years ago. “The number of female terrorists and suicide bombers has increased several hundredfold in the past few years,”⁴ even in conservative Islamist groups where women are not usually believed to have the same rights as men.⁵

This Note first examines how women are involved in not just ISIS and the Middle East, but in numerous terrorist organizations and countries around the globe. It is imperative to gain a full picture of female terrorist involvement in all areas, as the most common examples of terrorists (especially female terrorists) are foreign, and often Middle Eastern.⁶ Second, it examines the reasons why a growing number of women have chosen to become terrorists in recent years, as well as why

1. For further details on ISIS, see Nick Thompson, Richard Greene, & Sarah-Grace Mankarious, *ISIS: Everything You Need to Know About the Rise of the Militant Group*, CNN INT'L (Jan. 14, 2015), <http://edition.cnn.com/2015/01/14/world/isis-everything-you-need-to-know/index.html>; see also Jennifer Agiesta, *CNN/ORC Poll: ISIS a Bigger Threat than Iran, Russia*, CNN (Apr. 22, 2015), <http://www.cnn.com/2015/04/22/politics/cnn-orc-poll-isis-iran-russia/index.html> (demonstrating Americans' concern about ISIS as a “very serious threat”).

2. See, e.g., Robert Mackey, *The Case for ISIS, Made in a British Accent*, N.Y. TIMES (Jun. 20, 2014), <http://www.nytimes.com/2014/06/21/world/middleeast/the-case-for-isis-made-in-a-british-accent.html>; Ben Hubbard, *ISIS Threatens Al Qaeda as Flagship Movement of Extremists*, N.Y. TIMES, (Jun. 30, 2014), http://www.nytimes.com/2014/07/01/world/middleeast/isis-threatens-al-qaeda-as-flagship-movement-of-extremists.html?_r=0; Rukmini Callimachi, *The Horror Before the Beheadings: ISIS Hostages Endured Torture and Dashed Hopes, Freed Cellmates Say*, N.Y. TIMES (Oct. 25, 2014), <http://www.nytimes.com/2014/10/26/world/middleeast/horror-before-the-beheadings-what-isis-hostages-endured-in-syria.html>; Brian Todd, Joe Johns, & Jethro Mullen, *ISIS' Japanese Hostage Video Raises New Questions About 'Jihadi John'*, CNN INT'L (Jan. 21, 2015), <http://edition.cnn.com/2015/01/21/middleeast/isis-hostages-jihadi-john/>; Barbara Starr, *U.S. Officials Say 6,000 ISIS Fighters Killed in Battles*, CNN (Jan. 22, 2015), <http://www.cnn.com/2015/01/22/politics/us-officials-say-6000-isis-fighters-killed-in-battles/>.

3. See, e.g., *ISIS Has Female Members—And They're Terrorizing Women Who Won't Follow the Caliphate's Rules*, BUS. INSIDER (July 25, 2014), <http://www.businessinsider.com/isis-has-female-members-2014-7>; *Why Female Recruits are Vital to Terror Groups*, CBS NEWS (Jan. 12, 2015), <http://www.cbsnews.com/news/terror-groups-like-isis-al-qaeda-recruiting-more-women-for-attacks/>; Mark Townsend & Toby Helm, *ISIS Using UK Female Jihadis to Incite Terror Acts Back Home, Say Researchers*, GUARDIAN (Jan. 17, 2015), <http://www.theguardian.com/world/2015/jan/17/isis-uk-female-jihadists-database-icsr>; *At Least 50 British ISIS Women in Syria Reportedly Encouraging Terror Attacks 'Back Home'*, INQUISITR (Jan. 18, 2015), <http://www.inquisitr.com/1765612/at-least-50-british-isis-women-in-syria-reportedly-encouraging-terror-attacks-back-home/>.

4. MIA BLOOM, *BOMBSHELL: WOMEN AND TERRORISM* (2011).

5. Mia Bloom, *Death Becomes Her: The Changing Role of Women and Terrorism*, 11 GEO J. INT'L AFF. 91, 124-25 (2010-2011) [hereinafter *Death Becomes Her*].

6. Susan N. Herman, *Women and Terrorism: Keynote Address*, 31 WOMEN'S RTS. L. REP. 258, 266 (2010). Some notable exceptions are the Irish Republican Army and Chechen Black Widows, both of which have gained some notoriety and popularity in recent decades. However, people often do not think of or even know about the numerous other organizations that are relevant in the global war on terror. *Id.*

terrorist organizations believe them to be an extremely useful and effective tool in aiding their causes. Third, it explains why the United States' current anti-terrorist laws and the resulting practices around the world are not well equipped to deal with increasing numbers of female terrorists. Fourth, it examines the current efforts of the United Nations in counterterrorism and how these apply to women. After looking at current practices, some examples are presented of ways in which these policies can be improved to better protect societies against female terrorists, instead of focusing primarily on male participants. Finally, this Note looks to the future and notes the trends to watch out for in terms of terrorist organizations' latest efforts to thwart counterterrorism on a global level.

I. GENDER AND TERRORISM

As a preliminary matter, it is important to establish a definition of terrorism for the purposes of this Note. Defining terrorism is especially difficult, as nations frequently argue over whether actions should be considered terrorism or civil war.⁷ Many of the anecdotes and groups cited below will fall within that grey area. Everyone seems to agree that ISIS, al Qaeda, and the Irish Republican Army are terrorist organizations, but what about the Ku Klux Klan? Even the United Nations has not been able to create a definition of terrorism that all of its members will accept.⁸ This dilemma calls to mind the famous quote, “[o]ne man's freedom fighter is another man's terrorist.”⁹ Therefore, for the purposes of this Note, all groups (both international and within the confines of the United States) that use terror as a weapon will be considered terrorist organizations. “Terrorism is a tactic, not an enemy.”¹⁰ Therefore, the question really becomes what organizations employ terrorism; the answer to that question ranges from those who use guerrilla warfare and revolutions to left- and right-wing paramilitaries.¹¹ The most important factor to consider, beyond defining terrorism, is that it is a known fact that some women are terrorists, and that number is growing; not being able to pinpoint that number precisely does not impact the broader policy implications of this Note.

A. Female Terrorists and the Roles They Fulfill Across the Globe

Traditionally, most (if not all) of the people involved in terrorism were males. Women began to come into play in the 1900s, when some Latin American and European domestic terrorist organizations began to involve women in their

7. See generally Stathis N. Kalyvas, *The Paradox of Terrorism in Civil War*, 8 J. ETHICS 1, 97 (2004).

8. MARGARET GONZALEZ-PEREZ, *WOMEN AND TERRORISM: FEMALE ACTIVITY IN DOMESTIC AND INTERNATIONAL TERROR GROUPS* 8-12 (2008).

9. GERALD SEYMOUR, *HARRY'S GAME* (1975).

10. Herman, *supra* note 6.

11. An excellent broad definition of terrorism is employed by Margaret Gonzalez-Perez in both her book *WOMEN AND TERRORISM: FEMALE ACTIVITY IN DOMESTIC AND INTERNATIONAL TERROR GROUPS* (see *supra* note 8) and her article *Women Terrorists*: “the use or threat of violence against noncombatants by individuals, groups, or state governments for political objectives.” Margaret Gonzalez-Perez, *Women Terrorists*, 31 *WOMEN'S RTS. L. REP.* 286, 287 (2010) [hereinafter *Women Terrorists*].

efforts.¹² In Latin America, oppressive dictators and military rule took a severe toll on men and women in such countries as El Salvador, Nicaragua, Peru, Guatemala, and Mexico.¹³ The economic and educational strains associated with this oppression were especially hard on women, who were already struggling to gain upward mobility from societal restrictions.¹⁴ Women began to fight back against the dictators and military regimes, and they did not only stay within traditional roles; they fought side-by-side with men in combat and obtained leadership positions within the organizations.¹⁵

Similarly, women had significant membership in European terrorist organizations. In some groups, such as Germany's Red Army Faction and Section of June Movement, women made up close to one-third of their organizations.¹⁶ Women have also been highly involved in Basque nationalist movements within Spain, including holding some of the highest leadership positions.¹⁷ Additionally, women have maintained roles in European terrorist groups that strive to have an international impact,¹⁸ but these groups see less female participation than their domestic counterparts.¹⁹

While women have played rather pivotal leadership roles and engaged in combat in these Latin American and European terrorist groups, this was not traditionally the case in most other terrorist organizations around the world.²⁰ Women usually fulfilled minor roles and served as a support system for male leaders and combatants.²¹ In recent years, social scientists have seen a significant change in this practice, however. "Between 1985 and 2008, female suicide bombers committed over 230 attacks (representing about a quarter of the total). The percentage since 2002 in some regions exceeds as much as 50% of successful suicide terror operatives in conflicts like Sri Lanka, Turkey, and Chechnya."²² These rapidly increasing numbers present cause for concern and study in the present day, but unfortunately very little light has been shed on female involvement in terrorism to date.

Women have become involved in terrorism in other cultures as well, although Latin American and European countries were the first ones to begin utilizing women as an instrument for their cause. The U.S. and Canada have included female participants in both the Ku Klux Klan²³ ("KKK") and the Weather Underground, but they are significantly more discriminatory about allowing women to participate

12. *Death Becomes Her*, *supra* note 5, at 124.

13. *Women Terrorists*, *supra* note 11.

14. *Women Terrorists*, *supra* note 11, at 289.

15. *Women Terrorists*, *supra* note 11, at 290.

16. *Death Becomes Her*, *supra* note 5, at 124.

17. *Women Terrorists*, *supra* note 11, at 291-92.

18. Examples include Italy's Red Brigades and the Irish Republican Army [hereinafter "the IRA"]. See *Women Terrorists*, *supra* note 11, at 292-94.

19. *Id.* For more information on the difference in female participation between domestic and international terrorist organizations, see generally *Women Terrorists*, *supra* note 11.

20. *Death Becomes Her*, *supra* note 5, at 124.

21. *Death Becomes Her*, *supra* note 5, at 124.

22. *Death Becomes Her*, *supra* note 5, at 124.

23. Common popular opinion shows that people believe the Ku Klux Klan (KKK) only exists within the U.S., but, in fact, it now has branches within Canada, the United Kingdom, Ireland, and South Africa. *Women Terrorists*, *supra* note 11, at 290.

in international efforts.²⁴ These groups, rather than allowing for real input or contributions from their female members, primarily give them commands or have them fill support roles (e.g., walking in marches and distributing pamphlets).²⁵ There are no opportunities for female leadership, and instead, the leadership of these groups believes that women are unequal to men.²⁶

In Asia, there have also been women involved in terrorist organizations; one example of this is the Tamil Tigers in Sri Lanka.²⁷ The Tamil Tigers have a division specifically for women, entitled Freedom Birds, which is extremely active.²⁸ The members of Freedom Birds undergo extensive military training, are both female assassins and suicide bombers, and place women into positions of leadership.²⁹ The Freedom Birds have women taking on the same roles as the men of their counterpart organization, the Tamil Tigers.³⁰ As a result, their female members became “the world’s foremost suicide bombers and proved the tactic to be so unnerving and effective that their methods and killing innovations were studied and copied, most notably in the Middle East.”³¹

Also in Asia, a terrorist group called the Naxalites formed in India with two primary goals: to eliminate the country’s caste system and to obtain equal rights for women in their culture.³² Unsurprisingly, a group of this nature gives women greater opportunities, including training them in combat and allowing them to fulfill leadership positions.³³

In contrast to the Freedom Birds and the Naxalites are groups like Japan’s Red Army, where women merely fulfill conventional gender roles and take orders from the men.³⁴ Another example is Chechnya’s Black Widows, the terrorist organization that caused substantial concern in the months leading up to the 2014 Winter Olympics in Sochi, Russia.³⁵ Female suicide bombers in the Black Widows

24. *Women Terrorists*, *supra* note 11, at 290-91.

25. GONZALEZ-PEREZ, *supra* note 8, at 55-56.

26. *Women Terrorists*, *supra* note 11, at 291. See generally KATHLEEN M. BLEE, *INSIDE ORGANIZED RACISM: WOMEN IN THE HATE MOVEMENT* (2002).

27. See *Tamil Tigers*, ENCYCLOPEDIA BRITANNICA (Dec. 18, 2014), <http://www.britannica.com/EBchecked/topic/581988/Tamil-Tigers>.

28. See Alisa Stack-O’Connor, *Lions, Tigers, and Freedom Birds: How and Why the Liberation Tigers of Tamil Eelam Employs Women*, 19 *TERRORISM & POL. VIOLENCE* (2007).

29. *Women Terrorists*, *supra* note 11, at 294.

30. *Women Terrorists*, *supra* note 11, at 294.

31. Debra D. Zedalis, *Female Suicide Bombers*, STRATEGIC STUDIES INSTITUTE 2 (2004), available at www.strategicstudiesinstitute.army.mil/pdffiles/PUB408.pdf, quoting Amy Waldman, *Masters of Suicide Bombing: Tamil Guerrillas of Sri Lanka*, N.Y. TIMES, Jan. 14, 2003, at A1.

32. *Women Terrorists*, *supra* note 11, at 294.

33. *Women Terrorists*, *supra* note 11, at 294-95.

34. See Patricia G. Steinhoff, *Three Women Who Loved the Left: Radical Women Leaders in the Japanese Red Army*, in *RE-IMAGING JAPANESE WOMEN* 301 (Anne E. Imamura ed., 1996).

35. See, e.g. Brian Glyn Williams, *The Brides of Allah: The Terror Threat of Black-Widow Suicide Bombers to the Winter Olympics*, HUFFINGTON POST (Feb. 12, 2014), http://www.huffingtonpost.com/brian-glyn-williams/the-brides-of-allah-the-t_b_4761027.html; Ludovica Iaccino, *Sochi Winter Olympics Black Widow Terror Attack ‘Almost Certain’*, INT’L BUSINESS TIMES (Feb. 5, 2014), <http://www.ibtimes.co.uk/sochi-winter-olympics-terrorist-attack-very-likely-happen-1435265>; Stephanie Sanok Kostro & Garrett Riba, *2014 Olympics Terror Threat: The Hunt for Black Widows*, CTR. FOR STRATEGIC & INT’L STUDIES (Jan. 27, 2014), <http://csis.org/publication/2014-olympics-terror-threat-hunt-black-widows-0>.

are known for killing twice as many victims as female suicide bombers in other organizations, so women's principal role within the Black Widows is tragically serving as human bombs.³⁶ However, they are sometimes utilized for other roles, as well. Women are drawn to the Chechen terrorist movement's objective of opposing Russian control over Chechen women, and therefore tend to be fully engaged in the movement.³⁷

Finally, this Note turns to a discussion of the Middle East, the region most commonly thought of by the public in regards to terrorism. Organizations found here, such as the Palestinian Liberation Organization ("PLO") and al Qaeda, utilize women as completely expendable tools.³⁸ They occasionally fill support roles, as women do in the KKK or the Weather Underground, but they have very limited power and control over their work or even their lives in relation to these groups.³⁹ Al Qaeda recruits women as suicide bombers, but they are literally "human bombs" for the organization; their membership is not welcome in the group.⁴⁰ In recent months, ISIS has also recruited women from Europe and the U.S. to marry their male fighters and play a role within the organization.⁴¹ While these women who join ISIS are not allowed to fight, they are used in singular operations and as suicide bombers.⁴²

Therefore, women serve different roles in organizations all over the world. Some groups have allowed them to assume leadership roles and take on significant positions of power, while others still treat them as mere tools for a greater cause and fail to even see them as equals. These great differences are a reflection of the different cultures in which these organizations find their home bases. However, despite these differences, women are being used in increasing numbers on five continents, and this increase in membership has made terrorist groups even more deadly.

B. Why are More Women Becoming Terrorists?

For many years, public perception has been that women are not actors in terrorist planning or terrorist actions. There are three main reasons why this stereotype has been perpetuated.⁴³ First, women were often seen as not being

36. *Women Terrorists*, *supra* note 11, at 296.

37. *Women Terrorists*, *supra* note 11, at 296.

38. *Women Terrorists*, *supra* note 11, at 297.

39. *Women Terrorists*, *supra* note 11, at 297.

40. Many wonder why women would want to become suicide bombers for an organization that they are not allowed to join. There has been evidence of al Qaeda using emotionally or mentally disabled women for these tasks. Others are drugged, intimidated into it, or raped and then manipulated into becoming suicide bombers to avoid the shame associated with rape. A significant number of women do not join al Qaeda or fight for it by choice. *Id.* at 297. See also Richard A. Opiel, Jr., *Two Women Bombers in Iraq Had Severe Mental Problems, U.S. Says*, N.Y. TIMES (Feb. 20, 2008), http://www.nytimes.com/2008/02/20/world/africa/20iht-iraq.4.10239053.html?_r=0.

41. See *Why Female Recruits are Vital to Terror Groups*, CBS NEWS (Jan. 12, 2015), <http://www.cbsnews.com/news/terror-groups-like-isis-al-qaeda-recruiting-more-women-for-attacks/>.

42. Mark Townsend & Toby Helm, *ISIS Using UK Female Jihadis to Incite Terror Acts Back Home, Say Researchers*, GUARDIAN (Jan. 17, 2015), <http://www.theguardian.com/world/2015/jan/17/isis-uk-female-jihadists-database-icsr>.

43. Herman, *supra* note 6, at 261.

interested in or involved in politics.⁴⁴ Second, society's belief was that men and women undertook different tasks based upon their physical ability; women were not seen as capable of the warfare and fighting involved in many terrorist acts.⁴⁵ Third, there was a stereotype that a woman's main purpose was to be a mother and wife, and it was unnecessary (as well as frowned upon) for her to assume an identity or role outside of that.⁴⁶ As many of the stereotypes about women have dissipated in the twentieth and twenty-first centuries and public opinion has shifted, a great deal of the doors that were closed to women have begun opening. This has yielded overall positive results for women's rights, but along with them has come an influx in women utilizing their skills to the benefit of terrorist organizations.

It must then be asked why women have started joining terrorist organizations in increasingly larger numbers in recent years. The answer to this question is twofold. First, the women themselves and their motivations and desires have changed.⁴⁷ Second, the terrorist organizations have begun to view women as a powerful tool to aid them in their causes, and thus have begun to utilize that tool.⁴⁸

In the past few decades, terrorist organizations became especially interested in using women as an innovative tool to accomplish their goals.⁴⁹ They have discovered that the Western stereotypes of women, which portray women as mostly nonviolent, are easy to manipulate to their advantage.⁵⁰ Contrary to these stereotypes,

[f]emale terrorists are deadlier (they kill on average four times more people than their male counterparts), partly because they can penetrate targets more successfully, and are not subjected to the same intensity of scrutiny, have greater propaganda value, and create a "win-win" strategy for the terrorist organizations that employ them.⁵¹

Women have become an effective tool in the hands of terrorist organizations. This explains why these groups are increasingly utilizing them in recent years. It also demonstrates why it is even more important to actively look out for, protect against, and fight female terrorists in today's world. This can be accomplished by first examining what it is about these terrorist groups that attracts women, so the desire to join and fight can be more effectively combated.

The little research that has been done on female terrorists has been primarily anecdotal, and it often perpetuates a stereotype that women who become terrorists are "depressed, crazy, suicidal, or psychopathic," or that the men in their lives forced them into these positions.⁵² The research frequently fails to examine the complexities and numerous other potential reasons why women may be becoming

44. Herman, *supra* note 6, at 261.

45. Herman, *supra* note 6, at 261.

46. Herman, *supra* note 6, at 262.

47. See *Death Becomes Her*, *supra* note 5, at 129.

48. *Death Becomes Her*, *supra* note 5, at 129.

49. *Death Becomes Her*, *supra* note 5, at 129.

50. *Death Becomes Her*, *supra* note 5, at 129.

51. *Death Becomes Her*, *supra* note 5, at 129.

52. *Death Becomes Her*, *supra* note 5, at 126.

radicalized—a factor that is key in fighting terrorism domestically and internationally.⁵³ While the stereotypical factors may play a role in some situations,⁵⁴ there are numerous other motivating factors that play a role as well.

Up until recently, researchers have examined the motivations of male terrorists, in hopes of better pinpointing the reasons that men join these groups to stop them from joining in the first place.⁵⁵ Their research has pointed to a key difference between men and women's reasons for joining. Men more often join (or at least claim to have joined) for political rather than personal reasons; even in situations where their reasons were originally more personal, men's motivation usually tends to become more political in the long term.⁵⁶ In contrast, only a small percentage of women join for political reasons; few join because they believe that their involvement in terrorism will be good for their country and lead to better lives for their fellow citizens.⁵⁷

It appears that women may more often join for personal reasons than political ones.⁵⁸ These personal reasons can be characterized by four categories: "revenge, redemption, respect, and relationship."⁵⁹ A common example of revenge as a motivator is Chechen Black Widows, women whose husbands, brothers, or other close relatives were killed in one of the Chechen wars; these women now seek revenge on civilians and security personnel.⁶⁰ Some women seek redemption for sexual misconduct⁶¹ or for defects that make them unappealing to their society.⁶² An example of respect as a motivator is the desire to prove that women are equal to men in terms of dedication to the cause, in order to make a difference for women in

53. *Death Becomes Her*, *supra* note 5, at 126. A discussion of exactly why terrorist research (gender-related or otherwise) is so difficult to conduct can be found in several of Bloom's works. *See, e.g.*, BLOOM, *supra* note 4. *See also Death Becomes Her*, *supra* note 5.

54. It is sometimes the case that men have forced their girlfriends, lovers, or spouses to join terrorist organizations, at times using their feelings for them and other times utilizing sexual manipulation. *See, e.g.*, Crystal Sheppard, *Why Do Women Become Terrorists?*, CARE2 (Jan. 9, 2014, 6:00 AM), <http://www.care2.com/causes/why-do-women-become-terrorists.html>.

55. For more information on why men become involved with, remain involved with, and leave terrorist groups, *see generally* JOHN HORGAN, *THE PSYCHOLOGY OF TERRORISM* (2005); CTR. FOR TERRORISM AND SECURITY STUDIES, <http://www.uml.edu/Research/CTSS/default.aspx> (last visited Mar. 30, 2014) (providing examples of the research conducted and the papers written on this subject matter).

56. *Death Becomes Her*, *supra* note 5, at 133-34.

57. *Death Becomes Her*, *supra* note 5, at 131-32.

58. Farhana Ali, *Muslim Female Fighters: An Emerging Trend*, 3 TERRORISM MONITOR 21 (2005), available at http://www.jamestown.org/single/?no_cache=1&tx_ttnews%5Btt_news%5D=603#.VMU4J2TF-51.

59. *Death Becomes Her*, *supra* note 5, at 131.

60. *Black Widows – Chechen Republic – General Terminology*, TERRORISM RESEARCH & ANALYSIS CONSORTIUM, available at <http://www.trackingterrorism.org/group/black-widows-chechen-republic> (last visited Jan. 25, 2015).

61. In some cases this sexual misconduct is alleged, and in others it is real. In many of these cases, however, it is men within the terrorist groups who use the conduct to exploit the women into joining their cause. *See* Sheppard, *supra* note 54.

62. Examples of these defects include being perceived as unfit to marry or being biologically unable to have children. *See Death Becomes Her*, *supra* note 6, at 133.

their society, or in order to gain the respect of men.⁶³ Finally, brothers, fathers, or husbands/boyfriends who are terrorists lead to relationship motivation.⁶⁴

C. Women as a Powerful Weapon in the Hands of Terrorist Groups

Women once played the important role of birthing males, who would one day become the extremists that supported terrorist causes and fought terrorist fights.⁶⁵ These men served as both the strategists and the fighters for their respective organizations. Women were seen as a means for providing those tools, and very little thought was given to them beyond that. However, with anti-terrorism efforts reaching new heights in the past few decades, terrorist groups have had to change their methods in order to remain effective in fighting for their causes. They began seeing women as useful beyond procreation, and leaders of various groups started selecting them as operatives to carry out missions, because women are often the most effective in terms of completion and achieving maximum destruction—the ultimate stealth weapon.⁶⁶ Now that women have increasingly become suicide bombers, their gender is being exploited to turn them into their own breed of weapon (outside of the traditional bombs, grenades, etc. that are used).⁶⁷

One may wonder what led these organizations to begin utilizing women. There are several reasons for this, ranging from lower numbers of male members to women being more effective at creating terror and flying under the radar than men.⁶⁸ Even some of the most conservative organizations have started recruiting female terrorists, despite the fact that their culture generally sees women as inferior beings.⁶⁹ One reason for this is a loss of male recruits in recent years.⁷⁰ Another reason is that profiles of typical terrorists have not included women, so they were able to remain undetected and unnoticed in a variety of situations where their male counterparts may have been stopped.⁷¹

A third reason for bringing women to the frontlines is that people are greatly angered by the idea of female terrorists—even more so than they would be by males.⁷² Women are stereotyped as stable and nurturing figures, which is a strong juxtaposition with the idea of female suicide bombers; therefore, female terrorists are perceived as being even crazier than the men who fulfill exactly the same roles and carry out exactly the same deeds.⁷³ Terrorist organizations use this double standard to their advantage; they hope to harness the anger female terrorists incite and get an overreaction from governments, which will in turn create more opposing

63. *Women Terrorists*, *supra* note 11, at 290. See also *Death Becomes Her*, *supra* note 5, at 133.

64. *Death Becomes Her*, *supra* note 5, at 133.

65. *Death Becomes Her*, *supra* note 5 at 134.

66. *Death Becomes Her*, *supra* note 5, at 134.

67. *Death Becomes Her*, *supra* note 5, at 134.

68. *Death Becomes Her*, *supra* note 5, at 134.

69. *Death Becomes Her*, *supra* note 5, at 124-25.

70. *Death Becomes Her*, *supra* note 5 *supra* note 5, at 134.

71. *Death Becomes Her*, *supra* note 5, at 134.

72. *Death Becomes Her*, *supra* note 5, at 131. One example of the more intense rage regarding women is that when captured by governments and other “enemies”, female terrorists are often tortured and humiliated more than the males who are captured. *Death Becomes Her*, *supra* note 5, at 131.

73. *Death Becomes Her*, *supra* note 5 at 132.

anger and lead to more terrorist recruits.⁷⁴ The effectiveness of this strategy makes it all the more important that anti-terrorist efforts learn how to combat it.

Counterterrorism laws and plans cannot allow women in black robes to evade checkpoints and searches, or else women would truly become the ultimate weapon. There have been several instances of sexual abuse reported when these searches have taken place in the past; terrorist organizations fixate on these few stories in order to inspire outrage in local men.⁷⁵ They claim that one of their goals is to protect women's honor, and more people join their fight as a result of a few mistakes that have been committed by soldiers.⁷⁶ Nations must work to prevent these types of incidents if there is to be real headway made against the use of women as a secret terrorist weapon. Terrorist groups only utilize mistakes made by their enemies as fuel for the fire that leads to recruits.

Another reason for using women is the panic and anxiety that surrounds the idea of female terrorists. Somehow the idea fills the population with more fear than the idea of their male counterparts—"no one knows when or where they will strike next."⁷⁷ Women get eight times more media attention than men when they commit terrorist acts.⁷⁸ This serves a dual purpose, because the organization gets more media attention and incites more fear by using women. In addition, it can lead male terrorists to participate more, because in many of these societies, men will feel ashamed that women are doing a "man's job."⁷⁹ Therefore, women serve many more purposes than simply being more effective at getting to certain places. It's no wonder that terrorist organizations utilize them as often as they do in present times; they are a highly effective tool for promoting the group's agenda, recruitment, and completing missions.

Finally, it is important to note that despite the fact that women are useful in so many capacities, women rarely take on (or are granted) leadership roles in terrorist organizations.⁸⁰ One of the reasons for this is that in many of these societies, women are not as valuable to the group in life as they are in death.⁸¹ Until that changes, it is unlikely that more women will take on important leadership roles.

74. For example, al-Qae-da in Iraq utilizes this strategy. Local males will be greatly angered if female terrorists are searched at checkpoints or in airports, because their honor and chastity are highly valued by their culture. The negative attention created by looking under women's long black robes to see if they are carrying explosives would only strengthen al-Qae-da's cause and recruitment. *Death Becomes Her*, *supra* note 5, at 135.

75. *Death Becomes Her*, *supra* note 5, at 136. United States law provides for the search of women by female inspectors, so as to protect these sensibilities. "The Secretary of the Treasury may prescribe regulations for the search of persons and baggage and he is authorized to employ female inspectors for the examination and search of persons of their own sex...." 19 U.S.C. § 1582 (1930). *But see* Ryan Gorman, *Woman Claims She Was Sexually Assaulted During Multiple TSA Searches*, DAILY MAIL ONLINE (Jan. 18, 2014, 3:12 PM), <http://www.dailymail.co.uk/news/article-2541660/Woman-claims-sexually-assaulted-multiple-TSA-searches.html> (a woman claiming to be sexually abused, despite the fact that she was searched by a female TSA agent).

76. *See Death Becomes Her*, *supra* note 5, at 136.

77. *Death Becomes Her*, *supra* note 5, at 138.

78. *Death Becomes Her*, *supra* note 5, at 138.

79. *Death Becomes Her*, *supra* note 5, at 138.

80. *Death Becomes Her*, *supra* note 5, at 139. Even groups who have very high percentages of female bombers do not see many (or often any) female leaders. *Death Becomes Her*, *supra* note 5, at 139.

81. *Death Becomes Her*, *supra* note 5, at 139.

However, they will likely continue to be utilized as operatives for as long as they serve a useful purpose for the organization. Counterterrorist efforts are beginning to become aware of the increased use of women, and have begun to check them more, thus reducing their power. However, these efforts have clearly not been effective enough, as women are still finding ways to cause great harm, and often are more effective than male terrorists.⁸²

II. THE CURRENT STATE OF UNITED STATES COUNTER-TERRORISM LAW AS IT AFFECTS WOMEN AND THE CHANGES THAT SHOULD BE MADE IN THE FUTURE

The above overview demonstrates how terrorist organizations and their female members have made their way to the current state of affairs. Both women and terrorist groups have typical reasons for seeking one another out. While some organizations' recruitment may be more difficult to stop, such as those that force women to join their ranks against their will, terrorist recruitment can be fought in two ways. One way is to try to eliminate the incentives for women to join these types of organizations. Now that it is understood why they are joining in the first place, this will be easier to do, but it still presents a daunting and challenging task for lawmakers. The second way is to try to make women less effective tools to terrorist groups. This is the easier approach to take, and the remainder of this Note focuses on it. In order to figure out how to make women less useful to terrorist organizations, we must first determine what the current state of United States law is, so it can be built upon and changed accordingly.

A. *The USA Patriot Act and Gender Profiling*

The United States has laws that aim to protect the American people from terrorist acts. The USA Patriot Act⁸³ was implemented in a time of utter turmoil, following the terrorist attacks of September 11, 2001 on the World Trade Center in New York, New York. It was drafted before the attacks took place, and Congress had previously rejected many of its clauses and provisions.⁸⁴ However, once the attacks ended and the American people were in a state of panic, the Act was easily passed by the House of Representatives and the Senate, and signed into law by President George W. Bush in October 2001.⁸⁵ The Act gives the Federal Bureau of Investigation ("FBI") and the Central Intelligence Agency ("CIA") the authority to share information that they received from intercepting wire, oral, and electronic communications relating to terrorism.⁸⁶ In addition, the Act lowers the standard of

82. *Death Becomes Her*, *supra* note 5, at 129.

83. The USA Patriot Act stands for "Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act." *See* Uniting and Strengthening America by Providing Appropriate Tools to Intercept and Obstruct Terrorism Act (USA Patriot Act) of 2001, Pub. L. No. 107-56, 115 Stat. 272.

84. Ashley Nicole Reynolds, *So You Think a Woman Can't Carry Out a Suicide Bombing? Terrorism, Homeland Security, and Gender Profiling: Legal Discrimination for National Security*, 13 WM. & MARY J. WOMEN & L. 667, 676 (2007).

85. *Id.*

86. *Id.*

proof required for a search warrant to the minimal standard of “reasonable cause”⁸⁷ and allows for seven days detention without formal charges for any non-U.S. citizen that the U.S. Attorney General may deem to be a national security threat.⁸⁸

One of the consequences of the USA Patriot Act has been racial and gender profiling. While the U.S. claims to be against these practices, and President George W. Bush pledged to end racial profiling in 2001, the United States has continued to endorse policies that encourage these types of profiling.⁸⁹ These policies may be successful to an extent, but it is important to question gender profiling that strictly searches for male terrorist suspects.⁹⁰ As was discussed earlier,⁹¹ this increases women’s access to soft targets in the United States and allows women and their parent organizations to take advantage of this profiling.⁹² This is not to say that profiling should be encouraged in efforts to combat terrorism, but if the United States is going to continue to use it, U.S. officials must make an effort to be more accurate in determining who could be a potential terrorist. The profile of women involved in terrorism is very different from their male counterparts,⁹³ and this needs to become public knowledge, so that when implementing laws like the USA Patriot Act, law enforcement can be more successful in identifying terrorists. Of course, a more favorable alternative may be eliminating profiling altogether, as it is not always successful, and is generally unpopular with the public.⁹⁴ Either way, changes need to be made in both American law and its implementation across the country to ensure that U.S. law enforcement is not only targeting male terrorist suspects.

B. U.S. Law Enforcement Practices Regarding Female Terrorists

Studies on the U.S. government’s counterterrorist efforts have begun to show an increased focus on the link between gender and counterterrorism.⁹⁵ However, efforts to incorporate women in counterterrorism investigations have been minimal.⁹⁶ For example, the FBI’s terrorist investigations have been found to mainly investigate men, and usually only question women based upon their relationship to male suspects.⁹⁷ Women have also been utilized by law

87. *Id.* at 677. The standard required for a search warrant prior to the USA Patriot Act was “probable cause”, defined as “a reasonable ground to suspect that a person has committed or is committing a crime or that a place contains specific items connected with a crime.” BLACK’S LAW DICTIONARY 1239 (8th ed. 2004).

88. *Id.* at 678.

89. *Id.* at 689-92.

90. Reynolds, *supra* note 84, at 697-700.

91. See *Death Becomes Her*, *supra* note 53.

92. Reynolds, *supra* note 84, at 700.

93. One example is that Palestinian female terrorists are generally better educated than the average Palestinian women, while that may not always be true for men. Reynolds, *supra* note 84, at 700.

94. CTR. FOR HUMAN RIGHTS AND GLOBAL JUST., A DECADE LOST: LOCATING GENDER IN U.S. COUNTER-TERRORISM N.Y.U. SCH. OF LAW 83 (2011), available at <http://chrgj.org/wp-content/uploads/2012/07/locatinggender.pdf> [hereinafter A DECADE LOST].

95. *Id.* at 13-14.

96. *Id.* at 41.

97. *Id.* at 82.

enforcement as leverage to pressure men into becoming informants for the FBI.⁹⁸ Going forward, there need to be more efforts to examine women as suspects themselves, and not merely as the family members or friends of potential terrorists. The United States could begin this process through training of law enforcement officials. For instance, the International Law Enforcement Academy's training does not specifically focus on the increasing number of female terrorists, although they do claim to occasionally include examples of women as terrorists in case studies.⁹⁹

United States law enforcement works to implement preventative measures, which are meant to stop terrorist recruitment.¹⁰⁰ As discussed previously, there is less scrutiny of women than men by U.S. officials, which increases female recruitment by terrorists.¹⁰¹ Additionally, the U.S. government has been creating and expanding community engagement programs to counter terrorist recruitment efforts, but there has been a distinct gender bias in these efforts that leaves women open to engagement.¹⁰² Preventing women from joining terrorist groups would be a clear victory for the "war on terror," and it is important to include women in these efforts. Subjecting women to the same scrutiny that men receive and increasing the community outreach efforts to include women as well as men would both be positive steps toward recruitment prevention.

Sometimes, however, it is impossible to stop women (and, for that matter, men) from becoming terrorists and radicals. It is not practical to believe that terrorism can be eliminated solely by recruitment prevention, and therefore it is also important to have equality for women in regards to interrogation, prosecution, and detention.¹⁰³ CIA detention facilities, Guantanamo Bay, and U.S. terrorism-related prosecutions have all principally targeted men following September 11, 2001.¹⁰⁴ While women are taken in for interrogation, prosecution, and detention less frequently, sometimes cases arise where they are taken into custody.¹⁰⁵ In these cases, women are often treated in ways that violate their international human rights.¹⁰⁶ There have been documented reports of sexual abuse against female detainees in U.S. detention facilities located in Iraq, as well as reports of U.S. soldiers torturing women who are suspected terrorists.¹⁰⁷ As was poignantly pointed out by the Prime Minister of Iraq, "America is the symbol of democracy, but then you have the abuses at Abu Ghraib."¹⁰⁸ In order for the U.S. to effectively combat terrorism and the increasing involvement of women, they need to be treated

98. *Id.*

99. *Id.* Similar lack of awareness is seen globally; The Turkish National Police do not actively seek out female terrorists as members of the Kurdistan Workers' Party (PKK), despite the fact that it is believed that women carried out seventy-five percent of their attacks in December 2009. *Id.* at 82-83.

100. *Id.* at 81.

101. *Id.* at 84.

102. *Id.* It is also important to note that these community outreach efforts principally take place in Muslim communities, and it is essential to expand these efforts to other nationalities and religious affiliations, as not all terrorists are Muslims.

103. *Id.* at 86.

104. *Id.*

105. *Id.* at 87.

106. *Id.* at 87.

107. *Id.*

108. *Id.*

in the same regard as men and as fellow human beings. This is both a failing of the American people and the U.S. government, who need to become more proactive in creating procedures to stop this treatment.

Finally, in terms of rehabilitative efforts following terrorist engagement, U.S. government practices are gender-biased. Some Guantanamo returnees are eligible for Saudi Arabia's Prevention, Rehabilitation, and Aftercare Program, designed to combat the risks of the detainee returning to terrorism, but women are excluded from these programs.¹⁰⁹ The stated reason for this exclusion is that "Saudi Arabia does not take women as seriously as men as terrorists."¹¹⁰ By excluding women from these efforts to rehabilitate former terrorists, which would keep them from returning to their former lifestyle and radicalism, women are more likely to re-engage in terrorist efforts upon returning to their home country.¹¹¹ This is a strong risk for many terrorists who are detained or punished temporarily, and then are allowed to return to the environment that made them terrorists in the first place. More efforts need to be made to include women in the rehabilitative programs that already exist, or perhaps to create programs specifically for women that will address their individual needs.

It is important for U.S. law enforcement to begin implementing measures that target female terrorist involvement at three points—before recruitment; during interrogation, prosecution, and detention; and during rehabilitation. It is only through a three-pronged effort that the U.S. government will begin to effectively deal with women terrorists and positively impact counter-terrorism both within the United States and around the world.

III. THE CURRENT STATE OF UNITED NATIONS COUNTER-TERRORISM LAW AS IT AFFECTS WOMEN AND THE CHANGES THAT SHOULD BE MADE IN THE FUTURE

In addition to United States initiatives, both within its borders and internationally, it is important to look at the predominant international law for combating terrorism; this can be found by turning to the resolutions and reports of the United Nations. The United Nations, an international organization with 193 member-states including the United States, takes on a wide range of issues, including peacekeeping, protection of human rights, and counterterrorism efforts.¹¹² Through both the General Assembly and the Security Council of the United Nations, numerous counterterrorist efforts have been implemented.¹¹³ The United Nations has also seen implementation of resolutions that are supposed to

109. *Id.* at 90-91.

110. *Id.* at 91.

111. *See, e.g.,* Cheryl Chumley, *116 Ex-Gitmo Detainees 'Re-Engaged' in Terrorism*, WORLDNETDAILY (Mar. 6, 2015), <http://www.wnd.com/2015/03/116-ex-gitmo-detainees-re-engaged-in-terrorism/>.

112. *About the UN*, UNITED NATIONS, <https://www.un.org/en/aboutun/index.shtml> (last visited Mar. 30, 2014).

113. *United Nations Action to Counter Terrorism*, UNITED NATIONS, <http://www.un.org/en/terrorism> (last visited Mar. 30, 2014) [hereinafter *United Nations Action to Counter Terrorism*].

incorporate gender perspectives in all of their peace and security efforts.¹¹⁴ These two efforts will be examined, both separately and in conjunction with one another. Next, this section will discuss how the two can best operate together, as well as the efforts the United Nations should be making to better incorporate gender issues in its counterterrorism efforts.

A. The United Nations' Global Counterterrorism Strategy

In September 2006, for the first time, all of the member-states of the United Nations agreed upon a Global Counterterrorism Strategy,¹¹⁵ providing a basic framework for fighting terrorism.¹¹⁶ The Secretary-General of the United Nations had proposed many of its elements in his May 2006 report, and the member-states agreed to the implementation of his plan.¹¹⁷ The Global Counterterrorism Strategy begins with a Plan of Action, where the member-states agree to strongly condemn terrorism, take action to combat terrorism, and ensure that all actions combatting terrorism comply with international law, including the United Nations Charter.¹¹⁸ First, the plan resolves to eliminate conditions that aid the spread of terrorism, “including but not limited to prolonged unresolved conflicts, dehumanization of victims of terrorism in all its forms and manifestations, lack of rule of law and violations of human rights, ethnic, national and religious discrimination, political exclusion, socio-economic marginalization, and lack of good governance....”¹¹⁹ They claim that this will be accomplished through numerous measures, such as promoting tolerance of different ethnicities, nationalities, religions, and cultures and enforcing inclusion and development for youth.¹²⁰

The second section deals with measures to fight terrorism; it lists eighteen different ways that the member-states hope to accomplish this.¹²¹ In general terms, a number of these measures simply involve strengthening existing counter-terrorist practices, from border protection to prosecution of perpetrators to carefully managing asylum grants.¹²² A few other measures consider creating other bodies, such as an international center to fight terrorism, which have not yet come to fruition.¹²³ Additionally, several measures indicate a commitment to larger efforts that the United Nations will implement; one example of this is that the United

114. *Landmark Resolution on Women, Peace, and Security*, OFF. OF THE SPEC. ADVISOR ON GEND. ISSUES AND ADVANCEMENT OF WOMEN, <http://www.un.org/womenwatch/osagi/wps/> (last visited Apr. 1, 2014).

115. G.A. Res. 60/288, U.N. Doc. A/RES/60/288 (Sept. 20, 2006).

116. *United Nations Action to Counter Terrorism*, *supra* note 113.

117. *United Nations General Assembly Adopts Global Counter-Terrorism Strategy*, UNITED NATIONS, <http://www.un.org/en/terrorism/strategy-counter-terrorism.shtml#plan> (last visited Apr. 1, 2014) [hereinafter *UN Global Counter-Terrorism Strategy*].

118. *Id.* Other forms of international law that the member-states must comply with include international conventions and protocols, especially those applying to human rights. *Id.*

119. *Id.*

120. *Id.*

121. *Id.*

122. *Id.*

123. Chumley, *supra* note 111.

Nations Counter-Terrorism Committee will work to increase the effectiveness of travel bans against known Middle Eastern terrorist groups.¹²⁴

The third section discusses strengthening various aspects of the United Nations' counter-terrorism work and encouraging other organizations¹²⁵ to cooperate more with the United Nations and its efforts in the future.¹²⁶ Finally, the fourth section reaffirms the countries' commitment to protecting and promoting human rights.¹²⁷

B. The United Nations' Efforts Regarding Women, Security, and Peace

In October 2000, the Security Council adopted a resolution on women, peace, and security.¹²⁸ The resolution was created to demonstrate the importance of women in efforts for peace, increase awareness of gender perspectives in United Nations peace and security efforts, and work to protect women and girls from violence based upon their gender.¹²⁹ The resolution sought to increase representation of women in decision-making roles in organizations at both the national and international levels, including increasing their representation in military and law enforcement fields.¹³⁰ The resolution also "expresses [a] willingness to incorporate a gender perspective into peacekeeping operations" and to adopt this gender perspective in conflict resolution.¹³¹ It discusses human rights efforts and the need to protect women from violence, as well as conducting studies on how violence and conflict affect women and girls.¹³² Finally, the Security Council vows to keep apprised of issues related to women, security, and peace.¹³³ Nowhere does the document expressly mention terrorism (although it does specifically mention other crises that women may be involved in such as genocide).¹³⁴

Since the adoption of this resolution almost fourteen years ago, the United Nations has continued to make efforts to include women and increase gender equality, including the creation of UN Women in 2010.¹³⁵ UN Women is an

124. *UN Global Counter-Terrorism Strategy*, *supra* note 117.

125. *UN Global Counter-Terrorism Strategy*, *supra* note 117. These organizations include the International Monetary Fund; the World Bank; the International Criminal Police Organization; the International Atomic Energy Agency; the Organization for the Prohibition of Chemical Weapons; the World Health Organization; the International Maritime Organization; the World Customs Organization; and the International Civil Aviation Organization.

126. *UN Global Counter-Terrorism Strategy*, *supra* note 117.

127. *UN Global Counter-Terrorism Strategy*, *supra* note 117.

128. S.C. Res. 1325, U.N. Doc. S/RES/1325 (Oct. 31, 2000).

129. *UN Global Counter-Terrorism Strategy*, *supra* note 117..

130. S.C. Res. 1325, U.N. Doc. S/RES/1325 (Oct. 31, 2000).

131. S.C. Res. 1325, U.N. Doc. S/RES/1325 (Oct. 31, 2000).

132. S.C. Res. 1325, U.N. Doc. S/RES/1325 (Oct. 31, 2000).

133. S.C. Res. 1325, U.N. Doc. S/RES/1325 (Oct. 31, 2000).

134. S.C. Res. 1325, U.N. Doc. S/RES/1325 (Oct. 31, 2000).

135. *About UN Women*, UN WOMEN, <http://www.unwomen.org/en/about-us/about-un-women> (last visited Apr. 1, 2014). UN Women has made great efforts to strengthen the support for women's rights as human rights, including their campaign HeForShe, which enlists the support of men as advocates for gender equality. *See generally He For She*, <http://www.heforshe.org/> (last visited May 29, 2015).

organization that works to eliminate discrimination against girls and women, as well as work for their empowerment and equality.¹³⁶ The organization also works to implement some of the measures regarding peace and security that Resolution 1325 discussed.¹³⁷ Following Resolution 1325, there have been six additional UN Security Council resolutions reaffirming UN commitment to the implementation of Resolution 1325.¹³⁸

C. What the United Nations is Doing Right (and What it's Doing Wrong)

The Global Counterterrorism Strategy that the United Nations implemented in 2006 has made promising steps in the right direction. Eliminating the types of situations that can foster terrorism could have a positive impact on restricting the growth of female terrorists. Several of the situations that the United Nations sets out to prevent, such as political exclusion and lack of good governance, can negatively impact women, prompting them to join terrorist organizations in attempts to better their situations or the situations of their loved ones (e.g. husbands, siblings, and children). By fixing these kinds of situations, women may feel less desperate and believe they have more options.

It is important to also consider the women who do not become terrorists by choice. Where there are corrupt governments, socio-economic marginalization, and long-standing conflicts, there are more opportunities for women to be forced into becoming terrorists. Working to eliminate conditions that aid the spread of terrorism could have some very positive implications for both counterterrorism efforts and keeping women free of heavy terrorist influences.

Additionally, the Global Counterterrorism Strategy discusses the importance of preserving human rights on numerous occasions, which is important in regards to both men and women, but especially in regards to women. As long as women's human rights are disregarded during interrogation and detention, terrorist organizations will continue to grow and flourish out of anger and retaliation. As the United Nations makes efforts to combat this kind of inhumane treatment, it is making steps in the right direction. However, one must question the efficacy of these measures. While the United Nations may condemn human rights violations, that does not necessarily translate into practice by member states, as was discussed above.¹³⁹ Many turn a blind eye to the mistreatment of terrorists, considering them unworthy of these protections. If the resolutions that the members of the United Nations sign are not followed, then it is as if they were never signed at all. It is one thing to make a public commitment, and it is another to follow through with it.

There are several other areas where the United Nations could improve upon the Global Counterterrorism Strategy. Its second section, which discusses ways to

136. *Id.*

137. *What We Do: Peace and Security*, UN WOMEN, <http://www.unwomen.org/en/what-we-do/peace-and-security> (last visited Apr. 1, 2014).

138. See S.C. Res. 1820, U.N. Doc. S/RES/1820 (Jun. 19, 2008); S.C. Res. 1888, U.N. Doc. S/RES/1888 (Sept. 30, 2009); S.C. Res. 1889, U.N. Doc. S/RES/1889 (Oct. 5, 2009); S.C. Res. 1960, U.N. Doc. S/RES/1960 (Dec. 16, 2010); S.C. Res. 2106, U.N. Doc. S/RES/2106 (Jun. 24, 2013); S.C. Res. 2122, U.N. Doc. S/RES/2122 (Oct. 18, 2013).

139. A DECADE LOST, *supra* note 94, at 81.

counter terrorism, merely addresses strengthening existing state practices.¹⁴⁰ It does not discuss ways to better these existing practices. Some ways that they could be improved upon would be to prohibit searching for stereotypes or change the way that states train their law enforcement regarding terrorists.

Next, they suggest the creation of new bodies like the international center to fight terrorism.¹⁴¹ The measure instructs that the member-states “consider” this new body;¹⁴² this language is not strong enough to force state action. When these bodies are either not created or do not exercise significant power, it is a failure on the part of both the states and the resolution that sought to create them. Finally, by specifically mentioning actions to be taken against the Taliban and al Qaeda,¹⁴³ the United Nations and its Strategy is reinforcing certain stereotypes. Primarily, it is enforcing the stereotype that all terrorists are Middle Eastern, but additionally it promotes the idea that terrorists are primarily men. The United Nations should strive to dispel these myths about terrorists in order to more effectively combat terrorism.

In regards to the United Nations’ efforts concerning women, they are commendable. Attempting to increase women’s leadership roles in the member-states as well as in the United Nations will help in the search for terrorists for two reasons. When women are the ones looking for terrorists and making decisions, they will be more likely to look for other women and acknowledge the rising number of female terrorists. Second, when more women are involved in positions with law enforcement and the military, they are less likely to abuse the human rights of the women that they interrogate and detain. These are positive steps that the United Nations is trying to implement. Additionally, it is a positive sign that the United Nations is making efforts to increase gender perspective into peacekeeping operations, which would include efforts to prevent acts of terrorism.¹⁴⁴ By increasing gender perspective, stereotypes and myths about the gender of terrorists and the kind of work that each gender would do will be dispelled.

Despite the steps that the United Nations has taken, it could certainly take additional steps to better address the issue of growing female involvement in terrorism. In regards to increasing gender perspective, Resolution 1325 merely states that the member-states “express... a willingness to incorporate” it.¹⁴⁵ This is not a strong enough stance, and the United Nations must be more explicit in the future if it wants these measures to be obeyed by its member-states. Additionally, it would be beneficial if Resolution 1325, or the six reaffirming resolutions that followed it, mentioned the serious international problem of terrorism and how it both includes and impacts women.

By working to protect women’s human rights and improve their roles around the world, the United Nations is inherently helping some women out of the

140. *United Nations Action to Counter Terrorism*, *supra* note 113.

141. *United Nations Action to Counter Terrorism*, *supra* note 113.

142. *United Nations Action to Counter Terrorism*, *supra* note 113.

143. See In Brief: *Peace and Security*, UN WOMEN, available at <http://www.unwomen.org/~media/headquarters/attachments/sections/library/publications/2013/12/un%20women%20briefthematicpsuswebrev3%20pdf.ashx>.

144. S.C. Res. 1325, U.N. Doc. S/RES/1325 (Oct. 31, 2000).

145. S.C. Res. 1325, U.N. Doc. S/RES/1325 (Oct. 31, 2000).

situations that force them into terrorism, but that is not sufficient. There must be an active effort toward making a difference in the growing problem of women in terrorism in order to make a real difference. The efficacy of the United Nations' measures regarding women and security must also be scrutinized. If all member-states are not seeking to implement them, then the United Nations should be working to make its resolutions more effective worldwide. While both the Global Counterterrorism Strategy and Resolution 1325 were steps in the right direction for the international community, further steps need to be taken by the United Nations going forward.

IV. CONCLUSION

This Note has attempted to demonstrate the growth of female terrorists in the modern world and the impact of this growth globally. Section One examined how women are becoming involved in terrorist organizations in North and South America, Asia, Europe, and Africa, as well as the roles that they fulfill in different organizations and regions. Section One also discussed why women are increasingly choosing to join or aid terrorist organizations and why said organizations are more interested in female recruits now than ever.

After establishing the motivations of terrorist groups and their female members, this Note looked at how this knowledge can be used to combat terrorism. American legislation and law enforcement practices leave a great deal to be desired in countering woman terrorists, and possible solutions to this problem were discussed in Section Two. International law was then examined, through the United Nations' General Assembly and Security Council resolutions; these resolutions have both positive and negative aspects. The Note then went on to discuss some ways in which international law and the United Nations could better achieve their aim of combating terrorism, particularly in regards to fighting the powerful weapon that is female terrorists. Overall, it was shown that some progress has been made regarding the growing number of female terrorists, but as more research is done, it only illustrates that more efforts need to be taken to improve efficiency.

Finally, it is important to look to the future of terrorism. Terrorist groups will continue to grow and adapt in order to continue to thwart counterterrorist efforts, and the international community can expect to see a continuing use of women for as long as they continue to be a useful tool. However, as they will inevitably be more effectively combated, perhaps by using some of the above techniques and ideas, terrorist leadership will be looking for new tools. It is likely that terrorist organizations will find their next secret weapon in children.¹⁴⁶ Little research has been conducted on the use of children by terrorist groups, and unfortunately the

146. *Death Becomes Her*, *supra* note 5, at 140. Use of children as terrorists has sadly already begun. The Taliban have been known to try to recruit boys as young as six years old, and terrorist groups in Iraq have recruited girls as young as fourteen years old. *See also* Mia Bloom & John Horgan, *New Terror Weapon: Little Girls?*, CNN OPINION (Jan. 7, 2014, 3:23 PM), <http://www.cnn.com/2014/01/07/opinion/bloom-horgan-afghanistan-girl/>; Jagriti Kumari, *Islamic State Exploits Children for its Terror*, NITI CENTRAL (Mar. 11, 2015), <http://www.niticentral.com/stream>; Jenny Stanton, *French Child Becomes the Youngest ISIS Member to be 'Killed in Action'*, DAILY MAIL (Mar. 10, 2015, 6:19 AM), <http://www.dailymail.co.uk/news/article-2987705/French-child-youngest-ISIS-member-killed-action-Boy-13-posed-M-16-assault-rifle-killed-Syria.html>.

practice has grown in recent years. This is something to look out for in the future, as those looking to combat terrorist acts rarely expect or look for children, especially young women, and the main goal of counterterrorist efforts is to stay one step ahead of terrorism.