
SAUDI COURTS — WOMEN’S RIGHTS — GENERAL COURT OF QATIF SENTENCES GANG-RAPE VICTIM TO PRISON AND LASHINGS FOR VIOLATING “ILLEGAL MINGLING” LAW.

Last December, while the National Organization for Women (NOW) celebrated the success of its campaign for “non-sexist car insurance,”¹ a young woman already brutalized by her neighbors awaited further violence from her state. The previous month, Saudi Arabia’s General Court of Qatif had sentenced her to six months in prison and two hundred lashes for riding in a car with an unrelated male acquaintance, after which she was gang-raped by seven men.² Her subsequent pardon by King Abdullah³ indicates the power of international outrage and pressure, but the lack of energy with which Western women’s rights groups participated in that outrage and pressure is indicative of a larger and troubling trend. Feminist groups too often do not help women abroad, but they can help, and they should help, because the need for their support is far greater overseas than at home.⁴ Although the reasons for their choice to prioritize sometimes relatively trivial matters in America over life-threatening issues facing women across the ocean may not be known, its effect is all too apparent: less pressure on foreign governments to end the suffering of millions of subjugated Islamic women.

With a legal system based on a strict interpretation of Islam,⁵ Saudi Arabia is a state of gender apartheid. For women permitted to work — they comprise 5.4% of the workforce⁶ — office buildings are segregated.⁷ For women taught to read — the illiteracy rate for women is

¹ Nat’l Org. for Women, Vote for Non-Sexist Car Insurance (Dec. 7, 2007), <http://www.now.org/issues/economic/insurance/metermileupdate.html>.

² See Rasheed Abou-Alsamh, *Ruling Jolts Even Saudis: 200 Lashes for Rape Victim*, N.Y. TIMES, Nov. 16, 2007, at A3. The Qatif woman was not sentenced for being raped but rather for meeting with the male acquaintance, a former boyfriend. *Id.* This comment relies on media reports rather than court documents because the Saudi judges did not provide a written opinion. Cf. *Saudi Arabia: Rape Victim Punished for Speaking Out*, HUMAN RIGHTS WATCH, Nov. 17, 2007, <http://hrw.org/english/docs/2007/11/16/saudia17363.htm> (noting that “[o]ften, judges do not provide written verdicts”).

³ *King Pardons Saudi Rape Victim*, CNN, Dec. 19, 2007, <http://www.cnn.com/2007/WORLD/meast/12/17/saudi.rape/index.html>.

⁴ For discussions of the relationship between feminist organizations and the rights of Islamic women, see generally Christina Hoff Sommers, *The Subjection of Islamic Women: And the Fecklessness of American Feminism*, WKLY. STANDARD, May 21, 2007, at 14; and Anne Applebaum, *The Wahhabi Woman Problem*, SLATE, Dec. 17, 2007, <http://www.slate.com/id/2180169/>.

⁵ See Faiza Saleh Ambah, *Saudi Lawyer Takes on Religious Court System*, WASH. POST, Dec. 23, 2006, at A1.

⁶ Jim Landers, *Sentence for Rape Victim Seen as Step Back for Saudi Women*, DALLAS MORNING NEWS, Nov. 23, 2007, at 1A.

⁷ See Max Boot & Lee Wolosky, *What To Do in Riyadh: You’re Only Two Hours from the Emirates — Get on a Plane*, WKLY. STANDARD, Dec. 10, 2007, at 26, 29.

almost twice that for men⁸ — libraries are segregated.⁹ For women allowed to leave their homes alone — a woman's travel must be authorized by a man — they reach their destinations by foot or hired driver, because they are prohibited from driving cars.¹⁰ It is a crime for a woman to meet with a man to whom she is not related.¹¹

In 2006, a nineteen-year-old, recently married woman from Qatif¹² agreed to meet with a former acquaintance in order to retrieve a modest photograph with which he was allegedly blackmailing her.¹³ Two men commandeered their car, drove them to an isolated area, and sexually assaulted them at knifepoint.¹⁴ After the second man attacked her, she “spent two hours begging” to be taken home.¹⁵ Instead, five more men violated her.¹⁶ “The fifth and sixth ones were the most abusive. After the seventh one,” the victim recounted, “I couldn't feel my body anymore.”¹⁷ All seven then raped her again.¹⁸

Nowhere is rape an easy charge to make.¹⁹ It is especially difficult in a nation like Saudi Arabia. Among the obstacles the Qatif woman faced in bringing her case was her brother, who attempted to murder her.²⁰ Nevertheless, she brought her attackers²¹ to the General Court of Qatif, which in October 2006 found the men guilty only of kidnapping, rather than rape,²² and sentenced them to between ten months and five years in prison.²³ The judges also interrogated the rape vic-

⁸ See U.S. DEP'T OF STATE, BUREAU OF NEAR EASTERN AFFAIRS, BACKGROUND NOTE: SAUDI ARABIA (2008), <http://www.state.gov/r/pa/ei/bgn/3584.htm> (reporting male literacy rate of 84.7% and female literacy rate of 70.8%).

⁹ Boot & Wolosky, *supra* note 7, at 29.

¹⁰ *Saudi: Why We Punished Rape Victim*, CNN, Nov. 20, 2007, <http://edition.cnn.com/2007/WORLD/meast/11/20/saudi.rape.victim/index.html>.

¹¹ *Id.*

¹² Nadia Abou El-Magd, *Saudi Rape Ruling Puts Govt on Defensive*, WASHINGTON-POST.COM, Dec. 1, 2007, http://www.washingtonpost.com/wp-dyn/content/article/2007/12/01/AR2007120101200_pf.html. The victim's name has not been released.

¹³ See *Saudi: Why We Punished Rape Victim*, *supra* note 10.

¹⁴ See Lara Setrakian, *Exclusive: Saudi Rape Victim Tells Her Story*, ABC NEWS, Nov. 21, 2007, <http://abcnews.go.com/print?id=3899920>. The male acquaintance was also raped. See *Saudi Arabia: Rape Victim Punished for Speaking Out*, *supra* note 2.

¹⁵ Setrakian, *supra* note 14.

¹⁶ See *id.*

¹⁷ *Id.* (internal quotation mark omitted).

¹⁸ *Id.*

¹⁹ Cf. SUSAN ESTRICH, REAL RAPE (1987) (discussing the difficulties in prosecuting “simple rape,” i.e., non-stranger rape).

²⁰ See Setrakian, *supra* note 14. Her husband supported her. *Id.*

²¹ *Id.*

²² *Saudi Arabia: Rape Victim Punished for Speaking Out*, *supra* note 2.

²³ Faiza Saleh Ambah, *Rights Advocate Fights Back*, WASH. POST, Nov. 29, 2007, at A18. Media accounts differ on the rapists' sentences. Compare *id.* (reporting no mention of lashes for rapists and between ten months and five years in prison), with *Saudi Arabia: Rape Victim Punished for Speaking Out*, *supra* note 2 (reporting 80 and 1000 lashes and between one and five years in prison for four of the rapists).

tim, yelled at her, insulted her, and insinuated that she was having an affair with the male acquaintance, before sentencing her to ninety lashes for “illegal mingling” — meeting with an unrelated member of the opposite sex.²⁴ Authorities administer such sentences in sets of about fifty lashes, typically “spread over several days.”²⁵

After review by the Supreme Council of the Judiciary, the General Court of Qatif added six months in prison to the woman’s sentence and increased her corporal punishment to two hundred lashes.²⁶ According to the General Court, the victim’s “attempt to aggravate and influence the judiciary through the media” merited the additional punishment.²⁷ The Saudi Ministry of Justice soon provided the media with additional justifications for the increased sentence, including a claim that the “main reason” for the assault was the woman’s illegal mingling, which “caused [the rape] because [she and her acquaintance] violated the provisions of Islamic Law.”²⁸

Several Middle Eastern and Western human rights groups condemned the Saudi court,²⁹ and the Bush Administration voiced some criticism as well, with Administration officials calling it “outrageous”³⁰ and “absolutely reprehensible.”³¹ The President personally added that if one of his daughters were in a similar situation, he would be “angry at those who committed the crime” and “angry at a state that didn’t support the victim.”³² Less than a month after this surge in attention and criticism, at a time when the Saudi government was arranging several “major international business deals” and vying to be a power broker in Middle East peace negotiations,³³ King Abdullah pardoned

²⁴ See *Saudi Arabia: Rape Victim Punished for Speaking Out*, *supra* note 2 (internal quotation marks omitted).

²⁵ *Rape Case Calls Saudi Legal System into Question*, MSNBC, Nov. 21, 2006, <http://www.msnbc.msn.com/id/15836746/>.

²⁶ See *Saudi Arabia: Rape Victim Punished for Speaking Out*, *supra* note 2. The court also increased the rapists’ sentences. See *Saudi: Why We Punished Rape Victim*, *supra* note 10.

²⁷ *Saudi Arabia: Rape Victim Punished for Speaking Out*, *supra* note 2 (internal quotation mark omitted).

²⁸ *New Explanatory Statement by the Ministry of Justice on Qatif Girl*, SAUDI PRESS AGENCY, Nov. 24, 2007, <http://www.spa.gov.sa/English/details.php?id=502890>.

²⁹ See, e.g., *Saudi Arabia: Rape Victim Punished for Speaking Out*, *supra* note 2 (Human Rights Watch speaks out against punishment of Qatif woman); *Saudi: Why We Punished Rape Victim*, *supra* note 10 (“This is not just about the Qatif girl, it’s about every woman in Saudi Arabia,” said Fawzeyah al-Oyouni, founding member of the newly formed Saudi Association for the Defense of Women’s Rights.”).

³⁰ See Stephen Schwartz & Irfan Al-Alawi, *The Crime of Qatif: Saudi Justice: Whipping a Rape Victim*, DAILY STANDARD, Nov. 28, 2007 (internal quotation mark omitted), <http://www.weeklystandard.com/Content/Public/Articles/000/000/014/411hiynm.asp>.

³¹ See *Saudi: Why We Punished Rape Victim*, *supra* note 10 (internal quotation marks omitted).

³² President George W. Bush, Press Conference by the President (Dec. 4, 2007) (transcript available at <http://www.whitehouse.gov/news/releases/2007/12/20071204-4.html>).

³³ Jeffrey Fleishman, *Saudi Rape Sentence Ignites Anger*, L.A. TIMES, Dec. 16, 2007, at A10.

the woman from Qatif, a decision widely viewed as a response to the international outcry and global pressure.³⁴

Several leading feminist groups in America did not join the international condemnation of the Qatif woman's punishment. These groups' records are troubling, especially in light of the Qatif woman's pardon, which shows how effective Western pressure on governments like Saudi Arabia's can be. In failing to give voice to millions of women too often voiceless, feminist groups are squandering an opportunity to address arguably "the most pressing women's issue of our age."³⁵ These organizations have the potential to influence America's government, which can then influence allied Islamic governments. They can help more, and they should.

To be sure, women's groups differ, and there are exceptions — such as Equality Now³⁶ — to the general trend. However, this comment focuses not on the exceptions, but on the standard bearers and leaders of the women's rights movement in America — in particular, three feminist groups whose recent histories include some very public campaigns for women's rights. The first is NOW, "the largest, most comprehensive feminist advocacy group in the United States."³⁷ Regarding the Qatif woman, NOW neither drew attention to her case nor publicly supported her before the pardon.³⁸ The National Council of Women's Organizations (NCWO) was similarly quiet.³⁹ NCWO is "the only national coalition of its kind," representing 10 million women as an umbrella group for 200 organizations⁴⁰ that famously challenged, among other issues, the gender policies of Augusta National Golf Club.⁴¹ The third group, Feminist Majority Foundation (FMF), advocates for feminist causes and publishes *Ms. Magazine*, which is "an award-winning magazine recognized nationally and internationally as the media expert on issues relating to women's status, women's rights,

³⁴ Isambard Wilkinson, *Saudi King Pardons Rape Victim*, DAILY TELEGRAPH, Dec. 18, 2007, at 16.

³⁵ Sommers, *supra* note 4, at 14.

³⁶ See Equality Now, <http://www.equalitynow.org/english/index.html> (last visited May 12, 2008).

³⁷ Nat'l Org. for Women, About NOW: We Want It All, <http://www.now.org/about.html> (last visited May 12, 2008).

³⁸ NOW's president mentioned the Qatif case on January 4, 2008 — about one month after King Abdullah pardoned the Qatif woman. See Kim Gandy, *Below the Belt — A Maddening Reminder*, NAT'L ORG. FOR WOMEN, Jan. 4, 2008, <http://www.now.org/news/note/010408.html>.

³⁹ NCWO appears to have made no public statements about the Qatif case. As of May 12, 2008, a LexisNexis search for "National Council of Women's Organizations" and "Qatif" results in no hits. All LexisNexis searches cited in this comment are of "News, All (English, Full Text)."

⁴⁰ Nat'l Council of Women's Orgs., Our History, http://www.womensorganizations.org/index.php?option=com_content&task=view&id=17&Itemid=46 (last visited May 12, 2008).

⁴¹ See Bill Pennington, *She Did Not Prevail This Year, but Burk Has Time on Her Side*, N.Y. TIMES, Apr. 14, 2003, at D1.

and women's points of view."⁴² FMF's leadership made no public statements criticizing the Saudi ruling.⁴³ A feature within the website for *Ms. Magazine* summarized several objectively written wire service stories covering the Qatif case,⁴⁴ thus making FMF's record more impressive than NOW and NCWO's, although still far short of the kind of public crusade such groups have waged in the past.

The hushed response from feminists following the sentencing of the Qatif woman is not new. According to a diverse collection of scholars and feminist activists, women's groups devote little attention and few resources to the cause of millions of Muslim women whose citizenship remains second-class and whose lonely struggles against a system of apartheid and oppression appear to be a low priority for most women's rights organizations. It is against that system of gender apartheid — not merely individual instances of persecution — that women's groups should wage a full-fledged campaign of opposition.

We know what such an effort would look like. We have seen full-fledged campaigns in the past. For example, in 2002, NCWO launched a high profile, uncompromising ten-month campaign against Augusta National Golf Club's exclusion of women, which included letter writing, speeches, pressure on corporations sponsoring the Masters Tournament, exposure of corporate officials connected to the golf club, and, most importantly, lobbying of journalists and editorialists.⁴⁵ The group "filled the air waves and print media in 2002–2003."⁴⁶ Books were written about the crusade.⁴⁷ The *New York Times* published nearly one hundred articles in ten months mentioning NCWO's president and Augusta National.⁴⁸ Over three thousand media reports discussed the organization and the golf course.⁴⁹ The campaign's effect

⁴² HerStory: 1971 — Present, *Ms. Magazine*, <http://www.msmagazine.com/about.asp> (last visited May 12, 2008).

⁴³ A LexisNexis search of "Feminist Majority" and "Qatif" performed on May 12, 2008, resulted in no hits, indicating that the action they took in response to the Qatif case was not high profile enough to generate widespread media attention. One could compare its actions to NCWO's actions regarding Augusta National. A LexisNexis search of "National Council of Women's Organizations" and "Augusta" performed on the same day resulted in over 3000 hits.

⁴⁴ See, e.g., *Rape Victim Sentenced to 200 Lashings*, *MS. MAGAZINE*, <http://www.msmagazine.com/news/uswirestory.asp?id=10670>.

⁴⁵ Peter J. Boyer, *Club Rules: The Antagonists in the Augusta Controversy Are More Complicated than You'd Think*, *NEW YORKER*, Feb. 17 & 24, 2003, at 78, 81; see also Press Release, The Augusta National Golf Club Story: 2005, Nat'l Council of Women's Orgs. (Apr. 7, 2005), <http://www.ncwo-online.org/pages.cfm?ID=210>.

⁴⁶ The Augusta National Golf Club Story: 2003, Nat'l Council of Women's Orgs., <http://www.ncwo-online.org/pages.cfm?ID=92>.

⁴⁷ See, e.g., ALAN SHIPNUCK, *THE BATTLE FOR AUGUSTA NATIONAL* (2004).

⁴⁸ A LexisNexis search of "Martha Burk" and "Augusta" results in 98 hits between September 1, 2002, and July 1, 2003, when limited to articles in the *New York Times*.

⁴⁹ As of May 12, 2008, a LexisNexis search of "National Council of Women's Organizations" and "Augusta" results in over 3000 hits.

was dramatic. After a White House press conference began with three questions about the man nominated to be Treasury Secretary and his recent resignation from membership at Augusta National, NCWO's president stated, "I've already won. Even if Augusta National never admits a woman, people will never again look at it without thinking, Discrimination. If I got off the stage today, the club is already tainted, the tournament is tarnished, and that will remain."⁵⁰

The unwillingness of many leading Western feminist groups to wage with similar energy a campaign for Muslim women who live under gender apartheid — an Augusta-like campaign that "fill[s] the airwaves and print media" and exerts pressure on those connected to its "tainted" target — has not escaped the notice of several concerned feminists.⁵¹ Last year, Tammy Bruce, past president of the Los Angeles chapter of NOW, criticized the organization for not "taking an official position" after a female schoolteacher in Sudan was imprisoned⁵² and threatened by mobs for allowing students to name a Teddy bear "Muhammad,"⁵³ adding that "[w]e have a duty to make a difference for women around the world."⁵⁴ Professor Martha Nussbaum has observed that "feminist theory pays relatively little attention to the struggles of women outside the United States."⁵⁵ Pulitzer Prize-winning author Anne Applebaum criticized feminist groups' lack of reaction to the Qatif case, writing that "we have (fortunately) fought for less fundamental rights in recent decades, and our women's groups have of late (unfortunately) had the luxury of focusing on the marginal."⁵⁶

A closer examination of this mention of "the marginal" reveals the primary reason why feminist groups should make a larger commitment to gender equality in the Muslim world: there is more at stake for

⁵⁰ Boyer, *supra* note 45, at 79 (internal quotation mark omitted).

⁵¹ FMF and NCWO have joined over forty other organizations in an Internet campaign that "invites people to add their names to a virtual book on a web site" to show opposition to international gender violence. See News Release, UNIFEM and Goodwill Ambassador Nicole Kidman Launch Internet Campaign on Ending Violence Against Women, UNIFEM (Nov. 26, 2007), http://www.unifem.org/news_events/story_detail.php?StoryID=644. This is distinguishable both from a high energy campaign like that against Augusta National and from a campaign that specifically criticizes the systematic oppression of Muslim women in societies of gender apartheid such as Saudi Arabia.

⁵² *Sudan Charges British Teacher with Insulting Religion with "Muhammad" Teddy Bear*, FOXNEWS.COM, Nov. 28, 2007, <http://www.foxnews.com/story/o,2933,313426,oo.html> (quoting Bruce).

⁵³ See Jeff Jacoby, Op-Ed, *The Islamist War on Muslim Women*, BOSTON GLOBE, Dec. 23, 2007, at E9 (Before her pardon, "Gibbons had been sentenced to prison, but government-organized street demonstrators were loudly demanding her execution.")

⁵⁴ *Sudan Charges British Teacher with Insulting Religion with "Muhammad" Teddy Bear*, *supra* note 52 (internal quotation marks omitted).

⁵⁵ Martha C. Nussbaum, *The Professor of Parody: The Hip, Defeatist Feminism of Judith Butler*, NEW REPUBLIC, Feb. 22, 1999, at 37, 38.

⁵⁶ Applebaum, *supra* note 4.

women in societies of gender apartheid than in the places where women's groups are currently committing many of their resources. For example, the same month that human rights groups and administration officials came to the defense of the woman from Qatif, NOW President Kim Gandy took aim in her biweekly column at a "world" in which "girls and boys are given separate dreams to follow."⁵⁷ Her topic was "the world of toys."⁵⁸ Outraged at the segregation in places like Toys "R" Us of dolls and trucks, toy jewelry and toy cars, pink and blue baby clothes, Gandy asked rhetorically, "What year is this again?"⁵⁹ One can only guess how many more rights some Islamic women would enjoy if Gandy and organizations like hers made a habit of expressing a similar outrage for a different kind of segregation — not of pink and blue toys, but of male and female Muslims.

Feminist groups might counter that foreign problems are no business of Americans, who should only emphasize domestic concerns; however, such isolationism is inconsistent with both modern feminism and feminist history. Although contemporary women's groups are generally not enthusiastic advocates in opposition to the oppression of millions of Muslim women, they champion a collection of other international causes. For example, NOW unequivocally demands that "girls and women all over the world deserve comprehensive reproductive health care and services," and visitors to NOW's website can send a pre-written letter to members of Congress in support of "family planning programs for women and families around the world."⁶⁰ Feminism's earliest history provides the foundation for international advocacy: At the Seneca Falls Convention in 1848, Elizabeth Cady Stanton's *Declaration of Sentiments and Resolutions* relied on fundamental principles that stretched "over all the globe"⁶¹ and indicated concern for women nationally and internationally. It "submitted to a candid world" the belief "that all men and women are created equal."⁶²

Western women's organizations might argue that they cannot be effective advocates "over all the globe." Again, however, history suggests otherwise. For example, civil rights groups like the NAACP led massive protests against apartheid in South Africa in the 1980s.⁶³ The

⁵⁷ Kim Gandy, *Below the Belt — NOW's Naughty List: Stereotyping Toys*, NAT'L ORG. FOR WOMEN, Dec. 21, 2007, <http://www.now.org/news/note/122107.html>.

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ Nat'l Org. for Women, Repeal the Global Gag Rule, <http://www.capwiz.com/now/issues/alert/?alertid=10050776&type=CO> (last visited May 12, 2008).

⁶¹ Declaration of Sentiments and Resolutions, Seneca Falls Convention (1848), *reprinted in A PATRIOT'S HANDBOOK* 289, 291 (Caroline Kennedy ed., 2003).

⁶² *Id.* at 289 (emphases added).

⁶³ See NAACP, Timeline, <http://www.naacp.org/about/history/timeline/> (last visited May 12, 2008) ("NAACP le[d] a massive anti-apartheid rally in New York.").

U.S. government then enacted sanctions that “play[ed] havoc with [South Africa’s] economy” and contributed to apartheid’s demise.⁶⁴ The Qatif woman’s pardoning also demonstrates that Western governments, which are influenced by special interest groups like NOW, FMF, and NCWO, have the power to influence Saudi treatment of women. When they fail to advocate for victims like the Qatif woman, they lose a chance to support women where women are most in need.

What explains why women’s groups are too quiet regarding the plight of women in many Muslim countries? Women’s rights activist and Professor Phyllis Chesler suggests that women’s groups view criticism of other cultures as “either ‘imperialist’ or ‘crusade-ist.’”⁶⁵ She calls such cultural relativism “perhaps the greatest failing of the feminist establishment.”⁶⁶ Tammy Bruce also argues that “[t]he supposed feminist establishment . . . ha[s] no sensibility of what is right anymore [because its leaders are] afraid of offending people.”⁶⁷ This cultural relativism — what Christina Hoff Sommers calls a general unwillingness “to pass judgment on non-Western cultures”⁶⁸ — is inconsistent with feminism’s declaration that all people deserve equality and that change is required where inequality exists.⁶⁹ If to understand all is to forgive all, then to forgive all is to change nothing.

Having been violated fourteen times by seven men, the woman from Qatif faced her rapists’ — but not her country’s — final assault on her dignity: their laughter.⁷⁰ At trial, they “laughed challengingly and looked at her with contempt: ‘As if nothing happened.’”⁷¹ No doubt they were laughing at a scared woman in a lonely place. But had their perspective been broader, had they known how quiet Western groups dedicated to their victim’s defense⁷² would be, the rapists could have been laughing at those women as well. And despite their victim’s reprieve from prison and lashing, they might still be laughing — at the countless Muslim wives and daughters trapped in actual and societal prisons, for whom no such deliverance has yet come.

⁶⁴ Paul Taylor, *Father of His Country*, WASH. POST MAG., Feb. 13, 1994, at 10, 17.

⁶⁵ PHYLLIS CHESLER, *THE DEATH OF FEMINISM* 2 (2005).

⁶⁶ *Id.* at 3.

⁶⁷ *Sudan Charges British Teacher with Insulting Religion with “Muhammad” Teddy Bear*, *supra* note 52 (internal quotation marks omitted).

⁶⁸ Sommers, *supra* note 4, at 14.

⁶⁹ See Declaration of Sentiments and Resolutions, Seneca Falls Convention, *supra* note 61.

⁷⁰ Farrag Ismail, *Saudi Rape Victim Sentenced to Jail and Flogging*, ALARABIYA.NET, Nov. 15, 2007 (Sonia Farid trans.), http://www.alarabiya.net/save_print.php?print=1&cont_id=41708&lang=en.

⁷¹ *Id.* (quoting the Qatif woman); see also Email from Ayesha Bhatti, Associate Editor, www.Alarabiya.net, to Editor, Harvard Law Review (Feb. 27, 2008, 10:35:00 EST) (on file with the Harvard Law School Library).

⁷² Violence against women is one of NOW’s six “Top Priority Issues.” See Nat’l Org. for Women, Key Issues, <http://www.now.org/issues/> (last visited May 12, 2008).