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Gender and Counterterrorism: How The United States' Underestimation of Women's Roles in Violent Extremism Threatens National Security

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GENDER AND COUNTERTERRORISM: HOW THE UNITED STATES' UNDERESTIMATION OF WOMEN'S ROLES IN VIOLENT EXTREMISM THREATENS NATIONAL SECURITY

Brianna N. Bulski*

Abstract

Discourse surrounding conflict and terrorism is often confined by gendered binaries which conflate masculinity with violence and femininity with peace and passivity. The social adoption of these archetypes has encouraged policy makers and security officials to paint men as combatants or orchestrators of extremism, while women are thought of as mere collaterals to war. However, the number of women involved in extremist groups is rising both domestically and abroad. As the essentialization of femininity becomes increasingly dangerous, the exigency to reimagine national security initiatives grows. This comment argues that the United States has reached a critical juncture in its counterterrorism policy and must avoid rigidity in favor of a more nuanced understanding of how gender influences the risk of radicalization. Recognizing that most research in this area focuses on how extremist groups leverage their influence to extort and subjugate women, this comment focuses on women's roles as both perpetrators and potential mitigators of violence.

Table of Contents

I. Introduction	55
II. Background	59
A. Early Female Terrorist Participation	59
B. The Modern Era of Female Involvement	61
III. Discussion	64
A. Feminine Stereotypes	64
B. The Rise in Female Recruitment	66
IV. Analysis and Recommendations	68
A. Current Approaches to Counterterrorism in the U.S.	68
B. Policy Recommendations	70
V. Conclusion	71

I. Introduction

In the fall of 2000, the United Nations Security Council (“UNSCR”) unanimously adopted Resolution 1325 (“UNSCR 1325”), declaring the role of women in conflict prevention, peace-building and subsequent post-conflict reconstruction

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to be critical.¹ Less than one year later, on September 11, 2001 (“9/11”), suicide attackers commandeered U.S. passenger jets, flying them into skyscrapers in lower Manhattan, killing thousands and igniting a war that has engulfed the ensuing decades of American foreign policy.² At the time of the attack, very little was known about the motivations of the hijackers.³ However, as the events unfurled, the surrounding discourse became rife with “hegemonic masculinity, militarism, and war.”⁴ On the evening of the attacks, then President George W. Bush, addressed the nation in no uncertain terms: “We will make no distinction between the terrorists who committed these acts and those who harbor them.”⁵ This statement became the foundation for what would later be known as The Bush Doctrine – a set of national security strategies promising preemptive wars on perceived enemies and unilateral actions by the United States ostensibly in defense of global democracy, both abroad and at home.⁶

The highly reactionary and, at times, draconian political rhetoric of this era found force in binaries – “Either you are with us, or you are with the terrorists.”⁷ These stark distinctions lent themselves to a series of typecasts, which the U.S. heavily relied upon as it tried to compose the profile of its enemy.⁸ In the context of 9/11, portraits of American heroism were predominantly male, highlighting political figures such as New York City Mayor Rudolph Giuliani and President Bush, as well as largely male professions such as firemen and police officers, who were lauded for their roles as first responders.⁹ Heroism therefore became

¹ Office of the Special Adviser on Gender Issues and Advancement of Women, *Landmark Resolution on Women, Peace and Security*, U.N., <https://www.un.org/womenwatch/osagi/wps/> (last visited Oct. 9, 2022); see generally S.C. Res. 1325 (Oct. 31, 2000).

² Patrick Jackson, *September 11 Attacks: What Happened on 9/11?*, BBC NEWS (Aug. 3, 2021), <https://www.bbc.com/news/world-us-canada-57698668>.

³ Interview by David Ignatius with Dr. Condoleezza Rice, Former U.S. Secretary of State, WASH. POST (Sept. 10, 2021) (explaining that the first plane was perceived to be an “accident,” and then when the second plane hit the World Trade Center, she believed it to be a terrorist attack. It wasn’t until the next day that George Tenet, the CIA Director at the time, formally attributed the attack to al-Qaeda), <https://www.washingtonpost.com/washington-post-live/2021/09/10/911-twenty-years-later-with-condoleezza-rice/>.

⁴ Jezzamine Faye Matias-Martinsen, *A Feminist Perspective in Countering Terrorism – Does it Really Matter?*, 12 ARRELANO L. & POL’Y REV. 39, 51 (2014).

⁵ Gary L. Gregg II, *George W. Bush: Foreign Affairs*, UNIV. VA. MILLER CTR., <https://millercenter.org/president/gwbush/foreign-affairs> (last visited Oct. 09, 2022).

⁶ *Id.* It should be noted that the Bush Doctrine was met with mixed reviews. Gregg explains that while neoconservatives were in strong support of the “idea of the United States acting on its own to ensure the country’s security and to protect the American people – preemptively, if necessary,” others found the policies to be extreme and its objectives of spreading democracy to be naïve.

⁷ President George W. Bush, Address to Joint Session of Congress and the American People (Sept. 20, 2001, 9:00 PM), <http://georgewbush-whitehouse.archives.gov/news/releases/2001/09/20010920-8.html>; see also Hilary Charlesworth & Christine Chinkin, *Editorial Comment: Sex, Gender, and September 11*, 96 AM. J. INT’L L. 600 (2002).

⁸ Jayne Huckerby, *Feminism and International Law in the Post 9/11 Era*, 39 FORDHAM INT’L L. J. 533, 542 (2016).

⁹ Charlesworth & Chinkin, *supra* note 7, at 600. Other notable players of this time include Secretary of State Colin Powell, Secretary of Defense Donald Rumsfeld, Attorney General John Ashcroft, Vice President Dick Cheney, and the head of the National Security Council, Condoleezza Rice. Rice was one of the few, if not the only, women intimately involved with the post-9/11 White House policy response.

synonymous with a sort of action-laden masculinity. The enemy, however, was also male.¹⁰ Not only were all nineteen of the 9/11 hijackers men, but the terrorist organizations backing their actions were also run entirely by men.¹¹ Women were thus noticeably absent from both the “us” and the “them” of the post-9/11 political dichotomies.

The “War on Terror” is not unique in this regard. Conflict, and by extension, terrorism has long been understood within a gendered binary.¹² Men leave to fight, while the women stay to maintain civil society. Through the masculinization of conflict, women have been effectively relegated to the fringes of the narrative.¹³ Women are instead understood as static, collaterals of war, or transitively, as naïve victims coerced into criminal operations.¹⁴ This means that while their male counterparts are regarded as deadly, disciplined fanatics, female fighters are often viewed as mere casualties to the cause.¹⁵ As such, women are neither perceived as serious threats, nor have they been the target of meaningful counterterrorism policy.

The twentieth anniversary of the 9/11 attacks and the recent withdrawal of American forces from Afghanistan invites the U.S. to reflect on the past costs, present status and future policies surrounding American counterterrorism both domestically and abroad. In the two decades following the invasion of Afghanistan, the United States has spent over eight trillion dollars on its foreign counterterrorism efforts.¹⁶ The price of war goes far beyond mere dollars, however, having been fought at the expense of over 7,000 slain U.S. soldiers, over 360,000 civilian lives, nearly 40 million displaced people, and countless more who have been left to cope with residual effects of conflict such as malnutrition,

¹⁰ This note uses terms such as “male” and “female” to refer to the social conceptions of femininity and masculinity. Gender is thus distinct from “sex,” which refers to the biological markers associated with being born a man, woman, or gender-diverse person. While there is meaningful debate about the overall utility of gendered distinctions, here, I believe them to be useful to illustrate how society conceptualizes both conflict and victimhood.

¹¹ THE 9/11 COMMISSION REPORT: FINAL REPORT OF THE NATIONAL COMMISSION ON TERRORIST ATTACKS UPON THE UNITED STATES 4, 56 (authorized ed., 2004).

¹² See generally JOSHUA S. GOLDSTEIN, WAR AND GENDER: HOW GENDER SHAPES THE WAR SYSTEM AND VICE VERSA (2001).

¹³ Susan N. Herman, *Women and Terrorism: Keynote Address*, 31 WOMEN'S RTS. L. REP. 258, 259 (2010).

¹⁴ Jamille Bigio & Rachel Vogelstein, *Why Understanding the Role of Women Is Vital in the Fight against Terrorism*, THE WASH. POST (Sept. 10, 2019, 5:35 PM), <https://www.washingtonpost.com/opinions/2019/09/10/why-understanding-role-women-is-vital-fight-against-terrorism/> [hereinafter *The Role of Women in Terrorism*]; Jamille Bigio & Rachel Vogelstein, *Women and Terrorism: Hidden Threats, Forgotten Partners*, COUNCIL ON FOREIGN RELS. (May 2019), https://cdn.cfr.org/sites/default/files/report_pdf/Discussion_Paper_Bigio_Vogelstein_Terrorism_OR.pdf [hereinafter *Hidden Threats, Forgotten Partners*]; Charlesworth & Chinkin, *supra* note 7.

¹⁵ See *Hidden Threats, Forgotten Partners*, *supra* note 14, at 6.

¹⁶ Neta C. Crawford, *The U.S. Budgetary Costs of the Post-9/11 Wars*, WATSON INST. INT'L & PUB. AFF.: COST OF WAR 1 (Sept. 1, 2021). Note that this figure is inclusive of the \$5.8 trillion which has been spent in the two decades since 9/11 and also the estimated future obligations (*i.e.*, long-term medical care and disability payments for veterans), “which will likely exceed \$2.2 trillion in federal spending.”

housing insecurity and environmental decimation.¹⁷ Despite this massive expenditure of both resources and human life, the number of extremist fighters for the Islamic State alone has increased by over 200 percent since 2001.¹⁸

Domestically, the counterterrorism landscape is also being called upon to shift in response to growing concerns within the country. The Federal Bureau of Investigation (“FBI”), the primary federal agency responsible for investigating terrorism, has warned that domestic terrorism poses a persistent and ever-progressing threat to the country’s citizens and its economy.¹⁹ In recent years, in fact, domestic terrorists have caused more arrests and deaths nationally than international extremists, inspired primarily by violent racial biases and anti-authority sentiments.²⁰ As the FBI adapts to the unique exigencies across international and domestic terrorism, it must also account for broadening demographics, as women are becoming increasingly radicalized on a global scale.²¹ With these new challenges, compounded by the destabilizing effects of U.S. withdrawal from Afghanistan, the country now finds itself on the precipice of a new era for national security.²²

Having failed to cabin the spread of terrorism at an enormous cost, the U.S. must now adopt new strategies in its counterterrorism efforts. The country’s approach to counterterrorism has historically been chided as erratic and inconsistent. Where it *has* been consistent, however, is in its repeated failures to recognize the critical and lethal role of women in terrorism.²³ The highly militarized scripts of the post-9/11 era have suppressed international legal developments acknowledging the need for women’s participation in conflict resolution, while simultaneously creating restrictive categories which ignore the possibility

¹⁷ Crawford, *supra* note 16; David Vine et al., *Creating Refugees: Displacement Caused by the United States’ Post 9/11 Wars*, WATSON INST. INT’L & PUB. AFF.: COSTS OF WAR 1 (Aug. 19, 2021). The displacement figure is a conservative estimate encompassing people living in Afghanistan, Iraq, Pakistan, Yemen, Somalia, the Philippines, Libya, and Syria. With regard to Syria, the calculation only accounted for “displacement experienced in the five Syrian provinces where U.S. military personnel have fought and operated.”; *Refugees & Health*, WATSON INST. INT’L & PUB. AFF.: COSTS OF WAR (last updated Aug. 1, 2021), <https://watson.brown.edu/costsofwar/costs/human/refugees>; Neta C. Crawford & Catherine Lutz, *Human Cost of Post 9/11 Wars: Direct War Deaths in Major War Zones, Afghanistan & Pakistan (Oct. 2001 – Aug. 2021); Iraq (March 2003 – Aug. 2021); Syria (Sept. 2014 – May 2021); Yemen (Oct. 2002–Aug. 2021) and Other Post-9/11 War Zones*, WATSON INST. INT’L & PUB. AFF.: COSTS OF WAR (Sept. 1, 2021).

¹⁸ *The Role of Women in Terrorism*, *supra* note 14.

¹⁹ *Confronting the Rise of Domestic Terrorism in the Homeland: Hearing Before the Comm. on Homeland Sec. H.R. 116 Cong.* (2019) (testimony of Michael McGarrity, Counterterrorism Chief of the FBI).

²⁰ *Id.*

²¹ See generally Farah Pandith et al., *Female Extremists in QAnon and ISIS Are on the Rise. We Need a New Strategy to Combat Them*, NBC NEWS (Dec. 11, 2020, 3:30 AM), <https://www.nbcnews.com/think/opinion/female-extremists-qanon-isis-are-rise-we-need-new-strategy-ncna1250619>.

²² Nilofar Sakhi & Annie Pforzheimer, *Missing the Bigger Implications of US Withdrawal from Afghanistan*, MIDDLE E. INST. (July 29, 2021), <https://www.mei.edu/publications/missing-bigger-implications-us-withdrawal-afghanistan>.

²³ Sebastian Rotella, *Global Right-Wing Extremism Networks Are Growing. The U.S. Is Just Now Catching Up*, PROPUBLICA (Jan. 22, 2021, 5:30 AM), <https://www.propublica.org/article/global-right-wing-extremism-networks-are-growing-the-u-s-is-just-now-catching-up>; *The Role of Women in Terrorism*, *supra* note 14.

of women as bona fide security threats.²⁴ Under this framework, women are neither the problem nor the solution. The resulting erasure effectuates an “affirmation of a gendered international law and a continuation of a model of international relations ignorant of its gendered underpinnings.”²⁵ Basing counterterrorism efforts and accountability mechanisms on an outdated archetype of the passive woman not only cedes power to terrorist regimes, but it also essentializes femininity at the expense of national security.

As we adapt our policies to the changing times, the U.S. must create a uniformed approach across relevant federal agencies for the implementation of the Council on Foreign Relations' (“CFR”) 2019 proposals and UNSCR 1325. This will ideally result in more robust research into the radicalization of women and also create an influx of women participating professionally in U.S. security programs. This comment argues that U.S. counterterrorism strategy critically ignores the roles that women play in the perpetration of violent extremism. Part II delves into the historical underpinnings of female involvement in various global terrorist operations. Next, Part III discusses the geo-political forces which have led to a rise in women as perpetrators. Part IV turns its focus back to the United States, analyzing its current approach to national security as it relates to counterterrorism. Finally, Part V summarizes some of the prevailing recommendations for how the United States can adopt a more nuanced approach to how it treats the intersection of femininity and counterterrorism.

II. Background

Throughout history, women have been involved in terrorism in a myriad of contexts. From the Black Widows in Chechnya to the women's wing of the Ku Klux Klan, women have long been both perpetrating and normalizing terrorist-sponsored violence.²⁶ Despite this, terrorism is generally considered a male-dominated arena.²⁷ This section aims to elucidate some of the key roles that women have played in notable terrorist organizations, while also establishing how patriarchal structures have often worked to relegate women to ancillary positions within the operations.

A. Early Female Terrorist Participation

Female involvement in terrorist groups garnered early attention in the twentieth century with the upsurge of domestic terror organizations in both Latin

²⁴ Gina Heathcote, *Feminist Reflections on the “End” of the War on Terror*, 11 MELB. J. INT'L L. 277, 278 (2010).

²⁵ *Id.* at 296.

²⁶ Mia Bloom & Ayse Lokmangolu, *From Pawns to Knights: The Changing Role of Women's Agency in Terrorism?*, STUD. CONFLICT & TERRORISM 1-2 (2020) (noting that female terrorists are often referenced in popular media by “patriarchally deemed names,” including “jihadi brides” and “Black Widows”).

²⁷ Mia Mellissa Bloom, *Death Becomes Her: The Changing Nature of Women's Role in Terror*, 11 GEO J. INT'L AFF. 91, 91 (2010) [hereinafter *Death Becomes Her*].

America and Europe.²⁸ In Latin America, the rise and fall of numerous dictatorships and violent military regimes in the post-WWII era destabilized much of the region.²⁹ The resulting disparities in education, jobs and wealth spurred mass, armed mobilizations in several countries.³⁰

Traditionally, Latin American countries have observed rigid gender roles rooted in part in the Catholicism of the Spanish conquerors who colonized the region in the fifteenth century.³¹ The concept of *machismo* prescribes a masculine role for men which “assigns their zone of influence outside of the home.”³² While *marianismo* “restrict[ed] women’s influence to the home, keeping chaste and caring for the family, much like the idyllic Virgin Mary.”³³

However, in the wake of political upheaval, women were called upon to defy such patriarchal conventions and act as combatants against oppressive dictatorial regimes. Guerilla opposition movements like the Sandinistas of Nicaragua, the Revolutionary Armed Forces of Colombia (“FARC”), and Guatemala’s National Revolutionary Unity guerrillas saw unprecedented levels of participation from local women.³⁴ Against traditional notions of *marianismo*, these female combatants fought alongside men, and many even ascended to positions of power and leadership within such organizations.³⁵

Around the same time in Europe, women were similarly engaged across various levels of terrorist organizations, many of which were spawned by ethno-nationalist conflicts.³⁶ Women founded militant groups such as Germany’s Baader-Meinhof Gang – named after its female ideological leader, Ulrike Meinhof – and played critical support roles in conflicts such as Spain’s Basque nationalist movements, of which women comprised about seventeen percent of the separatist party.³⁷ Like their Latin American counterparts, the European women of such conflicts expanded their roles beyond the home and onto the metaphorical battlefield. For example, in Northern Ireland, throughout the decades-long period coined “the Troubles,” women were amongst the most dangerous operatives for the Provisional Irish Republican Army (“PIRA”).³⁸ Notably, sis-

²⁸ Rachael Lavina, *Women in Terrorism: How the Rise of Female Terrorists Impacts International Law*, 30 CONN. J. INT’L L. 241, 244 (2015).

²⁹ *Id.* at 245.

³⁰ *Id.*

³¹ Margaret Gonzalez-Perez, *Women Terrorists*, 31 WOMEN’S RTS. L. REP. 286, 289 (2010).

³² *Id.*

³³ *Id.*

³⁴ *Id.* at 289-90.

³⁵ *Id.* at 290.

³⁶ Bloom & Lokmangolu, *supra* note 26, at 3.

³⁷ *Id.*

³⁸ *Id.*; Women’s involvement in the PIRA is particularly illustrative of the long-standing history of women acting as violent operatives. In the late 1960s the IRA fractioned into two distinct groups: the “Officials” who were based in Dublin and advocated for peaceful means to united Ireland, and the “Provisionals” who were based in Belfast and resorted to violent tactics to achieve unity. While the PIRA is not presently listed as a proscribed terrorist group by the State Department, the group is notable for its repeated assassinations, sniper attacks and bombing campaigns. See Kathryn Gregory, *Provisional Irish Republican Army (IRA) (aka, PIRA, “the provos,” Óglaigh na hÉireann) (UK separatists)*, COUNCIL ON

ters Dolours and Marian Price were responsible for hundreds of injuries and several deaths following multiple bombing campaigns on London in the early 1970s.³⁹ The Price sisters made headlines when they were later sentenced to life in prison for their involvement in the March London Bomb attacks.⁴⁰ Curiously, however, subsequent studies and coverage of the PIRA seldom includes analyses of women as combatants.⁴¹

The United States offers comparatively few historic examples of female membership, let alone leadership, within terrorist organizations.⁴² In the case of the Ku Klux Klan, this is due to the group's explicit rejection of feminism in its entirety.⁴³ Because the Ku Klux Klan conceptualizes women's utility to its white supremacy movement within the confines of domesticity, women were not permitted to hold formal roles within the organization, and were instead limited to furthering "their primary goal [of] raising as many white Christian babies as possible," while also participating in marches, distributing literature, and cooking.⁴⁴

B. The Modern Era of Female Involvement

Although acts of terrorism continue to occur both globally and domestically, from a U.S. national security standpoint, the modern conversation is largely centered on jihadist groups out of the Middle East and Northern Africa. The term "jihad," translated literally, means "to strive."⁴⁵ There are two distinct classifications of jihad: Greater Jihad, the internal struggle against sin, and Lesser Jihad, the violent subject that is more well-known in modern media.⁴⁶ In recent decades, Western news outlets have conflated Lesser Jihad with any act of savagery committed against a U.S. citizen by a radical group. The *Qur'an*, however, only permits defensive acts, stating that: "You may fight in the cause of God against those who attack you, but do not aggress. God does not love the aggressors."⁴⁷ Suicide, a popular form of martyrdom by modern jihadists, is also expressly forbidden in the *Qur'an*.⁴⁸ The terrorist acts perpetrated under the guise of jihadism are therefore more aptly characterized as military strategy rather than Islamic sacrament. Nevertheless, the weaponization of jihadism and the strategic manipu-

FOREIGN RELS. (Mar. 16, 2010, 8:00 AM), <https://www.cfr.org/background/provisional-irish-republican-army-ira-aka-pira-provos-oglaigh-na-heireann-uk>; see generally *Designated Foreign Terrorist Organizations*, U.S. DEP'T OF STATE: BUREAU OF COUNTERTERRORISM, <https://www.state.gov/foreign-terrorist-organizations/> (last visited Oct. 9, 2022).

³⁹ Bloom & Lokmangolu, *supra* note 26, at 3; see generally PATRICK RADDEN KEEFFE, *SAY NOTHING: A TRUE STORY OF MURDER AND MEMORY IN NORTHERN IRELAND* (1st ed. 2019).

⁴⁰ Bloom & Lokmangolu, *supra* note 26, at 3.

⁴¹ *Id.*

⁴² Gonzalez-Perez, *Women Terrorists*, *supra* note 31, at 290.

⁴³ *Id.* at 291.

⁴⁴ *Id.*

⁴⁵ Margaret Gonzalez-Perez, *The False Islamization of Female Suicide Bombers*, 28 *GEND. ISSUES* 50, 52 (2011).

⁴⁶ *Id.*

⁴⁷ *The Qur'an*, (2:190).

⁴⁸ *Id.* at (2:195).

lation of religious doctrine have created one of the greatest threats to U.S. national security in recent decades.

Jihadism has long been inherently patriarchal, both as a result of its interpretation of Islam and also the societal norms “from which many jihadist ideologues emerged.”⁴⁹ Prior to the 2000s, extremist groups throughout these regions predominantly followed traditional Salafi-jihadi teachings, which largely prohibited women’s participation on the battlefield.⁵⁰ Women’s roles in jihad were thus limited to supportive and domestic functions.⁵¹ In a similar vein to the women of the early twentieth century Ku Klux Klan, jihadist groups believed women were useful to their movement insofar as they were able to birth and indoctrinate future generations of radicals.⁵² Women were also tasked with their children’s religious upbringing, as well as supporting their husbands, whether that be through keeping his house, or even raising money for the cause.⁵³ What women could not do, however, was participate in combat.

Twenty-first century wars and the reactionary security measures implemented after the 9/11 terrorist attacks have presented new hurdles for the proliferation and success of radical jihadism. As militant organizations have had to adjust to new counterterrorism crackdowns, many of the groups have been forced to loosen their ideological parameters to permit women to participate in combat.⁵⁴ In the context of the Islamic State, military and territorial losses have increased the pressure to expand its forces in the name of preserving the physical caliphate.⁵⁵ As these losses have continued to mount, publications out of the Islamic State have reneged the traditional patriarchal underpinnings of jihad, going as far as to say that women are not only permitted to engage in combat, but are now religiously obligated to fight on behalf of the caliphate.⁵⁶ These new pressures have allowed for women to transition from peripheral, supporting roles to more forward facing, operational positions.⁵⁷ Chief amongst those roles is that of a suicide bomber.

⁴⁹ Lydia Khalil, *Behind the Veil: Women in Jihad after the Caliphate*, LOWY INST. (June 25, 2019), <https://www.lowyinstitute.org/publications/behind-veil-women-jihad-after-caliphate>.

⁵⁰ *Id.* It should be noted, however, that while this comment focuses its analysis on women within Jihadist groups, women were used as combatants in other, non-Jihadist secular groups throughout the Greater Middle East prior to the 21st century. The first-known female suicide attack was perpetrated by Sana’a Youcef Mehadli on behalf of the Syrian Social Nationalist Party in 1985. Further, groups such as the PKK began using female bombers as early as the 1990s. For a more in-depth history of women as combatants, see Ken Sofer & Jennifer Addison, *The Unaddressed Threat of Female Suicide Bombers: Women Terrorists Are an Increasing Problem*, CTR. FOR AM. PROGRESS (Jun. 5, 2012), <https://www.americanprogress.org/issues/security/news/2012/01/05/the-unaddressed-threat-of-female-suicide-bombers/>; see also Mia Bloom, *Mother. Daughter. Sister. Bomber.*, 61 Bull. Atomic Scientists 54, 56 (2005).

⁵¹ Khalil, *supra* note 49.

⁵² *Id.*

⁵³ *Id.*

⁵⁴ *Id.*

⁵⁵ Khalil, *supra* note 49.

⁵⁶ *Id.*

⁵⁷ *Death Becomes Her*, *supra* note 27, at 92.

Globally, female suicide bombers were responsible for over 230 attacks between the years of 1985 and 2008.⁵⁸ In 2017 alone, the Global Extremism Monitor (“GEM”) recorded 100 suicide attacks conducted by 181 female militants.⁵⁹ These operations resulted in a successful detonation of explosives 4 out of 5 times on average and the deaths of 279 people, 94 percent of whom were civilians.⁶⁰ Two of the main groups deploying these female suicide bombers are jihadist organizations, Boko Haram and ISIS in Iraq and Syria.⁶¹ The face of foreign terrorism is therefore evolving. A narrative which was once characterized by the violent adventures of zealously devoted men is now desperately searching to regain its footing within the home. But women’s participation in combat does more than just bolster jihadi forces – it legitimizes it as a “purposeful social revolution, a return to the true Islamic way of life and a means to a complete society.”⁶²

On the domestic front, United States officials are also grappling with how to approach the rising threat of far right-wing extremism. Once fringe networks of political conspiracy theorists are now becoming progressively more mainstream in the wake of Donald Trump’s presidency. Perhaps most notorious amongst them is the cultlike conspiracy movement, QAnon.

QAnon refers generally to a collection of online conspiracy theories which falsely allege that the “world is run by a cabal of Satan-worshiping pedophiles” comprised mainly of major Democratic political figures.⁶³ QAnon began in October 2017 with a post on a message board called “4chan” from an anonymous account using the moniker “Q Clearance Patriot.”⁶⁴ As the online lore grew, the name was later shortened to just “Q.” Q claims to be a government official with access to classified information from the Trump administration, and while their identity remains unknown, Q has amassed tens of thousands of online followers.⁶⁵ Similar to trends in Jihadi extremism, the U.S. right-wing extremist movement is evolving to encompass and embolden new swaths of society, notably gaining significant support amongst women. While QAnon gained its initial traction on hypermasculine message boards, its supporters can presently be found proselytizing across the internet – from Peloton forums to Instagram.⁶⁶

Q’s influence has also bled into the offline world. Like Islamic State extremist groups, QAnon appeals to women by exploiting their altruism and maternal in-

⁵⁸ *Death Becomes Her*, *supra* note 27, at 92.

⁵⁹ GLOBAL EXTREMISM MONITOR: VIOLENT ISLAMIST EXTREMISM IN 2017, TONY BLAIR INST. FOR GLOB. CHANGE 68 (Sept. 2018), <https://institute.global/sites/default/files/inline-files/Global%20Extremism%20Monitor%202017.pdf>.

⁶⁰ *Id.*

⁶¹ *Id.*

⁶² Khalil, *supra* note 49.

⁶³ Kevin Roose, *What Is QAnon, the Viral Pro-Trump Conspiracy Theory?*, N.Y. TIMES (Sept. 3, 2021), <https://www.nytimes.com/article/what-is-qanon.html>.

⁶⁴ Kevin Roose, *supra* note 63.

⁶⁵ *Id.*

⁶⁶ Lili Loofbourow, *It Makes Perfect Sense that QAnon Took off with Women this Summer*, SLATE (Sept. 18, 2020, 12:58 PM), <https://slate.com/news-and-politics/2020/09/qanon-women-why.html>.

stinct to protect children.”⁶⁷ The messaging has proven its salience amongst American women, having inspired numerous violent attacks. For example, Jessica Prim, a female QAnon supporter, was arrested in May of 2020 for carrying one dozen knives and livestreaming her trip to New York City to assassinate now-President Joe Biden.⁶⁸ Mere months later, authorities arrested and charged another Q-supporting woman with aggravated assault after she drove her car into a group of people that she claimed were kidnapping children.⁶⁹ What started as online threats are increasingly becoming offline realities. As women become more meaningfully involved in both global and domestic terrorist operations, it is critical that the U.S. reimagines its approach to counterterrorism efforts, starting with an investigation of how and why women are being recruited.

III. Discussion

The expanded roles of women in terrorist organizations tell two opposing stories, each true in their own right: one of women as organizers and perpetrators of unspeakable violence, and the other of women as agency-lacking collaterals of conflict. While foreign extremist groups systematically subjugate women through means of sex trafficking, financial extortion, and forced recruitment, this section specially delves into the rise of women as perpetrators, rather than as victims. The research on female domestic terrorism is relatively sparse. As such, this section focuses primarily on jihadist extremism, but still notes the stark parallels between how jihadi and far-right groups appeal to women through their recruitment mechanisms.⁷⁰

A. Feminine Stereotypes

The myth that women exist solely as ancillary actors, or victims of terrorist violence, is steeped in patriarchal notions of femininity which seek to depict women as custodians of civility and therefore separate them from conflict.⁷¹ Susan Herman, the former President of the ACLU, suggests that this false duality may be traced to three underlying stereotypes:

First, that women are apolitical; second, that division of labor between men and women is based on physical differences in the ability of men and

⁶⁷ Pandith et al., *supra* note 21.

⁶⁸ *Id.*

⁶⁹ *Id.*

⁷⁰ In decades past, left-wing extremism has been a concern of U.S. national security policy with groups such as the Weather Underground and the Provisional Party of Communists engaging in guerilla warfare. However, acts of violence by left-wing extremist groups has drastically dropped since the 1980s. While left-wing groups have historically featured a higher percentage of women in their ranks, this comment focuses on right-wing groups as they are the more relevant threat to current national security interests. Further, the increase of female membership in right-wing groups is of particular note for future policy recommendations. For more information on the history of left-wing extremism in the U.S., see Karl A. Seger, *Left-Wing Extremism: The Current Threat*, CTR. FOR HUM. RELIABILITY STUD. (Apr. 2001).

⁷¹ Herman, *supra* note 13, at 261.

Gender and Counterterrorism: United States' Underestimation

women to undertake certain acts, and third, that a woman's primary purpose and function is to be a mother and a wife rather than having an individual identity of her own.⁷²

Through the "masculinization of conflict" women are cast as secondary characters in a male-dominated story.⁷³ Thus, women's involvement in combat not only flies in the face of such deeply entrenched sexism, but it may also be perceived as a direct challenge to male authority. When women are involved, it is said to be a reflection of the impotence of male leadership, rather than the volition of the female fighter.⁷⁴ Female terrorists are in turn posited as symptoms of failures rather than agents of chaos.

The practical effects of relying on stereotypes to build criminal profiles have been borne out through the successes of female terrorists. In the context of the War on Terror, antiquated views of gender are further compounded by cultural paternalism. Americans, as a function of Western liberalism, often paint Islamic women as being oppressed, rather than emboldened by their environments.⁷⁵ This emphasis on victimhood and passivity is then weaponized by jihadist groups to bolster the efficacy of their female insurgents.⁷⁶ The result is two-fold. First, female terrorists are more lethal, killing roughly four times more people on average than their male equivalents, in part because they are profiled less often and less scrupulously by security officials.⁷⁷ Second, the shock value of women operating as successful combatants, capable of evading advanced national security mechanisms, increases their propaganda value in a war which relies heavily on alarmism.⁷⁸

To better protect ourselves, we need not eschew of all notions of gender. Gender, and how one is socialized in relation to it, can be a critical informant into a person's motivations. However, the essentialization of femininity comes at a grim cost. Depoliticizing female violence "denies women agency and fails to acknowledge their perceived grievances [which] leads to dangerous gaps in security response."⁷⁹ There must be a greater emphasis placed on investigating the spectrum of factors which may motivate a woman to participate in extremism.

⁷² Herman, *supra* note 13, at 261-62.

⁷³ *Id.* at 263.

⁷⁴ Frances S. Hasso, *Discursive and Political Deployments by/of the 2002 Palestinian Women Suicide Bombers/Martyrs*, 81 FEMINIST REV. 23, 36 (2005).

⁷⁵ Huckerby, *supra* note 8, at 543; *see also* Cyra Akila Choudhury, *Empowerment or Estrangement?: Liberal Feminism's Visions of the "Progress" of Muslim Women*, 39 U. BALTIMORE L. F. 153, 153 (2009).

⁷⁶ *Death Becomes Her*, *supra* note 27, at 93.

⁷⁷ *Id.*

⁷⁸ *Id.*

⁷⁹ U.N. SEC. COUNCIL. COUNTER-TERRORISM COMM. EXEC. DIRECTORATE, GENDER DIMENSIONS OF THE RESPONSE TO RETURNING FOREIGN TERRORIST FIGHTERS: RESEARCH PERSPECTIVES 11 (2019).

B. The Rise in Female Recruitment

Presently, there is very little research regarding women's involvement in terrorism.⁸⁰ Material on jihadist women tends to portray them as either victims of terror, or alternatively, as "depressed, crazy, suicidal, or psychopathic" perpetrators whose actions were spurred under the pressure of a man.⁸¹ What little research does exist, however, is largely focused on the phenomenon of female suicide bombers.⁸² Studies are thus limited to anecdotal evidence such as interviews with the bomber's friends and families.⁸³ Even then, the data offer little insight into the rise in female terrorism. With combatants representing only a sliver of the roles for female operatives, the available research belies the motivations of women participating as medics, guards, recruiters, and general sympathizers.⁸⁴

While we may not be able to pinpoint *why* women are increasingly attracted to extremism, we can deduce *how* their involvement is coming about. As a highly accessible and ubiquitous form of communication, social media has become the weapon of choice for both domestic and foreign extremist groups. Recruitment efforts, although obviously tailored to the nuances of the group's target populations, rely generally on appeals to the "inherent altruism" of women.⁸⁵ The Islamic State, for example, utilizes online campaigns which tout the importance of camaraderie and sisterhood.⁸⁶ This sort of positive messaging is then spun into calls to action around issues such as helping the children who have been orphaned under the Assad regime in Syria with hopes of attracting seemingly well-meaning women into their ranks.⁸⁷

Women themselves are also powerful tools for jihadist recruitment, particularly in Western countries. In fact, studies suggest that ISIS' reliance on Western female recruiters is so substantial that there are female-run media factions which hold quasi-official standing in the broader ISIS media wing.⁸⁸ As recruiters, Western women will often prey upon teenage girls' discomfort with interacting with strange men online to gain their confidence and draw them into the larger movement under the guise of inclusion and group-belonging.⁸⁹ The potential for community is then sweetened with promises of material stability and a greater

⁸⁰ *Death Becomes Her*, *supra* note 27, at 92.

⁸¹ *Id.*

⁸² Huckerby, *supra* note 8, at 551.

⁸³ *Death Becomes Her*, *supra* note 27, at 92.

⁸⁴ Amanda N. Spencer, *The Hidden Face of Terrorism: An Analysis of the Women in Islamic State*, 9 J. STRATEGIC SEC. 74, 91 (2016) (detailing that the findings were derived from both quantitative analyses and case studies using a sample of 72 women who had been involved in ISIS, both within the U.S. and abroad. The data from these individual cases were based on secondary sources including open-source information-media reports, web-based content, public data, and academic research studies. For a more detailed discussion of her processes and findings, *see* pages 89-98).

⁸⁵ Pandith et al., *supra* note 21.

⁸⁶ *Hidden Threats, Forgotten Partners*, *supra* note 14, at 5.

⁸⁷ Pandith et al., *supra* note 21.

⁸⁸ Spencer, *supra* note 84, at 85.

⁸⁹ Pandith et al., *supra* note 21.

sense of agency under the caliphate, making a life of extremism increasingly attractive.⁹⁰

American-based groups employ similar tactics. In the summer of 2020, QAnon launched a social media campaign, cleverly named "Save the Children."⁹¹ The slogan co-opted the name of a legitimate anti-trafficking charity in order to grow its conspiracy that Democrats and Hollywood elites are engaged in a child-trafficking ring.⁹² Save the Children content quickly spread across various social media platforms including Facebook, Instagram, Twitter, and Tik Tok, and is credited with revitalizing the QAnon community after Facebook took actions to curtail its influence.⁹³

While various platforms tried to limit the movement's reach, the misinformation was difficult to contain due to its aesthetic appeal and the message's digestibility. Visually speaking, much of the Save the Children misinformation is disseminated through the use of brief videos and pastel, sharable graphics.⁹⁴ Propagating such weighty and unfounded accusations in this way has resulted in "a kind of aesthetic context collapse."⁹⁵ While the carefully crafted graphics catch women's eyes, the brevity inherent to infographics and Instagram videos lends itself to the vagueness of the underlying claims. The content is thus "not only compelling and dramatic . . . [but] also easily shared in other parenting groups with little indication of their far-right origins."⁹⁶ At the center of the messaging is again an ethos-laden appeal to women predicated on maternal duty and the belonging to a united front.

Recruitment itself is motivated by a number of factors. As previously discussed, one of the major driving forces behind the increasing numbers of female recruits is that women are less likely to be profiled as terrorists and are able to go undetected in situations where their male counterparts may be more conspicuous.⁹⁷ Female terrorists also elicit a number of emotional responses. The shift away from male-dominated combat has notably created significant anxiety as governments are being forced to reimagine their enemies.⁹⁸ This fear of the unknown has resulted in women receiving, on average, eight times more media attention than their male counterparts.⁹⁹ As a result, terrorist groups are incentivized to increasingly recruit women, as they are statistically more effective at

⁹⁰ Spencer, *supra* note 84, at 85.

⁹¹ Chuck Goudie et al., *More Women Being Lured into Extremist Groups Like QAnon during Pandemic, Educators Say*, ABC 7 CHICAGO (Mar. 16, 2021), <https://abc7chicago.com/women-qanon-conspiracy-covid-pandemic-donald-trump/10424353/>.

⁹² Kevin Roose, *How 'Save the Children' Is Keeping QAnon Alive*, N.Y. TIMES (Sept. 28, 2020), <https://www.nytimes.com/2020/09/28/technology/save-the-children-qanon.html>.

⁹³ *Id.*

⁹⁴ Loofbourow, *supra* note 66.

⁹⁵ *Id.*

⁹⁶ Annie Kelly, *Mothers for QAnon*, N.Y. TIMES (Sept. 11, 2020), <https://www.nytimes.com/2020/09/10/opinion/qanon-women-conspiracy.html>.

⁹⁷ Lavina, *supra* note 28, at 250.

⁹⁸ *Id.* at 251.

⁹⁹ *Id.*

inciting fear and outrage in their targets.¹⁰⁰ It is therefore critical to account not only for the modalities in which women are being actively recruited to extremist organizations, but also for the underlying motivations that cause said groups to seek out female participation.

IV. Analysis and Recommendations

As women's contributions to violent extremism have grown, the United States has begun paying closer attention to the threat posed by women and amending their previous approaches to counterterrorism. However, there is still significant work to be done in defense of U.S. security interests. This section provides a brief overview of the country's current counterterrorism measures and expounds on some of the prevailing policy recommendations for the future.

A. Current Approaches to Counterterrorism in the U.S.

In the immediate aftermath of the 9/11 attacks on the World Trade Center, the United States enacted the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act (the "Patriot Act").¹⁰¹ The Patriot Act was born out both necessity and also a collective, national panic. It hurriedly created several new terrorism-related federal crimes and provided specific government agencies with vastly expanded surveillance powers.¹⁰² The Act facilitated the breadth of such surveillance powers by lowering the standard of proof required for a search warrant from "probable cause" to "reasonable cause."¹⁰³ While the Act is not entirely controversial, it has notably resulted in racial and gendered profiling.¹⁰⁴ The Bush Administration declared a ban on racial and ethnic profiling by federal agencies in June of 2003, but this ban notably did not encompass gender.¹⁰⁵ As such, men continue to be searched at an outsized rate, while women are able to gain much easier access to soft targets domestically.¹⁰⁶

On an international scale, the United Nations Security Council ("UNSC") similarly launched into action in the weeks following 9/11. In late October of 2001, the UNSC unanimously adopted Resolution 1373, which bound all member states to a terrorist intelligence exchange scheme.¹⁰⁷ The Resolution further established the UNSC Counterterrorism Council which was tasked with enforcing

¹⁰⁰ Lavina, *supra* note 28, at 251.

¹⁰¹ See generally Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA PATRIOT ACT) Act of 2001, 115 STAT. 272, 107-56 (2001).

¹⁰² *Surveillance under the USA/Patriot Act*, ACLU, <https://www.aclu.org/other/surveillance-under-usapatriot-act>.

¹⁰³ 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, 677 (2007).

¹⁰⁴ *Id.* at 689.

¹⁰⁵ *Id.*

¹⁰⁶ Lavina, *supra* note 28, at 253.

¹⁰⁷ S.C. Res. 1373 (Sept. 28, 2001).

compliance amongst the member states.¹⁰⁸ What the resolution did *not* do, however, was codify a specific definition for the term “terrorist.”¹⁰⁹ At the time, this created a concern that terrorism may become a sort of amorphous offense under which authoritarian regimes could prosecute non-violent opposition, and in turn legitimize human rights violations.¹¹⁰ Yet, under the pressure and immediacy of the circumstances, the Resolution prevailed.

Curiously, in successive resolutions, the UNSC has continuously declined to provide a concrete definition.¹¹¹ Although this seems to create a nefarious catch-all, the Council’s inaction has actually diluted member states’ prosecutorial power.¹¹² Absent a universal definition for “terrorism,” member states are under no obligation to find a mutual definition in inter-state matters.¹¹³ The result is a jurisdictional tangle which often precludes extradition, and ultimately, criminal liability.¹¹⁴ In the United States, federal law similarly does not define terrorism. Instead, law enforcement and federal agencies rely on a litany of definitions, which are often colored by the agenda of the drafter.¹¹⁵ The exigency underlying early terrorism legislation encouraged law makers to paint with broad strokes. However, now, over twenty years later, such boundless power has made it difficult to concretely name the enemy and has neutered states’ ability to effectuate justice.

In the years following the Patriot Act and Resolution 1373, the U.S. has enacted a slew of female-oriented counterterrorism legislation, including the 2011 U.S. National Action Plan on Women, Peace and Security, the 2016 joint U.S. State Department-U.S. Agency for International Development (“USAID”) strategy to counter violent extremism, and the 2017 Women, Peace and Security Act, amongst others.¹¹⁶ Unfortunately, these policy initiatives are rendered somewhat moot as the “broader U.S. counterterrorism policy, including the 2011 and 2018 U.S. National Strategies for Counterterrorism . . . largely ignore[s] women” and relegates “only a negligible fraction of the broader budget” to such efforts.¹¹⁷

The FBI has similarly failed to fully realize the threat that female terrorists pose to the United States. Following 9/11, the FBI began paying informants

¹⁰⁸ S.C. Res. 1373, *supra* note 107; *see also* Matias-Martinsen, *supra* note 4, at 41.

¹⁰⁹ Matias-Martinson, *supra* note 4, at 41.

¹¹⁰ *Id.*

¹¹¹ Ben Saul, *The Legal Black Hole in United Nations Counterterrorism*, IPI GLOB. OBSERVATORY (June 2, 2021), <https://theglobalobservatory.org/2021/06/the-legal-black-hole-in-united-nations-counterterrorism/>.

¹¹² *Id.*

¹¹³ *Id.*

¹¹⁴ *Id.*

¹¹⁵ *See* Sudha Setty, *What’s in a Name? How Nations Define Terrorism Ten Years after 9/11*, 33 U. PA. J. INT’L L. 1, 18-19 (2011); *see also* Nicholas J. Perry, *The Numerous Federal Legal Definitions of Terrorism: The Problem of Too Many Grails*, 30 J. LEGIS. 249, 249-50 (2004) (examining the “twenty-two definitions or descriptions of terrorism and related terms in federal law”).

¹¹⁶ *Hidden Threats, Forgotten Partners*, *supra* note 14, at 16.

¹¹⁷ *Id.* at 17.

within Muslim communities to aid in its terrorism investigations.¹¹⁸ Men are most often the targets of such investigations, while women are most often either informants or are leveraged to pressure their male relatives into becoming informants.¹¹⁹ Women in this sense are regarded as mere pawns rather than significant threats.

Domestically, the fight against terrorism is often stunted by sweeping arguments related to First Amendment protections of free speech and political associations. While the Patriot Act and the FBI maintain their aforementioned powers here, domestic terrorism is viewed as a “second-tier investigative priority.”¹²⁰ Further, there is little consensus amongst federal agencies on how to generally identify domestic terrorism.¹²¹ This is likely due to the fact that federal law does not define domestic terrorism as a specific criminal offense.¹²² In fact, for years the FBI abided by a *de facto* policy which “forbade [agents] from opening a domestic terrorism investigation against anyone who had not yet committed a violent act in furtherance of his cause, unless there was evidence violence was imminent.”¹²³ This policy, unsurprisingly, did not extend to foreign terrorism.¹²⁴ Although it is no longer in place, this policy, and the disjointed approach to the investigation and prosecution of domestic terrorism, reveal some of the underlying weaknesses in America’s counterterrorism efforts.

B. Policy Recommendations

If current trends continue, terrorist organizations’ reliance on female perpetrators will only rise. To promote stability and better address relevant threats, the U.S. should expand roles for women in counterterrorism efforts on an occupational level, adopt measures which account for the increasing security threat posed by women, and also create a concrete definition of “terrorism.”¹²⁵ In May

¹¹⁸ *A Decade Lost: Locating Gender in U.S. Counter-Terrorism*, NYU SCH. L. CTR. FOR HUM. RTS. & GLOB. JUST. 82 (2011).

¹¹⁹ *Id.*

¹²⁰ Ken Dilanian, *Biden May Have Trouble Cracking Down on Domestic Terrorism because of Free Speech and the FBI*, NBC NEWS (Feb. 5, 2021, 4:00 AM), <https://www.nbcnews.com/politics/justice-department/biden-may-have-trouble-cracking-down-domestic-terrorism-because-free-n1256727>.

¹²¹ *Id.*

¹²² *Id.*

¹²³ *Id.*

¹²⁴ *Id.*

¹²⁵ The federal government has incredibly wide latitude to designate individuals and groups as foreign terrorists, requiring only reasonable suspicion to justify the designation. See Michael German & Faiza Patel, *What Does It Mean to Designate the Muslim Brotherhood a Foreign Terrorist Organization?*, JUST SEC. (Jan. 26, 2017), <https://www.justsecurity.org/36826/designate-muslim-brotherhood-foreign-terrorist-organization/>; see also 18 U.S.C. 2339B (2012). Inherent to such unfettered power is the risk of over-criminalization. There is a rising concern that, if given similarly broad powers in the domestic context, the federal government would criminalize ideologies, rather than violence itself. Activists have pointed out that this may create a slippery slope which allows for the silencing of dissenting political, religious and racial minority groups; for further discussion on how the government should prioritize the safety of minority groups in future counterterrorism efforts, see Michael German & Sara Robinson, *Wrong Priorities on Fighting Terrorism*, BRENNAN CTR. FOR JUST. (Oct. 31, 2018), <https://www.brennancenter.org/our-work/research-reports/wrong-priorities-fighting-terrorism>.

of 2019, the CFR published a comprehensive series of proposals aimed at U.S. counterterrorism policy with regard to women.¹²⁶ Notably, the CFR recommends the creation of an advisory council focused on women's roles as perpetrators, and also potential mitigators, of terrorism.¹²⁷ This council, through the cooperation of the U.S. Secretary of State, Secretary of Defense, CIA Director, and USAID Administrator, would investigate "gender specific drivers of radicalization and terrorist recruitment activities."¹²⁸ To ensure a robust and thoughtful response, the CFR suggests that the council should regularly consult women leaders in shaping their prevention and deradicalization efforts.¹²⁹

They further recommend doubling female participation in the Department of State's Antiterrorism Assistance program by 2022, and propose a quota requiring all countries participating in security programs with the U.S. to have delegations which are at least 30 percent female.¹³⁰ The CFR states that "terrorist and violent extremist groups exploit the absence of women in the security sector" and that the proposed measure would work to provide women with increased opportunities while also setting a positive precedent for male and female national security officials working in harmony.¹³¹ Agencies should be weary in the framing of such efforts, however, so as to avoid the suggestion that women are only useful to counterterrorism insofar as they have novel forms of influence.¹³² Although women may provide localized expertise, inclusion of women in such programs should be rooted firmly in gender equality. Women have the right to participate in all areas of governmental decision making as members of American society and not merely as quotas.

Finally, the CFR urges the U.S. government to "invest in research on women to better understand women's participation in domestic extremist movements."¹³³ This effort should be a coordinated project amongst federal agencies and academics and should establish concrete mechanisms delineating responsibilities and data reporting structures.¹³⁴ Under this initiative, Congress should also provide a standardized, federal definition for the crime of terrorism to ensure clarity moving forward.

V. Conclusion

It has been nearly two decades since the 9/11 attacks, and while the United States has adopted various legislation related to women's roles in counterterrorism, the policies tend to lack the cohesion and resources to be integrated with

¹²⁶ See *Hidden Threats, Forgotten Partners*, *supra* note 14, at 19-23.

¹²⁷ *Id.* at 20.

¹²⁸ *Id.*

¹²⁹ *Id.* at 20-21.

¹³⁰ *Id.* at 22.

¹³¹ *Id.*

¹³² Huckerby, *supra* note 8, at 555.

¹³³ *Hidden Threats, Forgotten Partners*, *supra* note 14, at 23.

¹³⁴ *Id.*

broader security measures. Further, the efforts which *have* been made adhere to outdated notions of femininity, treating radicalized women as novelties rather than bona fide threats. Gender provides a meaningful framework for conceptualizing the modern state of terrorism, but only insofar as we are willing to recognize women as dynamic actors with motivations that reach beyond domestic duties. It is therefore critical that the U.S. reimagines its stale, sexist approach to counterterrorism and adopt a more comprehensive strategy for ensuring security for Americans.