Introduction

Political Repression in Bahrain in the Twentieth and Twenty-First Century

> Shaikh Abdulla [Al Khalifa]'s servants abducted a girl, a native of Fars. Her parents after searching for her for some time returned home and left behind one Muhammad Abdulla to continue the search. He discovered that she was being kept by Shaik Abdulla. The latter then passed her on to an Arab of Zallaq, receiving Rs. 400. Muhammad Abdulla on behalf of the parents made efforts to recover the girl. He did so on payment of Rs. 500 and on condition that he himself married her. She was pregnant and subsequently died in childbirth.[1] —C. K. Daly, 1921

The abduction, trafficking and subsequent tragic death of a young Bahraini girl by a member of the Al Khalifa ruling family in the 1920s is a potent example of the historical continuity of repression and social injustice in Bahrain. Far from being an isolated incident, or simply a criminal act, the kidnap was a facet of what Bahraini sociologist Abdulhadi Khalaf calls the Al Khalifa's 'legacy of conquest'. The Al Khalifa ruling family conquered the small Persian Gulf island of Bahrain in 1783, establishing a form of settler colonialism that subjugated the indigenous *baḥārna*[2] population. This settler colonial rule included a conquering mindset, whereby the ruling Al Khalifa family treated Bahrain's resources, subjects and lands as their rightful property and inheritance.

From the correspondence of British East India Company officials to contemporary reports published by NGOs such as the Bahrain Centre for Human Rights and the testimonies of Bahrainis, the extent of the injustice stemming from this legacy of conquest has been documented, in its varying forms, for almost 200 years. In 1829, the British naval officer

[1] 'File 9/4 Bahrain Reforms. Introduction of Reforms in Bahrain' [5v] (27/224), British Library: India Office Records and Private Papers, IOR/R/15/2/131, in Qatar Digital Library, www.qdl.qa/en/archive/81055/vdc_100023403812.0x00001c

[2] The *bahārna* (adj. *baḥrānī*) are an ethno religious group that inhabit Bahrain, an area historically existing in modern-day Bahrain as well as parts of the present-day Eastern province of Saudi Arabia.

Major Wilson noted that 'the enormities practised by the Uttoobees[3] towards the original inhabitants of Bahrain far exceed what I have ever heard of tyranny in any part of the world'.[4]

Similarly, the British naval officer Captain Taylor said of the *baḥārna* under the Al Khalifa that: 'The aboriginal inhabitants of Bahrein, now subjected to a foreign power, suffer from the tyranny of their masters more keenly than language can express'.[5] Later, in 1878, Captain Edward Law Duran described a group of Shiʿa *baḥārna* from the village of A'Ali as a 'broken-spirited helpless lot', and noted that one of the most salient aspects of his survey of Bahrain was the 'innumerable complaints of the tyranny of the Sheikhs and their tribe'.[6] In 1921, the British Political Agent in Bahrain, Major Clive Kirkpatrick Daly, submitted a scathing condemnation of the Al Khalifa to his superiors. He simply titled it, 'Oppression of Bahrain Subjects by Members of the Ruling Family'. Daly focused in particular on ʿAbd Allah bin 'Isa Al Khalifa's[7] treatment of the *baḥrānī* community, writing, 'Instances of this oppression are far too numerous to quote, but details are on record of a large number of cases of recent date, which include illegal seizure of property, wrongful imprisonment with cruelty, and political murders, for which no one has been brought to trial, and no effort made to enforce justice'.[8] Daly added that 'oppression in the past two years has amounted to terrorism',[9] and that political murders were becoming common, as were 'outrages against respectable women'.[10] Things had

[3] The Uttoobees, is the British pluralization for the Arabic *al*-Utbī. *Banī ʿUtbah* is the name for the federation of Arab clans believed to originate in Najd.

[4] Major Wilson, 'Selections from the Records of the Bombay Government' [107] (149/733), British Library: India Office Records and Private Papers, IOR/R/15/1/732, in *Qatar Digital Library*, www.qdl.qa/en/archive/81055/vdc_100022870191.0x000096

[5] Anon, 'Selections from the Records of the Bombay Government' [23] (60/733), British Library: India Office Records and Private Papers, IOR/R/15/1/732, in *Qatar Digital Library*, www.qdl.qa/en/archive/81055/vdc_100022870191.0x00003d

[6] E. L. Durand, 'Notes on the islands of Bahrain and antiquities, by Captain E. L. Durand, 1st Assistant Resident, Persian Gulf', 1878–1879, in P. Tuson and E. Quick (eds), *Records of Bahrain 1820–1960*, vol. 2, Slough, Archive Editions, 1993, p. 545.

[7] Abd Allah was the son of the then ruler, ʿIsa Al Khalifa. His brother Hamad was heir apparent at the time and the eldest son of ʿIsa. ʿIsa, who was elderly and senile, was frequently referred to by the British as being dominated and under the influence of his wife. See 'Administration Reports 1920–1924' [119v] (243/412), British Library: India Office Records and Private Papers, IOR/R/15/1/713, in *Qatar Digital Library*, www.qdl.qa/en/archive/81055/vdc_100023385511.0x00002c

[8] C. K. Daly, November 21, in P. Tuson and E. Quick (eds), *Records of Bahrain 1820–1960*, vol. 3, Slough, Archive Editions, 1993, p. 668.

[9] Ibid.

[10] 'Administration Reports 1920–1924' [84v] (173/412), British Library: India Office Records and Private Papers, IOR/R/15/1/713, in *Qatar Digital Library*, www.qdl.qa/en/archive/81055/vdc_100023385510.0x0000ae

reached such a pitch that Daly wrote that there was no longer any 'security for persons or property'.[11]

A few decades after Daly wrote about the oppression of Bahraini residents at the hands of the Al Khalifa, the British were writing about how they themselves were engaging in violence against those living in Bahrain. Charles Belgrave, a political and financial advisor to the Ruler of Bahrain between 1926 and 1957 kept a diary almost every day for his thirty years of service. On 27 May 1932 Belgrave wrote about his interrogation of a suspect in a case of rioting: 'at first they would not speak but I beat a few of them till they did speak, it was all very barbarous and illegal but on some occasions, one has to behave illegally'.[12] In the latter half of the twentieth century, Bahraini citizens accused British police working in Bahrain's security of exacting even more egregious violations of personal integrity, including torture leading to death.

Throughout the twentieth and twenty-first centuries, modernization and state building have not fundamentally changed the nature of this Al Khalifa-dominated political system, despite the growth of internal opposition. The decline of the British Empire has resulted in the ascendency of United States' hegemony in the Gulf. This has not caused a reprieve from repression for the average Bahraini. As this book will argue, repression has changed form, becoming more violent, brutal and sectarian. US policy in the region, very much determined by its maintenance of close relationships with the conservative Kingdom of Saudi Arabia, has allowed repression to flourish. Indeed, since Bahrain's Independence, repression has fundamentally changed, highlighting again how the nature of repression in Bahrain is always a dialectic between the Al Khalifa family and whoever so happens to be its suzerain at a given era.

Contemporary accounts of human rights violations published by international NGOs such as Amnesty International and Human Rights Watch, or those now documented on mobile phones, highlight the similar repression of, not the *baḥārna* per se but the Bahraini Shiʿa – abandoning the ethnic identifier. From the 1980s onwards, we see Amnesty International stating that the 'majority of protesters, Shiʿa Muslims, have complained of being politically marginalized by the ruling Sunni Al Khalifa family who dominate all aspects of political and economic life in Bahrain'.[13] In 2011, the continued discrimination and

[11] Ibid.
[12] C. Belgrave, *Papers of Charles Dalrymple-Belgrave: Transcripts of Diaries, 1926–1957*, Library of the University of Exeter, 27 May 1932.
[13] Amnesty International, *Bahrain: Reform Shelved, Repression Unleashed*, London, Amnesty International Publications, 2012, p. 3.

ongoing lack of political participation, all of which has its roots in the legacy of conquest, resulted in what has variously been called the Bahrain Uprising, the 14th February Revolution or the Lulu Uprising.

The historical continuity of this repression demands an understanding of the methods and motivations used in maintaining a system of political domination. Repression is an apt conceptual lens and a suitable means of exploring Bahrain's unequal political contract between the rulers and ruled. Specifically, this book attempts to answer the following question: how has the dominant political and social order in Bahrain prevented, controlled or constrained potential radical change to their authority since the end of the First World War? Here, the dominant political and social order refers generally to the Al Khalifa ruling family and its external allies – mostly notably Britain, Saudi Arabia and the United States but also the increasingly ambiguous assemblage of repressive actors that benefit from such activities.

Using multiple sources in English and Arabic, including British Foreign Office archives, freedom of information requests, ethnographic data, social media data and newspaper clippings, this book seeks to examine the historical evolution of repression in Bahrain, exploring its causes, forms and, occasionally, its effects. It is foremost a book about the history of political repression in Bahrain between 1920 and 2011. According to Theda Skocpol, in interpretive histories, a historical concept is used as a heuristic device to 'facilitate the selection, organisation, and interpretation of empirical material'.[14] In the case of this book, the relevant concept is 'repression', a phenomenon that continues to impact the lives of thousands of Bahrainis negatively. Indeed, many Bahrainis have suffered and still suffer from the excesses of state and non-state repression, much of it deployed under the auspices of quasi-colonial rule and neo-imperialism. In line with the emphasis on social justice, interpretive historical sociology attempts to be meaningful in the sense that it is significant to the present and relevant to audiences beyond academia. With regards to Bahrain, the study of control and repression is highly relevant and meaningful. This is a modern history of Bahrain, mediated by the concept of repression. It is hoped that it will contribute to revisionism on a region dominated by the scholarly trappings of Occidentalism and Orientalism, often manifest in multiple studies on oil, nationalism, imperialism, tribe and shaykhs. Instead, by emphasizing the importance of repression, we can examine the plight of the subaltern and how their continued subjugation is carried out.

[14] V. E. Bonnell, 'The Uses of Theory, Concepts and Comparison, in Historical Sociology', *Comparative Studies in Society and History,* vol. 22, no. 2, 1980, p. 166.

Bahrain: A Short Modern History

Bahrain is a small archipelago of thirty-three islands in the Persian Gulf. While consisting of only around 765 square kilometres, Bahrain has occupied an important place in the history of the world, from Dilmun civilization to Alexander the Great, to the Persian and British Empire. The modern city of Hamad Town, for example, was built on thousands of burial mounds, and some say it is still occupied by Jinn or the spirits of its former residents. Bahrain was, for some time, the location of the headquarters of the British Empire in the Gulf. It was also the first place on the Arabian side of the Gulf where Europeans discovered oil. Despite the pitfalls of periodization, that is to say determining clear-cut eras within history, one could say that Bahrain's modern history broadly begins in 1785, when members of the Al Khalifa family, a tribe of the *al*-Utbī clan, left Zubara in present-day Qatar and invaded Bahrain. The Al Khalifa were, and remain to many, a colonial force. They occupied Bahrain, expropriated lands and created a series of fiefdoms, extracting tithes from indigenous farmers. The Al Khalifa still rule Bahrain today, despite numerous challenges to their authority. Their longevity has been sustained primarily because of formal and informal protection arrangements with outside powers, namely Britain, the United States and Saudi Arabia.

Recently, Ala'a Shehabi and the author argue that what has emerged in Bahrain is essentially a kleptocratic ethnocracy, where one ethnic group, the Al Khalifa tribe,[15] have captured the instruments of state in order to protect their position of material and political privilege.[16] At the heart of this regime is a 'ruling core' of mostly Al Khalifa family members, who have a high degree of personalist influence in internal policy. As a result, a system of domination has been created, and is reproduced through social, political, coercive and legal institutions that reflect the 'norms, values and interests of the dominant ethnic group'.[17] The ruling family's attempts to maintain a monopoly of wealth and resources lead to inherently repressive institutions that create differences in life chances that in turn fuel social conflict. The despotic rule that has emerged has, in part, been shaped by the 'settler-ruler' mentality of the Al Khalifa. Unlike in the neighbouring shaykhdoms, such as Qatar and Kuwait, where the

[15] The Al Khalifa, originally from Kuwait, migrated to Qatar. From there, they invaded the island of Bahrain in 1781/2, ejecting the Persians who had previously ruled.
[16] A. Shehabi and M. O. Jones, *Bahrain's Uprising: Resistance and Repression in the Gulf*, London, Zed Books Ltd, 2015.
[17] T. Sellin, *Culture Conflict and Crime*, New York, NY, Social Science Research Council, 1938.

ruling families assimilated into the local population, forming a more cohesive political entity, the Al Khalifa continue to 'jealously guard their identity/image as "settler-rulers"'.[18] Fuad Khuri expands on this and notes the 'exclusiveness and non-assimilative character'[19] of the Al Khalifa, whose legitimacy was based on historically claimed rights of conquest devoid of any substantial public delegation.[20] This settler-ruler mentality became within the Al Khalifa a 'legacy of conquest', which relates to how, even to this day, 'the ruling family in Bahrain … refer to their conquest as the basis for establishing legitimacy of their dynastic rule'.[21] In short, Bahrain, its wealth and its people are seen as possessions or subjects of the conquering Al Khalifa.

While what might be described as a kleptocratic ethnocracy led by the Al Khalifa family might be a suitable shorthand for Bahrain, it is also imperative to acknowledge one of the country's most notable features: the role of external actors, especially Britain, Saudi Arabia and the United States. Indeed, if a state's most salient features define a regime, this must be reflected in the nomenclature. Toby Craig Jones argues that the Al Khalifa have only managed to perpetrate such continued repression against the indigenous people due to the protection afforded to them by outside powers.[22] On the recent uprisings, Curtis Ryan notes that 'the outcome of almost every case within the Arab uprisings has turned at least in part on the action and decisions of external powers'.[23] Initially, this was Britain, who in order to secure their domination of trade routes to India, conducted a series of treaties with tribal leaders along the Persian Coast in the 1800s. The first of these agreements was the General Maritime Treaty of 1820 that recognized the Al Khalifa as the legitimate rulers of Bahrain. A subsequent agreement in 1861 turned Bahrain into an informal British protectorate.

[18] A. Khalaf, *Contentious Politics in Bahrain: From Ethnic to National and Vice Versa*, The Fourth Nordic Conference on Middle Eastern Studies: The Middle East in a Globalising World, Oslo, 13–16 August 1998, www.smi.uib.no/pao/khalaf.html
[19] F. Khuri, *Tribe and State in Bahrain: The Transition of Social and Political Authority in an Arab State,* Chicago, IL, University of Chicago Press, 1981, p. 236.
[20] Ibid.
[21] A. Khalaf, 'Opening remarks, Bahrain: 30 years of unconstitutional rule', Parliamentary Human Rights Group, House of Lords, 25 August 2005, http://jaddwilliam2.blogspot.co.uk/2005/08/royal-dream.html
[22] T. C. Jones, 'Time to Disband the Bahrain-based U.S. Fifth Fleet', *The Atlantic*, 10 June 2011, www.theatlantic.com/international/archive/2011/06/time-to-disband-the-bahrain-based-us-fifth-fleet/240243/
[23] C. Ryan, 'New Opportunities for Political Science: IR Theory', in *Arab Uprisings: New Opportunities for Political Science,* Project on Middle East Political Science (POMEPS Briefings), 2012, p. 56.

As a consequence, Britain was bound to provide 'security' for its 'possessions against similar aggressions directed against them by the Chiefs and tribes of this Gulf'.[24] In 1880, the British completed an agreement with the Chief of Bahrain in which they forbade the Al Khalifa from engaging in negotiations or treaties without the consent of the British.[25] This treaty was updated again in 1892.[26] In exchange for control over Bahrain's foreign policy, Britain was now obliged to protect the Bahraini government from external aggression. As such, British Imperial influence in internal affairs increased. Most importantly, it enabled Britain to assert further imperial control over the Gulf by excluding or controlling the presence of other global powers.

Since the 1800s, 'special relations' with Britain provided the regime with a vital source of legitimacy. Britain, as an external source of power warded off external threats and helped the regime suppress its internal opposition. For more than a century, but especially since the discovery of oil, British might, including military force, was ready at hand to rescue the Al Khalifa from attacks by its opponents, whether tribal, confessional or nationalist.[27] In 2013, at a reception ceremony in London hosted by the current ruler, King Hamad, highlighted the historical Al Khalifa reliance on the British, noting his father's sadness at their departure, stating: 'Why, no one asked you to go?'[28] There was no altruism here on an Imperial level. Britain's motives of what seemed to be 'wholehearted support' of the Al Khalifa was due to her 'apprehension of the geopolitical consequences of Saudi ambitions, Iranian claims and, later, as part of its region-wide actions to restrain the growth of the Arab national liberation movement'.[29] However, the Al Khalifa's reliance on external protectors has meant that they never depended wholly on the 'support, material, political or otherwise, of their subjects'.[30] Instead, 'alliances with outsiders were meant to strengthen the family's grip over internal

[24] 1861 Agreement between Shaykh Mohamed bin Khalifa, independent ruler of Bahrain, on the part of himself and successors, and captain Felix Jones, Her Majesty's Indian Navy, political resident of her Britannic majesty in the Gulf of Persia, on the part of the British Government, 1861, in P. Tuson and E. Quick (eds), *Records of Bahrain 1820–1960*, vol. 1, Slough, Archive Editions, 1993, p. 725.
[25] Translation of agreement signed by the Chief of Bahrain, dated 22 December 1880, in P. Tuson and E. Quick (eds), *Records of Bahrain 1820–1960*, vol. 1, Slough, Archive Editions, 1993, p. 409.
[26] Exclusive Agreement of the Shaykh of Bahrain with the British Government, dated 13 March 1892, in P. Tuson and E. Quick (eds), *Records of Bahrain 1820–1960*, vol. 2, Slough, Archive Editions, 1993, p. 456.
[27] Khalaf, *Contentious Politics in Bahrain.*
[28] Bahrain News Agency, 'HM King Hosts Reception Ceremony in London', 12 May 2013, www.bna.bh/portal/en/news/560364
[29] Khalaf, *Contentious Politics in Bahrain.*
[30] Khuri, *Tribe and State in Bahrain*, p. 238.

affairs while retaining its local exclusiveness'.[31] The exclusivism facilitated by this externally bolstered protection means that the Al Khalifa suffer from limited legitimacy among ethnic groups excluded from political power. This dependency on Britain, which carved out a geopolitical niche for the Al Khalifa family, has nonetheless created a state that is, without international backing, small and weak. Indeed, as Nakhleh states, places like Bahrain 'cannot be an independent actor in the international arena. Whether Bahrain wills it or not, by its very location it will be caught in the squeeze of international politics'.[32]

Bahrain's cycles of instability over the past century have rendered it an interesting political case study. Despite intermittent growth of political democracy in the early 1970s and later in the early 2000s, and the ratification of a number of international treaties such as the International Code of Civil and Political Rights (ICCPR), the recent government crackdown that began in 2011 has been more brutal than any other in history, certainly in terms of total number of deaths. Vincent Boudreau states that one 'way of thinking about state reactions to social challenges is to argue that different kinds of regimes have different repressive potentials…',[33] or repressive capacity. Davenport argues in his uses of Giddes' typology of different types of regimes that 'autocratic governments repress in different ways',[34] and that a concerted effort must be made to understand the nature of this repression and reasons for its occurrence; 'for research, the implications are clear: in the future, there must be an effort extended to disaggregate regime type so that we can understand the circumstances under which civil liberties are restricted and human rights are violated'.[35] It is therefore incorrect to treat all autocratic governments in the same manner.[36] As such 'we would not expect repression to be comparably applied across all types of autocracy'.[37] The logical implications of the above arguments are clear, and suggest that the most comprehensive understanding of repression on a state level is naturally an examination on a case-by-case basis.

Crises in Bahrain have therefore impinged upon the interests of outside powers, and thus invited significant external involvement in

[31] Ibid.
[32] E. Nakhleh, *Bahrain: Political Development in a Modernizing Society*, New York, NY, Lexington Books, 2011, p. 111.
[33] V. Boudreau, 'Precarious Regimes and Matchup Problems in the Explanation of Repressive Policy', in C. Davenport, H. Johnston and C. Mueller (eds), *Repression and Mobilization,* Minneapolis, MI, University of Minnesota Press, 2005, p. 36.
[34] C. Davenport, 'State Repression and the Tyrannical Peace', *Journal of Peace Research,* vol. 44, no. 4, 2007, p. 486.
[35] Ibid., p. 486. [36] Ibid., p. 500. [37] Ibid., p. 489.

repression. While these shifts in 'international political re-alignments'[38] have impacted upon the political status quo and opportunities available to social movements, they have also affected repressive capacity and repressive choices. After all, Bahrain's crisis of sovereignty implies an inability by the regime to have full autonomy over its actions. In this regard, regime type becomes somewhat problematic, as it applies responsibility to an entity that is very much contingent on the actions of other regime types (i.e. Britain and Saudi). In 1996, a writer in *The Economist* eloquently summed up this interference.

> For a tiny country, without even much oil to recommend it, Bahrain has an unusual number of big friends ready to rally enthusiastically to the ruling family's sides as it cracks down, yet again, on dissent. Several have their own reasons for doing so: dislike of the democracy (Saudi Arabia); eagerness to ingratiate itself with the Gulf states (Jordan); the desire to protect a useful military base (America and Britain). And most are happy to form a phalanx against Iranian meddling – if that is, indeed, what is happening.[39]

This multiple state-centric focus should also give way to factor in other actors, from private companies and entrepreneurs to new technological forms themselves. Indeed, rather than regime, the term 'assemblage' is perhaps more appropriate. Nonetheless, the question of how Britain and Saudi Arabia have demonstrated extensive interference in quashing political opposition designed to challenge the Al Khalifa has not been studied extensively.

Inevitably, the international realignments that followed Independence are important to Bahrain, whose ruling regime has sought to placate and be amenable to international players with varying ideologies and foreign policies. A regime that has summarily relied on outside forces to maintain its power does not necessarily fall neatly into any predefined category, and will never be a leading player, or ultimately determiner of its own destiny. That is not to dismiss the agency of the Bahraini government but merely to acknowledge that other forces are at work that shape, influence and often define the limits of the enactments of specific processes. While it is a truism now that international linkages have been influential in bolstering the resilience of Arab states,[40] the existence of the literature on how repression changes temporally over

[38] D. McAdam, 'Political Process and the Development of Black Insurgency 1930–1970', in V. Ruggiero and N. Montagna (eds), S*ocial Movement: A Reader*, London and New York, NY, Routledge, 2008, p. 179.
[39] *The Economist*, 'Spot the Villain', 3 February 1996, issue, 7951, p. 44.
[40] See, for example, Bellin and Heydemann.

time is small and non-existent for countries such as Bahrain.[41] If such changes do exist, they may be more discernible in a country like Bahrain that has been subject to two different spheres of influence: British and then Al Khalifa/Saudi Arabian imperial overrule, the latter coinciding with a rise of US influence in the region. Indeed, the argument is that repressive action is defined in part by the differing dual authority structures that have emerged in Bahrain, from a British Al Khalifa coalition to a Saudi Al Khalifa coalition. In this regard, exploring the 'legitimaters' of repression is essential. 'Legitimaters', according to Lopez and Stohl are 'a core group of technocrats, industrialists and, virtually always, military personnel and institutions',[42] who 'lend support to acts of state terror because they directly benefit from them or because such brutal use of state force permits the realization of goals that are highly salient to them'.[43]

Why Repression?

Bahrain presents a compelling case in itself regarding the study of repression for many reasons. It has been afflicted by internal political instability and conflict throughout its modern history. What began as the feudal oppression of the native *baḥārna* by the conquering Al Khalifa tribe and their allies has evolved into the neofeudal repression by the Al Khalifa-dominated regime (and their allies) of several uprisings spearheaded by different movements. These uprisings have had several different characteristics, from the more nationalist movements of the 1950s and 1960s and the labour and leftist movements of the 1970s to the exogenously branded 'Islamic' movements of the 1980s and 1990s. The most recent of these uprisings began in 2011, when Bahrainis, galvanized by the protests in Tunisia and Egypt in 2010, took to the streets on 14 February 2011 to demand greater political rights. In all cases, despite political reforms, or constitutional reformulations, the ruling Al Khalifa family have succeeded in preserving their monopoly on the country's material, political and military resources, highlighting what Eva Bellin

[41] For work that has sought to track methods of repression over long periods of time, see: R. J. Goldstein, *Political Repression in Modern America: From 1870 to 1976.* 1st Illinois ed. Urbana, IL, University of Illinois Press, 1978; R. J. Goldstein, *Political Repression in 19th Century Europe*, Oxford, Routledge, 2010 (first published 1983); J. Boykoff, *Beyond Bullets: The Suppression of Dissent in the United States*, Edinburgh, AK Press, 2007, p. 14.

[42] G. A. Lopez and M. Stohl, 'State Terrorism: From the Reign of Terror to Ninety-Eighty Four Terrorism', *Chitty's Law Journal*, vol. 32, no. 5, 1984–7, p. 25.

[43] Ibid.