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Suicide in the Name of Honor: Why and How U.S. Asylum Law Should be Modified to Allow Greater Acceptance of Honor- Violence Victims to Prevent “Honor Suicides”

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SUICIDE IN THE NAME OF HONOR: WHY AND HOW U.S.
ASYLUM LAW SHOULD BE MODIFIED TO ALLOW GREATER
ACCEPTANCE OF HONOR-VIOLENCE VICTIMS
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INTRODUCTION: ELIF’S STORY

For girls like eighteen-year-old Elif, the societal pressure of upholding family honor is all too real.¹ In Batman, the southeastern Turkish city where she grew up, honor killings and suicides are frequent, which has led the area to be nicknamed “Suicide City.”²

In Batman, approximately three-quarters of all suicides are committed by females, although worldwide men commit suicide

1. Ramita Navai, *Women Told: ‘You Have Dishonoured Your Family, Please Kill Yourself,’* THE INDEPENDENT (Mar. 27, 2009), <http://www.independent.co.uk/news/world/europe/women-told-you-have-dishonoured-your-family-please-kill-yourself-1655373.html>, archived at <http://perma.cc/UXL4-93VX>.

2. *Id.*

much more often than women.³ The average age for female suicides in Batman hovers around twenty-point seven, which is especially jarring in comparison to other countries worldwide where the average age for female suicides tends to be around forty-five.⁴

In Batman, the threat of honor killings and suicide affect a large percentage of the city's female population.⁵ Amnesty International estimates approximately twenty to twenty-five honor killings are committed in the Batman region per year.⁶ But the Turkish city is not alone. Honor killings are prevalent throughout the world, even in Western countries, and affect women of varying races, nationalities and cultures.⁷

Elif's first-hand experience with honor killings and honor suicides began when she refused to enter an arranged marriage with an older man because she wanted to stay in school and further pursue her education.⁸ Her family interpreted her marriage refusal and her desire to continue studying as an act of disobedience so shameful and dishonorable that it would bring dishonor and shame not only upon her, but also upon her entire family.⁹ In communities like Batman, which harbor strong beliefs that a family's honor can only be restored by killing the family member who brought the dishonor upon the family,¹⁰ her family's decision was clear: Elif had to be killed.¹¹ There was no other way to restore her family's honor and reputation, which she tarnished by her refusal to enter an arranged marriage.¹² Instead of her family members attempting to kill her themselves, Elif's family told her that she should take her own life, which would spare her family from any criminal charges.¹³ Elif was

3. *Id.*

4. *In Turkey, A Mysterious Spate of Suicides Raises Spectre of "Honor Killings,"* WORLD CRUNCH (Aug. 28, 2011), http://www.worldcrunch.com/culture-society/in-turkey-a-mysterious-spate-of-suicides-raises-spectre-of-honor-killings-/c3s3639#.UpDtz5SSu_N, archived at <http://perma.cc/7DP9-PZ7V>.

5. Mazhar Bağlı & Aysan Sever, *Female and Male Suicides in Batman, Turkey: Poverty, Social Change, Patriarchal Oppression and Gender Links*, 2 WOMEN'S HEALTH & URBAN LIFE 60, 69 (2003).

6. *Id.* at 66.

7. Ferris K. Nesheiwat, *Honor Crimes in Jordan: Their Treatment Under Islamic and Jordanian Criminal Laws*, 23 PENN ST. INT'L L. REV. 251, 256-57 (2004).

8. Navai, *supra* note 1.

9. *Id.*

10. Carin Benninger-Budel & Lucinda O'Hanlon, World Organisation Against Torture (OMCT), *Violence Against Women in Turkey: A Report to the Committee Against Torture*, in VIOLENCE AGAINST WOMEN: 10 REPORTS/YEAR 2003 339, 352 (2004), available at http://www.omct.org/files/2004/07/2409/vaw_reports2003_eng.pdf, archived at <http://perma.cc/C7PQ-XE4Q>.

11. Navai, *supra* note 1.

12. *Id.*

13. *Id.*

not the only girl she knew who was threatened with honor killings in her community.¹⁴ In fact, several girls she knew from school were killed by their families, sometimes for something as innocuous as receiving a text message from a boy,¹⁵ or having a song dedicated to them on the radio.¹⁶ Knowing how serious and real this threat from her father was, and how likely he was to follow through with it, Elif knew she had to escape.¹⁷

Elif refused to go through with the honor suicide, and instead ran away from Batman to hide from her family members.¹⁸ She found refuge in several women's shelters in the countryside, but her male family members continued to try to find and kill her.¹⁹ Once, the shelter where Elif was staying was even attacked and broken into by family members, who were desperate to capture her and kill her, which was the only way to restore her family's honor in their minds.²⁰

For women like Elif, who live in societies where women are freely and openly threatened with honor killings by family members, there are often very few options available to women as a means to escape the violence. Women threatened with honor violence are often very isolated within their communities, and cannot seek refuge with other family members or friends due to the community and extended family's role in propagating the violence.²¹ Women often also cannot contact the local police for help or assistance because the police will likely send the women back to their families, due to the close-knit nature of these communities and the commonplace acceptance of honor-related violence in greater society.²²

Women like Elif may attempt to run away from their hometowns and seek safety in women's shelters.²³ As in Elif's story, however, many of these shelters are not safe or secure facilities, and often are the first places family members search for women accused

14. *Id.*

15. *Id.*

16. Hillary Mayell, *Thousands of Women Killed for Family "Honor,"* NAT'L GEOGRAPHIC (Feb. 12, 2012), http://news.nationalgeographic.com/news/2002/02/0212_020212_honor_killing.html, archived at <http://perma.cc/C53J-VXPT> (describing how in Turkey, a family slit a female relative's throat in the town's public square because a young, unrelated man had dedicated a love ballad to her on the local radio).

17. Navai, *supra* note 1.

18. *Id.*

19. *Id.*

20. *Id.*

21. *Extra: Helping Victims of Honor-Based Violence*, CBS NEWS (Apr. 4, 2012), <http://www.cbsnews.com/videos/extra-helping-victims-of-honor-based-violence/>, archived at <http://perma.cc/K72E-WGQH>.

22. STACY L. MALLICOAT, *WOMEN AND CRIME: A TEXT/READER* 240 (2012).

23. *Id.*

of honor crimes after they go missing.²⁴ For other victims, escaping the violence may simply not be possible. For example, in many traditional societies, women are not permitted to leave their homes without a male relative to serve as a guardian or escort.²⁵ This of course limits the woman's ability to escape, because a male family member must constantly supervise her. In other situations, women may not have any personal money or access to any other sorts of funds.²⁶ This also severely restricts their ability to escape and seek shelter, because it means they have no means of paying for transportation to use to get to a safe location. For women in such dire situations, there may seem like no way to evade the violence and escape the threats made against them. As a result, these women may feel as if there is no way for them to escape and that honor suicide is the only way for them to end their suffering and to become at peace with their families, who refuse to forgive them until their family name has been cleansed.²⁷

For women threatened with honor-related violence, especially those who have very limited resources, asylum should be an accessible option to allow them to escape violent situations that place their lives in danger. Under the current asylum application system in the United States, female applicants threatened with honor violence are likely to have difficulties meeting the standards set forth to process asylum applications.²⁸ First, many women faced with honor-related violence will not fall within the definition of refugee described in both U.S. and international law.²⁹ Further, many women faced with honor-related violence will not be able to meet the evidentiary standards needed to satisfy the application's burden of proof due to their lack of resources and support.³⁰ As a result, these women are unlikely to be granted asylum and will instead have to remain in their home countries, despite an ongoing threat of violence.

Despite the tremendous number of women who seek asylum, experts agree that female refugees suffer worse than male refugees,

24. Navai, *supra* note 1.

25. *Saudi Arabia: Male Guardianship Policies Harm Women*, HUMAN RIGHTS WATCH (Apr. 21, 2008), <http://www.hrw.org/news/2008/04/20/saudi-arabia-male-guardianship-policies-harm-women>, archived at <http://perma.cc/D9E3-NR99>.

26. *Id.*

27. MALLICOAT, *supra* note 22, at 238.

28. T.S. Twibell, *The Development of Gender as a Basis for Asylum in United States Immigration Law and Under the United Nations Refugee Convention: Case Studies of Female Asylum Seekers from Cameroon, Eritrea, Iraq and Somalia*, 24 GEO. IMMIGR. L.J. 189, 193–94 (2010).

29. Ilona Bray, *Asylum or Refugee Status: Who is Eligible?*, NOLO: LAW FOR ALL, <http://www.nolo.com/legal-encyclopedia/asylum-or-refugee-status-who-32298.html>, archived at <http://perma.cc/83BF-9YQ8> (last visited Nov. 4, 2014).

30. MALLICOAT, *supra* note 22, at 239–40.

and that female applicants are much more restricted when seeking asylum.³¹ According to the United Nations High Commissioner for Refugees (UNHCR), approximately seventy-five to eighty percent of the fifty million refugees and persons uprooted within their own home countries around the world are women and children.³² Of the 21.8 eight million refugees that UNHCR is responsible for, approximately half are women.³³ Similar to women faced with gender-related violence, these women are often forced to become refugees solely because of their gender and status as women.³⁴

The U.S. asylum application process should be modified to better accommodate women who are faced with honor violence, and to allow them to find refuge in the United States and avoid being trapped in communities and societies where their only remaining option is to succumb to societal pressure and go through with honor suicides. Such changes would not only benefit women seeking asylum, but also society as a whole. For this reason, the U.S. has important policy incentives to create a new avenue through which women can successfully and safely escape honor-related gender violence. Creating such new policies will not only save numerous women's lives, but it will also achieve an important policy goal by sending a clear signal to the national governments of offenders that the international community does not tolerate honor-related violence and gender-related violence, and that it will be prevented at all costs.

I. BACKGROUND OF HONOR KILLINGS

A. *What Is an Honor Killing?*

Honor killings are murders typically committed by male family members against female relatives in order to restore the man's or family's honor after the woman committed some action perceived to have tarnished it.³⁵ Honor killings are rooted in the belief that women are the property of male family members, and that women are the symbols of family honor.³⁶ The perceived dishonor is usually a result of violating a sexual or sociocultural norm of the society or community in which the woman lives.³⁷ Examples of actions that are often

31. Twibell, *supra* note 28.

32. *Id.* at 194.

33. *Id.*

34. *Id.*

35. *Culture of Discrimination: A Fact Sheet on "Honor" Killings*, AMNESTY INT'L USA, <http://www.amnestyusa.org/stopviolence/factsheets/violence.html>, archived at <http://perma.cc/AJG5-9A9V> (last visited Nov. 4, 2014) [hereinafter AMNESTY INT'L USA].

36. *Id.*

37. See discussion, *infra* Part I.A.

considered to bring “dishonor” upon a family include a female family member engaging in premarital sex,³⁸ a female family member having an extramarital affair,³⁹ a female relative being in a relationship with a man her family members do not approve of,⁴⁰ or even a female relative being a victim of rape.⁴¹ In many cases, however, the “dishonorable act” is something much more innocuous. There have been reports of women being victims of honor killings for receiving text messages from men outside of the family,⁴² wearing Western clothing,⁴³ Facebook-chatting with a man outside the family,⁴⁴ failing to serve a male family member a meal quickly enough,⁴⁵ or even a husband simply having a dream that his wife committed adultery (whereas in actuality, she did not commit adultery).⁴⁶ In cultures where honor killings are prevalent, once a man’s honor has been damaged, his honor may only be restored by killing the female family member who tarnished it.⁴⁷ “Washing away the shame” or the “bad conduct of the victim” is often cited as the motivation for the killing in the majority of cases.⁴⁸ The victim’s male relatives, who feel they are restoring the family’s honor by killing the woman who besmirched their honor, commit the majority of honor killings.⁴⁹ Typically, the most common perpetrators are the victim’s youngest brothers, who are often in their early twenties.⁵⁰ However, sometimes families call

38. The Week Staff, *Pakistan’s Escalating ‘Honor Killing’ Problem*, THE WEEK (Mar. 23, 2012), <http://theweek.com/article/index/225998/pakistans-escalating-honor-killing-problem>, archived at <http://perma.cc/QTF3-H3L2>.

39. *Id.*

40. Mazna Hussain, Note, “*Take My Riches, Give Me Justice*”: A Contextual Analysis of Pakistan’s Honor Crimes Legislation, 29 HARV. J.L. & GENDER 223, 228 (2006).

41. Pascale Harter, *Libya Rape Victims Face ‘Honour Killings’*, BBC NEWS (June 14, 2011), <http://www.bbc.co.uk/news/world-africa-13760895>, archived at <http://perma.cc/M836-CR7M>.

42. Navai, *supra* note 1.

43. Andrea Vogt, *Honour Killing: Afghan Family Drowned Three Teenage Sisters*, THE WEEK (Jan. 30, 2012), <http://www.theweek.co.uk/world-news/honour-attacks/44816/honour-killing-afghan-family-drowned-three-teenage-sisters>, archived at <http://perma.cc/L3ZA-8XPM>.

44. Damien McElroy, *Saudi Woman Killed for Chatting on Facebook*, THE TELEGRAPH (Mar. 31, 2008), <http://www.telegraph.co.uk/news/worldnews/1583420/Saudi-woman-killed-for-chatting-on-Facebook.html>, archived at <http://perma.cc/B9NC-M5XR>.

45. Mayell, *supra* note 16.

46. AMNESTY INT’L USA, *supra* note 35.

47. Benninger-Budel & O’Hanlon, *supra* note 10, at 352.

48. ‘HONOUR’: CRIMES, PARADIGMS, AND VIOLENCE AGAINST WOMEN 128 (Lynn Welchman et al. eds., 2005) (discussing the results of a case study, where seventy-eight percent of perpetrators claimed “washing away the shame” or “bad conduct of the victim” was the motivation behind the killing).

49. Christina A. Madek, Note, *Killing Dishonor: Effective Eradication of Honor Killing*, 29 SUFFOLK TRANSNAT’L L. REV. 53, 55 (2005).

50. ‘HONOUR’: CRIMES, PARADIGMS, AND VIOLENCE AGAINST WOMEN, *supra* note 48, at 184–85.

upon even younger male family members to commit the murder, because many countries prosecute minors much more leniently than adults for honor crimes.⁵¹

B. Where Do Honor Killings Occur?

While honor killings are typically associated with the Middle East, honor killings are also prevalent in many different countries with varying religious and cultural backgrounds.⁵² Honor killings are often more concentrated in Middle Eastern countries, however, they have been reported in countries such as Bangladesh, Great Britain, Brazil, Ecuador, Egypt, India, Israel, Italy, Jordan, Pakistan, Turkey, the United States and Uganda, according to a report by the United Nations Commission on Human Rights.⁵³

C. Legal Views of Honor Killing Throughout the International Community

Legal views of honor killings and honor suicides vary drastically across the international community. Many countries no longer legally allow a husband to kill his wife because of adultery or for other reasons that are typical of honor killings (although adultery is a crime that continues to be punishable by death in some countries).⁵⁴ In other countries, honor killings fall into a category of “crime[s] of passion.”⁵⁵ In those countries, the defendant is considered to be “blinded by rage,” or otherwise provoked by the victim, which often means that defendants will receive significantly lower sentences due to mitigating circumstances.⁵⁶

In response to the large increase in the number of honor killings, several Middle Eastern countries have modified their criminal and

51. Mayell, *supra* note 16.

52. Nesheiwat, *supra* note 7, at 257.

53. Expert Group Meeting on Good Practices in Legislation to Address Harmful Practices Against Women, May 25–28, 2009, *Harmful Traditional Practices in Europe: Judicial Interventions*, U.N. Doc. EGM/GPLHP/2009/EP.12 (May 21, 2009) (prepared by Carole Ageng'o), available at http://www.un.org/womenwatch/daw/egm/vaw_legislation_2009/Expert%20Paper%20EGMGPLHP%20_Carole%20Ageng'o%20revised_.pdf, archived at <http://perma.cc/479A-BX7M>.

54. MALLICOAT, *supra* note 22, at 239–40; Vogt, *supra* note 43; Elizabeth Peiffer, *Special Collection: Seminar Papers on Women and Islamic Law: The Death Penalty in Traditional Islamic Law and As Interpreted in Saudi Arabia and Nigeria*, 11 WM. & MARY J. WOMEN & L. 507, 509–10, 519–21 (2005) (explaining that Saudi Arabia follows the Hanbali school of Islamic law, which mandates that female defendants should first be flogged, and then stoned to death after being found guilty of committing adultery).

55. John Alan Cohan, *Honor Killings and the Cultural Defense*, 40 CAL. W. INT'L L.J. 177, 202 (2010).

56. *Id.*

penal codes to better accommodate punishments for honor killings. For example, in 2009 Syria amended Article 548 of its national code, which previously waived any punishment for a male who committed an honor killing against a female family member for inappropriate sexual behavior.⁵⁷ Syria's new law, however, has come under attack due to a provision stating that a judge may choose to reduce the punishment for a killing if the killing was done with "honorable intent."⁵⁸

Jordan also has modified its penal codes to punish those who perpetrate honor killings. In Jordan, Article 340 of the penal code previously stated that: "[h]e who discovers his wife, or one of his female relatives, committing adultery with somebody and kills, wounds, or injures one or both of them, shall be exempted from any penalty."⁵⁹ However, the penal code was modified and now states: "He who commits a crime in a fit of fury resulting from a wrongful and dangerous act on the part of the victim shall benefit from a reduced penalty."⁶⁰ In 2009, Jordan even established a special court, which will be used for prosecuting honor crimes.⁶¹ In Jordan, however, the change in law may not signal as great a change in popular opinion as in Turkey. Reports suggest that despite the new provisions in Jordanian law to punish honor killings, the majority of Jordan's teenage population still believe that honor killings are justified and should not be punished under law.⁶²

In Egypt, similar changes have been implemented.⁶³ Although Egyptian law condemns honor killings, Article 17 of the Egyptian Penal Code permits judges to use their discretion in determining the punishments for those convicted of honor killings.⁶⁴ In some cases, judges have imposed sentences of only six months prison time for

57. *Syria: No Exceptions for 'Honor Killings'*, HUMAN RIGHTS WATCH (July 28, 2009), <http://www.hrw.org/news/2009/07/28/syria-no-exceptions-honor-killings>, archived at <http://perma.cc/B87U-BEJN>.

58. *Id.*

59. CATHARINE A. MACKINNON, *ARE WOMEN HUMAN? AND OTHER INTERNATIONAL DIALOGUES* 296 (1st ed. 2007).

60. *Id.*

61. *Belief that Honour Killings Are 'Justified' Still Prevalent Among Jordan's Next Generation, Study Shows*, UNIV. OF CAMBRIDGE (June 20, 2013), <http://www.cam.ac.uk/research/news/belief-that-honour-killings-are-justified-still-prevalent-among-jordans-next-generation-study-shows>, archived at <http://perma.cc/8WU9-5ARY> (explaining that fifty percent of boys and twenty percent of girls believe that killing a daughter, sister or wife who has brought dishonor upon the family is justified. A third of the teenagers asked in the survey were advocates of honor killings and crimes).

62. *Id.*

63. Fatma Khafagy, *Honor Killing in Egypt*, U.N. DIV. FOR THE ADVANCEMENT OF WOMEN, 7-8 (2005), <http://www.un.org/womenwatch/daw/egm/vaw-gp-2005/docs/experts/khafagy.honorcrimes.pdf>, archived at <http://perma.cc/N6T9-EFP9>.

64. *Id.* at 4.

honor killing perpetrators, which can be served during the duration of the trial.⁶⁵ This, of course, means that the perpetrator is allowed to walk free after the honor killing trial is concluded.⁶⁶

Other countries, such as Turkey, have been more successful in implementing new laws that aim to punish the perpetrators of honor-related crimes.⁶⁷ In the mid-2000s, Turkey dramatically revised its penal code and added new provisions imposing life sentences on murders committed in the name of honor.⁶⁸ Due to the fact that families often forced younger male family members to commit the honor killings—because minors were less likely to receive hefty sentences—Turkey’s new penal code also included a provision that states that minors who commit honor killings will be tried as adults and receive the same sentence as a perpetrator who was within the age of majority when the crime was committed.⁶⁹ Turkish courts have begun implementing these new laws, and there have been multiple examples of courts punishing honor killing perpetrators, and those who encouraged the killing, with life sentences.⁷⁰

D. Success of Prosecuting Honor Killing Cases

Although some Middle Eastern countries have amended their penal codes to accommodate for honor killings and other incidents of honor violence, honor killings are rarely prosecuted.⁷¹ In these countries, honor killings are often not prosecuted for several reasons. One reason that these crimes are not prosecuted is because there is often public societal support for committing such crimes.⁷²

65. *Id.*

66. *Id.*

67. Dan Bilefsky, ‘*Virgin Suicides’ Save Turks’ Honor*, N.Y. TIMES (July 12, 2006), http://www.nytimes.com/2006/07/12/world/europe/12iht-virgins.2184928.html?pagewanted=all&_r=0, archived at <http://perma.cc/36W-PTVD> [hereinafter Bilefsky, *Virgin Suicides*].

68. *Id.*

69. *Id.*

70. *Daughter Pregnant by Rape, Killed by Family*, BRISBANE TIMES (Jan. 13, 2009), <http://www.brisbanetimes.com.au/articles/2009/01/13/1231608651606.html>, archived at <http://perma.cc/YU9N-NK7R> (describing how a Turkish court sentenced five members of the same family—the brother, mother, father and two uncles—to life imprisonment after murdering Naile Erdas, a sixteen-year-old who was impregnated after being raped in Diyarbakir, Turkey).

71. Rachel A. Ruane, Comment, *Murder in the Name of Honor: Violence Against Women in Jordan and Pakistan*, 14 EMORY INT’L L. REV. 1523, 1534, 1550–52 (2000) (explaining how in Pakistan, honor killings are rarely investigated and prosecuted with the exception of high profile cases, and that in Jordan, it is typical for the murderer to go to the police to alert them about the crime, possibly because of lack of legal repercussions).

72. *Case Study: “Honour” Killings and Blood Feuds*, GENDERCIDE WATCH (Jan. 20, 2008), http://www.gendercide.org/case_honour.html, archived at <http://perma.cc/HB82-8GEC> (describing how approximately one hundred villagers were cheering, chanting

If society and, by proxy, the government, supports these crimes being committed and will not seek to enforce the country's legal code prohibiting such crimes, there are no parties who would be able to bring the lawsuit.⁷³ If the government is not willing to press charges against the perpetrators, it is unlikely that any other party would. This is especially true because most often it is the woman's family who is involved in planning and completing the honor killing.⁷⁴ Further, it is likely that any other party would lack sufficient standing to bring a lawsuit on behalf of the victim.⁷⁵

II. BACKGROUND OF HONOR SUICIDE

A. *What is Honor Suicide?*

In some countries, the practice of honor suicide has developed as a way to allow families to avoid killing their dishonored female family members, and instead persuade the woman to kill herself because of the dishonor she has placed upon her family.⁷⁶ In recent years, the rate of honor suicides in Turkey has been steadily increasing.⁷⁷ In one Turkish city alone, officials estimate there were as many as 165 honor suicide attempts within six years.⁷⁸

B. *Why Did Honor Suicide Develop?*

Some attribute the increase in honor suicides to new laws that introduce mandatory life sentences for the perpetrators of honor killings.⁷⁹ Previously, honor killers could receive reduced sentences by arguing that the female victims provoked their attacks,⁸⁰ and in

and dancing in the street as a brother publicly stabbed his sister after she married a man he did not approve of).

73. *The Role of Community in Combating Honor Killings*, STANFORD UNIV., http://www.stanford.edu/group/womenscourage/communitybasedsolutions/the_role_of_community_in_combating_honor_killings.html, archived at <http://perma.cc/U7VL-6H5W> (last visited Nov. 4, 2014) (explaining how there is often strong community support behind honor killings).

74. Bilefsky, *Virgin Suicides*, *supra* note 67.

75. Although it is unclear whether the idea of standing exists in other legal systems where honor killings may be tried, it is likely that there is some sort of determination made regarding who may bring a lawsuit on behalf of a harm suffered to another party.

76. Dan Bilefsky, *How to Avoid Honor Killing in Turkey? Honor Suicide*, N.Y. TIMES (July 16, 2006), http://www.nytimes.com/2006/07/16/world/europe/16turkey.html?pagewanted=all&_r=0, archived at <http://perma.cc/VDF2-W3VK> [hereinafter Bilefsky, *Honor Killing*].

77. *Id.*

78. *Id.*

79. Navai, *supra* note 1.

80. *Id.*

some countries like Syria, would have their sentences completely abandoned by arguing that the women provoked the attacks.⁸¹ Now, however, this is less likely to be the case. As a result, families will often coerce the dishonorable female in their family to commit honor suicide, which would prevent any family members from being criminally charged.⁸²

In some cases, families have locked women alone in rooms with poison, ropes or a gun in order to urge them to go through with the honor suicide.⁸³ This has become especially prevalent in Turkey, after the country began increasing its sentences for honor killings once beginning membership and accession talks with the European Union.⁸⁴

In many Western countries, where honor killings tend to be less frequent, the local legal systems are grappling with creating new policies and laws to curb honor-related crimes.⁸⁵ Until recently, many Western courts considered culture a mitigating factor in honor killings, although this practice has now largely been abandoned.⁸⁶ In the United States, there is a particular struggle regarding creating an “honor killing” classification, due to fear that this new categorization may create a category of crime that will be seen as targeting a particular culture or religion.⁸⁷ In particular, officials are afraid that creating such a categorization will fuel a bias against Arab or Muslim Americans, which has become more problematic after the September 11 terrorist attack.⁸⁸ Additionally, United States laws have failed to address the issue of honor killings because of a lack of domestic data about the number of honor killings that have taken place in the country.⁸⁹ Without having concrete numbers demonstrating that honor killings are in fact an issue in the United States, legislators and law enforcement officials are hesitant to enact new policies and laws to combat honor killings within the States.⁹⁰ United States courts are also hesitant to use the term “honor killing” in a trial, even when many of the elements suggestive of an honor killing

81. *Syria: No Exceptions for ‘Honor Killings,’ supra* note 57.

82. Bilefsky, *Honor Killings, supra* note 76.

83. Navai, *supra* note 1.

84. Rebecca E. Boon, Note, *They Killed Her For Going Out With Boys: Honor Killings in Turkey in Light of Turkey’s Accession to the European Union and Lessons for Iraq*, 35 HOFSTRA L. REV. 815, 823–26 (2006).

85. Nicole Pope, *How the West Should Treat ‘Honor’ Killings*, REUTERS (Feb. 3, 2012), <http://blogs.reuters.com/great-debate/2012/02/03/how-the-west-should-treat-honor-killings/>, archived at <http://perma.cc/MFP-2SKU>.

86. *Id.*

87. Julia Dahl, “Honor Killing” Under Growing Scrutiny in the U.S., CBS NEWS (Apr. 5, 2012), <http://www.cbsnews.com/news/honor-killing-under-growing-scrutiny-in-the-us/>, archived at <http://perma.cc/WDG6-R3BX>.

88. *Id.*

89. *Id.*

90. *Id.*

are present.⁹¹ For example, prosecutors in a California murder case tried the case under a murder theory because, simply, “honor killings . . . are uncharted territory in California” and the court was unable to evaluate an honor killing case due to lack of legal precedent.⁹²

III. DEVELOPMENT OF MODERN ASYLUM LAW

Modern asylum law developed after World War II, when many Europeans were uprooted and left homeless after the war.⁹³ The United Nations was determined to assist the people of Europe, and created the Convention and Protocol Relating to the Status of Refugees of 1951.⁹⁴ The Convention created the definition of a refugee, and established the idea of non-*refoulement*, which ensures that people who fall within the category of refugee will not be sent back to their home countries.⁹⁵ Although many European countries chose to ratify and become parties to the 1951 Convention, the United States chose not to participate.⁹⁶

In 1967, the United Nations modified the 1951 Convention and adopted a new Protocol Relating to the Status of Refugees in order to address new refugee issues stemming from the Cold War.⁹⁷ The new Protocol modified the terms of the 1951 Convention, which were originally drafted to apply only to European refugees from World War II.⁹⁸ After the Protocol was modified in 1967, the United States became a party to the Convention, and then enacted the Convention into domestic law as the Refugee Act of 1980.⁹⁹ The Refugee Act of 1980 replaced the Immigration and Nationality Act and codified United States asylum law to the standards set by the United Nations and the international community.¹⁰⁰

91. Paul Kujawsky, *San Bernardino DA Declines to Prosecute Wahid Murder as “Honor Killing,”* EXAMINER (June 8, 2012), <http://www.examiner.com/article/san-bernardino-da-declines-to-prosecute-wahid-murder-as-honor-killing>, archived at <http://perma.cc/34SC-K5AH> (describing a California murder trial, in which the court decided not to classify a murder case as an honor killing, although there were several elements in the case typical of honor killings).

92. *Id.*

93. Susanne J. Prochazka, Note, *There is No Honor in Honor Killings: Why Women at Risk for Defying Sociosexual Norms Must Be Considered a “Particular Social Group” Under Asylum Law*, 34 T. JEFFERSON L. REV. 445, 452 (2012).

94. *Id.* at 452.

95. *Id.* at 452–53.

96. *Id.* at 453.

97. *Id.*

98. *Id.*

99. Prochazka, *supra* note 93, at 453–54.

100. *Id.* at 454.

IV. PROCESSING ASYLUM APPLICATIONS BASED ON HONOR VIOLENCE

For a female applying for asylum based on threats of honor killing, the first step is to arrive in the United States as an alien and officially apply for asylum.¹⁰¹ The applicant has one calendar year to submit her asylum application.¹⁰² To be eligible for asylum, the applicant must prove that she is a refugee under the definition within the Immigration and Nationality Act.¹⁰³ The Act, which is based upon the international definition of a refugee in the 1951 United Nations Convention Related to the Status of Refugees,¹⁰⁴ defines a refugee as:

[A]ny person who is outside any country of such person's nationality or, in the case of a person having no nationality, is outside any country in which such person last habitually resided, and who is unable or unwilling to return to, and is unable or unwilling to avail himself or herself of the protection of, that country because of persecution or a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion. . . .¹⁰⁵

Each applicant has the burden of proof to establish she is a refugee within the meaning of the Act,¹⁰⁶ and that she falls within one of the established categories: past persecution on account of a protected ground (race, religion, nationality, membership in a particular social group, or political opinion) or she has a “well-founded fear” of persecution due to one of the protected grounds listed above.¹⁰⁷ The applicant's burden of proof also requires her to satisfy both the burden of evidence and the burden of persuading the finder of fact.¹⁰⁸

Women seeking asylum due to honor-related violence are most likely to seek asylum by arguing they are a member of a particular

101. *Id.* at 454–55.

102. *Id.* at 455.

103. *Id.*

104. Jillian Blake, Commentary, *Welcoming Women: Recent Changes in U.S. Asylum Law*, 108 MICH. L. REV. FIRST IMPRESSIONS 71, 72 (2010), <http://www.michiganlawreview.org/assets/fi/108/blake.pdf>, archived at <http://perma.cc/PR2T-HLGZ>.

105. I.N.A. § 101(a)(42)(A) (2013), 8 U.S.C. § 1101(a)(42)(A) (2012).

106. 8 C.F.R. § 208.13(a) (2014).

107. Prochazka, *supra* note 93, at 455.

108. Karen Musalo, *Irreconcilable Differences? Divorcing Refugee Protections from Human Rights Norms*, 15 MICH. J. INT'L L. 1179, 1200 (1994).

social group.¹⁰⁹ According to the United Nations High Commission for Refugees, the definition of a “particular social group” is:

[A] group of persons who share a common characteristic other than their risk of being persecuted, or who are perceived as a group by society. The characteristic will often be one which is innate, unchangeable, or which is otherwise fundamental to identity, conscience or the exercise of one’s human rights.¹¹⁰

Under this definition, asylum applicants must prove both that they possess an immutable characteristic and that this immutable characteristic causes the applicant, along with other similarly suited women, to form a particular social group.¹¹¹ This categorization is very amorphous, and courts are allowed a great degree of discretion in deciding how to construe this term.¹¹² Due to the flexibility of the categorization, many courts have differing, and sometimes conflicting, views of what group membership means, which has made it even more difficult for applicants to understand how to satisfy this condition.¹¹³ In particular, many female applicants applying for asylum to escape honor killings have struggled to establish membership in a particular social group in their asylum applications, and therefore, have not been granted asylum.¹¹⁴

Immigration judges conduct asylum proceedings and decide whether the asylum application should be accepted.¹¹⁵ If the applicant’s asylum application is accepted, she is entitled to remain in the United States indefinitely if she chooses.¹¹⁶ If an applicant’s application is rejected, she has thirty days to file an administrative appeal, which will reexamine her application.¹¹⁷ The Board of Immigration

109. Blake, *supra* note 104, at 72.

110. U.N. HIGH COMM’N FOR REFUGEES, *Guidelines on International Protection: “Membership of a Particular Social Group” Within the Context of Article 1A(2) of the 1951 Convention and/or its 1967 Protocol Relating to the Status of Refugees*, ¶ 11, HCR/GIP/02/02 (May 7, 2002), <http://www.unhcr.org/3d58de2da.html>, archived at <http://perma.cc/TJ6U-S79R>.

111. Blake, *supra* note 104, at 72.

112. Prochazka, *supra* note 93, at 448–50.

113. *Id.*

114. *Id.*

115. 8 U.S.C. § 1229a(a)(1) (2012) (“An immigration judge shall conduct proceedings for deciding the inadmissibility or deportability of an alien.”).

116. I.N.A. § 208(c)(1)(A) (2013), 8 U.S.C. § 1158(c)(1)(A) (2012). A successful asylum applicant’s right to remain in the United States may, however, be revoked in several cases, such as cases where the applicant no longer faces persecution, is charged and convicted of a serious crime, or acquires a new nationality in a country that would provide the applicant adequate protection from persecution. I.N.A. § 208(c)(2) (2013), 8 U.S.C. § 1158(c)(2) (2012).

117. I.N.A. § 208(d)(5)(A)(iv) (2013), 8 U.S.C. § 1158(d)(5)(A)(iv) (2012).

Appeals is the body that will hear her appeal, and its decision is binding on all immigration courts and judges nationwide, unless the Attorney General or a federal court overrules the appeal.¹¹⁸ If the applicant is still dissatisfied with the outcome of her appeal, she may file for a petition of review of the decision by the Board of Immigration Appeals in the appropriate federal circuit court.¹¹⁹

Applicants may also apply for asylum at a United States Border or Entry Point.¹²⁰ If an applicant has a valid U.S. visa or American entry documents, then she will likely be able to enter the U.S. and can begin the asylum application process at a later date.¹²¹ Asylum applicants have one year from their date of entry into the United States to complete their asylum applications.¹²²

The asylum process is slightly different for applicants who do not have the necessary visas or entry documents to enter the country.¹²³ First, upon reaching a U.S. Border or entry point, the prospective applicant must tell U.S. Customs and Border Protection officials that they would like to apply for asylum and explain their reasons for seeking asylum.¹²⁴ If the officials accept their explanation, the prospective asylum applicant will be taken to a detention center until a U.S. Citizenship and Immigration Services officer can hear their case and determine if they have a “credible fear” of being sent to their home country.¹²⁵ The hearing usually takes place within several days of entering the detention facility.¹²⁶ The U.S. Citizenship and Immigration officer is not responsible for determining the final outcome of the applicant’s case.¹²⁷ Instead, the Citizenship and Immigration officer will simply determine whether the applicant’s case should be heard by a judge for further evaluation.¹²⁸ However, an officer has the power to deny an applicant’s application and send them back to their home country if they believe that the applicant

118. *Board of Immigration Appeals*, U.S. DEP’T OF JUSTICE, <http://www.justice.gov/eoir/biainfo.htm>, archived at <http://perma.cc/UV9Q-D4JA> (last visited Nov. 4, 2014).

119. *Fact Sheet: BIA Restructuring and Streamlining Procedures*, U.S. DEP’T OF JUSTICE, EXEC. OFFICE FOR IMMIGRATION REVIEW, (Mar. 9, 2006), <http://www.justice.gov/eoir/press/06/BIASstreamliningFactSheet030906.htm>, archived at <http://perma.cc/S9YM-RDGU>.

120. *Asylum or Refugee Status: How to Apply*, NOLO: LAW FOR ALL, <http://www.nolo.com/legal-encyclopedia/asylum-or-refugee-status-how-32299.html>, archived at <http://perma.cc/YYN4-7AQG> (last visited Nov. 4, 2014).

121. *Id.*

122. *Id.*

123. *Id.*

124. *Id.*

125. *Id.*

126. *Asylum or Refugee Status: How to Apply*, *supra* note 120.

127. *Id.*

128. *Id.*

does not have a credible fear of persecution in their home country.¹²⁹ If the officer determines that a judge should hear an applicant's case for further evaluation, the applicant will have seven days to secure an attorney and begin preparing for their hearing before an immigration judge.¹³⁰

The immigration judge will review the applicant's case to determine if there is a real threat of persecution if the applicant were returned to their home country.¹³¹ To support their claims, applicants are urged to provide documents to serve as proof that they would be persecuted in their home countries.¹³² Personal documents, such as newspaper articles, group membership cards or medical records, are especially helpful in proving persecution, but they are not necessary to make a convincing case.¹³³ For example, some applicants have used government-prepared reports, such as the U.S. Department of State's annual Human Rights report as evidence to support statements made by the applicant in court or in an affidavit.¹³⁴

V. APPLYING FOR ASYLUM

To apply for refugee status, an applicant must go to either a U.S. Embassy or Consulate, or an office of the United Nations High Commissioner for Refugees.¹³⁵ At these locations, interested refugee applicants will receive help completing the necessary forms and will be interviewed by a U.S. Citizenship and Immigration Services officer who will decide whether the applicant is an appropriate refugee candidate.¹³⁶ Applying for refugee status is free.¹³⁷ If applicants are approved for refugee status, they will receive a physical examination, a cultural orientation, and assistance planning their trip to the U.S., including loans for their travel expenses.¹³⁸ Once applicants reach the United States, if they desire to continue living in the

129. *Id.*

130. *Id.*

131. *Id.*

132. *Asylum or Refugee Status: How to Apply*, *supra* note 120.

133. *Id.*

134. Dagmar R. Myslinska, *Chances of Winning a Grant of Asylum*, NOLO: LAW FOR ALL, <http://www.nolo.com/legal-encyclopedia/chances-winning-grant-asylum.html>, archived at <http://perma.cc/A5N9-Q375> (last visited Nov. 4, 2014).

135. *Asylum or Refugee Status: How to Apply*, *supra* note 120.

136. *Refugees*, DEP'T OF HOMELAND SEC., U.S. CITIZEN AND IMMIGRATION SERVS., <http://www.uscis.gov/humanitarian/refugees-asylum/refugees>, archived at <http://perma.cc/7TNC-FMZT> (last visited Nov. 4, 2014).

137. *Id.*

138. *Id.*

country, they must apply for a green card one year from the date of their arrival in the U.S.¹³⁹

Although the refugee status application process was designed to be deferential toward refugees, there are significant obstacles associated with the process that would negatively affect women threatened with honor violence. First, although a woman may want to apply for refugee status, she may have difficulties getting herself to either a U.S. Embassy, Consulate, or an office of the United Nations High Commissioner of Refugees.¹⁴⁰ As many of the women threatened with honor-related violence live in rural or otherwise isolated communities, traveling to one of these locations may be prohibitively difficult or prohibitively expensive.¹⁴¹ Further, many women who are threatened with honor-related violence have limited mobility, and may not be able to leave their homes without the supervision of a male guardian or chaperone.¹⁴² Therefore, even if a woman had the funds to provide for the necessary transportation to an embassy or United Nations office, she may put herself in even greater danger by defying her male family members one more time by “dishonoring” their authority again.

VI. RECENT DEVELOPMENTS IN U.S. ASYLUM LAW

During the Obama Administration, several landmark changes have been made to asylum law to help ease the process for women threatened with gendered-violence.¹⁴³

In 2009, the Department of Homeland Security submitted a brief to the Board of Immigration Appeals, which was the first to argue that battered women should be categorized as refugees within the “particular social group” category.¹⁴⁴ In that brief, the Department of Homeland Security said that a woman faced with domestic violence may argue that they are members of a particular social group, and that the violence directed toward this particular woman was due to her membership in this group.¹⁴⁵ Specifically, the Department argued that the particular social group classification may be constructed in a way that takes into consideration the way the abuser and the greater society perceive the abuse taking place, an approach

139. *Id.*

140. *Saudi Arabia: Male Guardianship Policies Harm Women*, *supra* note 25.

141. Ruane, *supra* note 71, at 1527–28.

142. *Saudi Arabia: Male Guardianship Policies Harm Women*, *supra* note 25.

143. Blake, *supra* note 104, at 71.

144. *Id.* at 73.

145. *Id.*

that is more likely to be successful in pursuing an asylum claim.¹⁴⁶ In making this classification, it is also important to categorize the applicant as one with an immutable trait and the social perception that she belongs to a group of people with the same immutable trait.¹⁴⁷ Unfortunately, the Board of Immigration Appeals ultimately rejected this argument, and found that battered women were not a recognized social group under the legal definition of a refugee.¹⁴⁸

VII. DIFFICULTIES POSED BY U.S. ASYLUM LAW FOR WOMEN THREATENED WITH HONOR-RELATED VIOLENCE

To qualify as a refugee within U.S. asylum law, an applicant must fall within one of several groups who fears persecution based on race, religion, nationality, membership of a particular social group, or political opinion.¹⁴⁹ While on its face, this definition seems very broad, it is a difficult one for women attempting to escape violence in their home countries to satisfy.

Gender-based violence encapsulates many of these themes, but is difficult to place into one of the categories articulated by U.S. asylum law.¹⁵⁰ For example, a woman could argue that she is being persecuted due to religion because her religious faith supports and encourages women to be murdered for bringing dishonor upon the family. While this may be true, it would be difficult to argue due to the fact that only women are being harmed in this religion, and not the men. Therefore, the harm being inflicted is not affecting a member of a particular religious group, but instead a member of a particular group within a larger religious group.

This same analysis can be applied to the other categorizations under U.S. and international asylum law. For example, a woman may also attempt to categorize her asylum application under a political opinion theory.¹⁵¹ She could argue she is being persecuted due to her political opinion. Specifically, she would argue women should be treated equally as men and should receive the same protections as men do in society. However, this argument would likely fail because an applicant possessing this political belief does not mean

146. *Id.* (describing how in the particular case, *Matter of L-R*, the female Mexican applicant framed her social group as “Mexican women who are viewed as property by virtue of their positions within a domestic relationship”).

147. *Id.* at 74.

148. *Id.* at 71.

149. *Refugees*, *supra* note 136.

150. *Id.*

151. *Id.*

that she will be automatically persecuted because of it. Surely, there are many other citizens with a similar political view who will not be harmed with honor-related violence. Therefore, this applicant would also likely be unsuccessful in crafting an application for asylum in the U.S.

Although the definition under U.S. and international asylum law for refugees seems broad and malleable, it has many cracks that would prevent women applying for asylum from successfully gaining asylum. In order to prevent this sort of issue, some critics suggest a new category should be added to the definition: gender.¹⁵² So far, asylum applications based on gender grounds have received little support within the United States.¹⁵³ Experts say this is mostly due to the common view that when women are persecuted, it is sometimes viewed as a cultural norm instead of a reason to grant asylum.¹⁵⁴

Another issue women threatened with honor violence face is accessing information about the asylum process and learning how to form an asylum application. Many women threatened with honor killings live in remote areas, and are sometimes only allowed to go into public so long as they are supervised by a male relative.¹⁵⁵ This dramatically reduces the ability of women to gather information about the application process and to gather the necessary documents needed to apply for asylum. Women in these communities also are unlikely to have access to the Internet or other sources that would provide insight about applying for asylum, which would also reduce the likelihood that they would understand asylum procedures at all, or even enough to submit a simple application.¹⁵⁶

In the same vein, although many women may not possess the knowledge or expertise to learn about applying for asylum, many women who do understand the asylum process also may lack the resources that are required to submit the application itself. For example, asylum applications may be filed at local U.S. embassies or consulates, or at United Nations High Commissioner for Refugees offices.¹⁵⁷ Because many of these women live in more remote, secluded areas, they may be located very far from the nearest embassy or U.N.H.C.R. office and there may be no way for the women to file

152. Twibell, *supra* note 28, at 196.

153. *Id.*

154. Karen Musalo & Stephen Knight, *Unequal Protection: When Women are Prosecuted, it's Often Described as a Cultural Norm Rather than a Reason to Grant Asylum*, 58 BULL. ATOMIC SCI. 56, 61 (2002).

155. See *Saudi Arabia: Male Guardianship Policies Harm Women*, *supra* note 25.

156. See, e.g., Scott Wallsten, *Regulation and Internet Use in Developing Countries*, 53 ECON. DEV. & CULTURAL CHANGE 501, 501 (2005).

157. *Asylum or Refugee Status: How to Apply*, *supra* note 120.

their applications in either of those locations.¹⁵⁸ Because of this, these women may not be able to physically submit an application, even if they have gathered all of the necessary materials and documents needed to begin the asylum process.

VIII. HOW U.S. ASYLUM LAW CAN CHANGE TO BETTER ACCOMMODATE ASYLUM APPLICATIONS TO REDUCE THE NUMBER OF HONOR SUICIDES

American asylum law can be modified in several ways to better accommodate women threatened with honor-related violence, in order to lower the overall number of women who will be forced to commit honor suicides. First, the United States could incorporate gender into the existing definition of a refugee within the Immigration and Nationality Act, the current U.S. law that defines who is and is not considered a refugee.¹⁵⁹ Second, the United States could lower the evidentiary standard needed to make a successful application claim when the applicant is a female threatened with honor-related violence.

As mentioned earlier in this Note, under current law, a refugee is defined as a person who is being persecuted, or is in fear of persecution, based on their race, nationality, religious belief, membership within a social group, or because of their political opinion.¹⁶⁰ Many women are unable to create successful asylum application based on these grounds, and instead, would benefit greatly by a new gender-based nexus being introduced.

Opponents to a gender-based criteria in asylum applications often argue that sexist policies cannot be classified as persecution, and allowing such applications to go through would open the floodgates of applicants attempting to enter the United States.¹⁶¹ Although allowing gender-based criteria to be added to the definition of who is a refugee would likely increase the number of asylum applicants, it is unlikely to “unleash the floodgates,” so to speak, because there are still many other restrictions in place to monitor who may or may not be granted asylum. As a result, the fear that many critics have about implanting this policy is largely unfounded, and would be

158. Ruane, *supra* note 71, at 1527–28.

159. 8 U.S.C.S. § 1101 (defining a refugee as a person who is being persecuted, or is in fear of persecution, based on their race, nationality, religious belief, membership within a social group, or because of their political opinion).

160. U.N. HIGH COMM’N FOR REFUGEES, *supra* note 110.

161. Lisa C. Chan, Note, *Everything in Moderation: Why Any Gender Nexus Must be Strictly Limited in Scope*, 29 B.U. INT’L L.J. 169, 188 (2011).

unlikely to have a striking effect on the number of refugees entering the country.

U.S. asylum law could also be modified by reducing the amount of evidence needed to successfully apply for asylum. As discussed earlier in this Note, applicants for asylum must provide documentation proving the persecution they are facing in their home country.¹⁶² While a broad array of documents are typically accepted by immigration officers for this purpose, including personal documents, medical records or newspaper articles, many women faced with honor-related violence would not have access to these documents, for several reasons.¹⁶³ First, many women in societies where honor killings are prevalent are delegated domestic roles that do not allow them to leave their homes. Second, if women in these societies are allowed out in public, typically they are required to be supervised by a male escort.¹⁶⁴ Both of these issues severely reduce the ability and opportunity for women to gather or find documents to prove their situations. Even further, many times there may be no documentation that would adequately prove that they are threatened with honor-related violence. Even worse, many documents suggesting that women were attacked with honor-related violence may only be available after it is too late and an assailant has already killed the victim.

Because many women applying for asylum to escape honor killings would have such difficulties gathering the appropriate documentation to prove their situation, the evidentiary standard should be drastically lowered in order to allow these female applicants to find asylum in the United States. Although there is a possibility that some applicants may abuse the system if the evidentiary standard is too low, this is unlikely to be the case for a majority of applicants. Further, due to the thoroughness of the asylum application process and the specialized experience of immigration court judges, it is likely that the applicants who are not truly applying for asylum to avoid honor killings will be easily identifiable and subjected to a stricter evidentiary standard.

This alteration to U.S. asylum law would greatly improve the probability that a female applicant faced with honor-related violence would be able to find asylum in the United States. Although this change would not fix the asylum application process completely, it would likely play some role in increasing the amount of female applicants accepted for asylum.

162. *Asylum or Refugee Status: How to Apply*, *supra* note 120.

163. *Id.*

164. *Saudi Arabia: Male Guardianship Policies Harm Women*, *supra* note 25.

IX. WHY U.S. ASYLUM LAW SHOULD CHANGE TO BETTER
ACCOMMODATE VICTIMS OF HONOR-RELATED VIOLENCE

Modifying the asylum application process to better accommodate and protect female victims of honor-related violence would serve several important public policy goals. First, it would allow individual victims a way to escape threats of violence and to find safety. It also would help individual victims by allowing them to settle in a completely new environment, where they would not be judged for any of their past "indiscretions." Second, modifying the asylum application process for female victims would also likely reduce the number of honor suicides worldwide, because it would give women threatened with violence an opportunity to escape their communities before succumbing to societal pressure and familial shaming, which may coerce them into going through with an honor suicide. Lastly, modifying the application process to be more accommodating to honor-violence victims would allow the U.S. to become an international role model and would help encourage other countries to adopt other similar, more lenient policies toward honor-violence victims, which would overall reduce the number of women murdered for honor crimes worldwide.

First, adapting the asylum application process to the specific needs of female honor-violence victims would encourage more female victims to seek asylum and find safe environments where they will not be threatened with violence. This would naturally benefit the individual female applicants, and give these women the opportunity to begin new lives free from the threat of violence. Modifying the asylum application process to aid female victims of honor-related violence would also send an important message to women in similar situations around the world, and could possibly inspire these women to apply for asylum instead of succumbing to the pressures from their societies which may urge them to kill themselves because it is the only way for them to preserve their families' honor.

Second, changing the asylum application process would also likely reduce the frequency of honor suicides, because it would give many women who previously had no way to escape their communities an opportunity to seek safety in a foreign country, and to avoid the societal pressure to go through with an honor-suicide. Instead, women will realize they have the opportunity to escape the threats and begin a new life elsewhere.

Lastly, modifying the asylum application process to better accommodate female victims of honor violence would improve the

U.S.'s reputation within the international community. New asylum reforms created to benefit women accompanied by information disseminated in communities where women are at the highest risk, would allow the U.S. to serve as an international role model of how to fight gendered and honor-related violence. If female victims are aware that they have a way to flee their situation and avoid threats made against them, they are less likely to undergo honor suicides. This, in turn, would benefit the U.S. politically, by portraying the U.S. as a strong protector of women's rights and freedoms, and it would also benefit the international community as a whole, by providing an example of how to help lessen the effects and reduce gendered and honor violence, and help protect women worldwide. Hopefully other countries would also become inspired by the U.S.'s strong stance on this issue, and implement similar policies in their own countries which would then lead to an overall increase in the amount of asylum options available for women threatened with honor violence.

CONCLUSION

Honor killings and honor-related violence continue to be a pressing issue in countries all over the world. Although it is difficult to accurately predict how many women worldwide are affected by this phenomenon, it is clear that honor-related violence is a problem that persists in many areas around the world and which is unlikely to subsist in the near future. Despite political and legislative changes already enacted in many countries where honor killings and suicides are prevalent, more initiatives are required worldwide.

The United States throughout history has often opened its arms to immigrants and refugees fleeing conflicts and persecution from throughout the world. This should not be different for women escaping gendered violence, and the United States should enact new laws and policies that would allow female refugees escaping gendered violence greater ease in finding asylum in the United States.

While women will still likely face difficulties throughout the asylum process, the United States can ease the application process by implementing a new gender-based category for asylum candidates, and by lessening the evidentiary standards needed to prove such asylum claims. These measures would constitute important first steps in a complex process that would also depend on getting information about asylum opportunities to the women who are at risk for honor-related violence. While these changes will not fix the

underlying problem of honor and gender-related violence faced by many women across the globe, by modifying U.S. asylum law to better accommodate women threatened with honor violence, the United States will help break the chain of violence globally, and allow threatened women a way to escape the danger and live in a society which celebrates their choices as women instead of condemns them.

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