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## THE UNITED STATES APPROACH TO PROSECUTION OF WOMEN TERRORISTS WHO JOINED THE ISLAMIC STATE

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**ABSTRACT:** In January 2012, the Secretary of State, in accordance with Section 219 of the Immigration and Nationality Act (INA), designated the Islamic State in Iraq Foreign Terrorist Organization (FTO). Based on this, the United States could take administrative measures against foreign terrorist fighters (FTFs) associated with IS, including women. As of January 2023, the United States had formally repatriated 39 citizens. At least 11 more citizens returned of their own accord outside of formal processes, including two women. To date, 11 adults affiliated with the Islamic State, formally repatriated from Syria and Iraq to the United States, have faced charges for terrorism-related crimes. The aim of this research is to characterize the approach to female terrorist returnees in the United States. The following research problem is central to this article: How does the United States deal with the prosecution and conviction of women returnees involved in the activities of the Islamic State? The author focused research on case studies. Research methods include: analysis, synthesis, classification, generalization, and statistical data analysis. Women who are left on their own and remain in camps and prisons in Iraq and Syria can impose the ideology of the Islamic State on others, including their children. It is important not to treat the problem of repatriation, rehabilitation, and reintegration of camp residents shortsightedly and to take a long-term solution.

**KEYWORDS:** gender, Islamic State, jihadism, judiciary, terrorism, women

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## PODEJŚCIE STANÓW ZJEDNOCZONYCH DO KOBIET, KTÓRE DOŁĄCZYŁY DO PAŃSTWA ISLAMSKIEGO

**ABSTRAKT:** W styczniu 2012 r. Sekretarz Stanu, zgodnie z art. 219 ustawy o imigracji i obywatelstwie (INA), uznał Państwo Islamskie w Iraku za organizację terrorystyczną. Na tej podstawie Stany Zjednoczone mogły podjąć środki administracyjne przeciwko zagranicznym bojownikom-terrorystom (FTF) powiązanych z Państwem Islamskim, w tym kobietom. Według stanu na styczeń 2023 r. Waszyngton formalnie dokonał repatriacji 39 obywateli. Co najmniej 11 kolejnych obywateli wróciło z własnej woli poza procesami formalnymi, w tym dwie kobiety. Do chwili obecnej 11 dorosłym powiązanych z Państwem Islamskim, formalnie repatriowanym z Syrii i Iraku do Stanów Zjednoczonych, postawiono zarzuty popełnienia przestępstw o charakterze terrorystycznym. Celem niniejszego artykułu jest charakterystyka podejścia do kobiet powracających do Stanach Zjednoczonych z Państwa Islamskiego. Sformułowano następujący problem badawczy: Jakie podejście prezentują Stany Zjednoczone w odniesieniu do ścigania i osądzania kobiet zaangażowanych w działalność Państwa Islamskiego? Autorka opiera badania na studium przypadków. Metody badawcze obejmują również: analizę, syntezę, klasyfikację, uogólnianie oraz analizę danych statystycznych. Przeprowadzone badania dowiodły, że kobiety pozostawione w obozach i więzieniach w Iraku i Syrii mogą narzucać ideologię Państwa Islamskiego innym, w tym przede wszystkim swoim dzieciom. Zatem ważne jest, aby problemu repatriacji, rehabilitacji i reintegracji mieszkańców obozów nie traktować krótkowzrocznie i zastosować rozwiązanie długoterminowe.

**SŁOWA KLUCZOWE:** dżihadyzm, kobiety, Państwo Islamskie, płeć, sądownictwo, terroryzm

## INTRODUCTION

The United States has been involved in regional conflicts for decades, trying to ensure the security and stability of the Middle East and maintain its own network of influence in the region. In June 2014, American air forces began operations against Islamic State (IS; also known as ISIS, Islamic State in Iraq and ash-Sham). In October, the operation was codenamed Inherent Resolve<sup>1</sup>. Over time, an international coalition was formed, a group of states and non-state actors, led by the United States, which pledged to cooperate in a common, multi-faceted and long-term strategy aimed at eliminating the self-proclaimed caliphate. The coalition was established formally on 7 August 2014, initially focusing its activities on the territory of Iraq. In September 2014, the coalition expanded the scope of its military operations against IS by launching air and missile strikes on Syrian territory. Despite this, the United States remained with a strategy called ‘Iraq first’<sup>2</sup>.

The United States, as the leader of the coalition, had to deal with many problematic issues related to divergent national and political interests of the coalition partners. After several years of struggle, on 9 December 2017, Prime Minister Haider al-Abadi announced the final victory over IS. On the same day in 2021, the United States formally ended its combat mission in Iraq, but retained its troops to serve as trainers and advisors to Iraqi security forces. On 23 March 2019, the Syrian Democratic Forces (SDF) announced the full liberation of the Syrian territory from IS occupation. Earlier in December 2018, President Donald Trump announced that American troops engaged in the fight against the Islamic State in Syria would soon withdraw. Despite this, in December 2022, US airstrikes continued against the remnants of IS forces in this country. However, it should be remembered that even paralyzing the activities of IS quasi-state structures will not erase the terrorist threat and will not end armed conflicts in the region, because they result from a deep socio-political and economic crisis. One of the manifestations of this threat is the problem of the individuals who joined the Islamic State and people who supported this structure in a non-military way. The existence of this problem is proven by the fact that in 2023 r. The United States and Gulf Cooperation Council (GCC) member states have said that to reduce the risk of a re-emergence of IS in Syria and Iraq, a concerted global effort should be encouraged to find a solution to the problem of individuals currently detained in camps and detention centers in northeastern Syria<sup>3</sup>.

According to Nathan Sales, the Coordinator for Counterterrorism, US Department of State, the United States is setting an example to the international community by taking steps to

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<sup>1</sup> U.S. Central Command, *Iraq and Syria Operations Against ISIL Designated as Operation Inherent Resolve*, Release #20141018, October. 2014, <http://www.centcom.mil/en/news/articles/iraq-and-syria-ops-against-isil-designated-as-operation-inherent-resolve> (15.07.2023); *Vide* M.S. Stempień, *Państwo Islamskie: nowe oblicze terroryzmu?*, Warszawa-Siedlce 2023.

<sup>2</sup> F. Kaplan, *Obama's way*, “Foreign Affairs” 2016, January, pp. 56-58.

<sup>3</sup> U.S. Department of State, *Joint Statement of the United States of America and U.S.-Gulf Cooperation Council Counterterrorism Working Group*, February 2023, <https://www.state.gov/jointstatement-of-the-united-states-of-america-and-u-s-gulf-cooperation-council-counterterrorism-working-group/> (17.07. 2023).

repatriate American citizens accused of supporting IS<sup>4</sup>. However, some sources indicate that if there is a deficit in evidence to make a conviction of a suspect highly probable, the United States has been inclined to repatriate its citizens<sup>5</sup>. The refusal to repatriate citizens, it believes pose an ongoing threat, is a major limitation of US repatriation policy<sup>6</sup>. In September 2022, Senator Jeanne Shaheen announced a bill that would appoint a senior coordinator on the issue of Syrian camps, where people associated with IS are detained, and make it US policy to repatriate camp residents<sup>7</sup>. In 2020 Sec. 1224. of established the office of Coordinator for Detained ISIS Members and Relevant Populations in Syria for “all matters for the United States Government relating to ISIS members who are in Syrian Democratic Forces custody”<sup>8</sup>. In September 2023, the Senate modified the establishment of this office, stating that it was designated “to serve within the executive branch as senior-level coordinator to coordinate, in conjunction with other relevant agencies, matters related to ISIS members who are in the custody of the Syrian Democratic Forces and other relevant displaced populations in Syria”<sup>9</sup>.

For many years, terrorist laws and counterterrorism measures have focused on men rather than women as a terrorist threat. Accepting this type of approach may pose a threat. As procedures are developed to deal with returnees in their home countries, there is a risk that women may avoid the criminal justice system and some of them will play a role in future IS terrorist networks. The aim of this research is to characterize the approach to female terrorist returnees prosecution in the United States.

## **THEORETICAL APPROACH AND METHODOLOGY**

The aim of this research is to characterize the approach to female terrorists returning to the United States. According to the United Nations, as of April 2019, the main Syrian Democratic Forces’ (SDF) camp Al-Hol accommodated approximately 75,000 people; of these 15% were foreign citizens<sup>10</sup>. According to The International Centre for Counter-Terrorism (ICCT): “Approximately 300 Americans are estimated to have traveled or attempted to join the Islamic State (ISIS) as part of the group’s campaign in Syria and Iraq between 2013 and 2019. These

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<sup>4</sup> J. Seldin, *American Mom Who Joined IS Sentenced to More Than 6 1/2 Years in Prison*, November 2020, [https://www.voanews.com/a/usa\\_american-mom-who-joined-sentenced-more-6-12-years-prison/6198171.html](https://www.voanews.com/a/usa_american-mom-who-joined-sentenced-more-6-12-years-prison/6198171.html) (4.12.2022).

<sup>5</sup> Ch. Savage, et al., *American ISIS Suspect Is Freed After Being Held More Than a Year*, The New York Times, October 2018, <https://www.nytimes.com/2018/10/29/us/politics/isis-john-doe-released-abdulrahmanalsheikh.html> (18.07. 2023).

<sup>6</sup> A. Marcha, *Far From Home. Overcoming the Challenges to Repatriating Foreign Women Who Joined the Islamic State*, “University of Illinois Law Review” 2021, 3, p. 1174.

<sup>7</sup> *Shaheen on ISIS Displaced Persons*, Politico, 28.09.2022, <https://www.politico.com/minutes/congress/09-28-2022/shaheen-on-isis-displaced-persons/> (18.07.2023).

<sup>8</sup> Public Law 116–92–DEC. 20 2019, <https://www.govinfo.gov/content/pkg/PLAW-116publ92/pdf/PLAW-116publ92.pdf>.

<sup>9</sup> S.356 - Syria Detainee and Displaced Persons Act 2023, <https://www.congress.gov/bill/118th-congress/senate-bill/356/text?format=txt&r=42&s=1> (18.07.2023).

<sup>10</sup> UN News, ‘Foreign Children’ in Overwhelmed Syrian Camp Need Urgent International Help, Says Top, April 2019, <https://news.un.org/en/story/2019/04/1036901> (16.07.2023).

individuals joined more than 53,000 men, women, and minors from roughly 80 countries”<sup>11</sup>. Another problem is that women are detained, often with their children, in Iraqi prisons. In February 2023, at least 400 women went on a hunger strike in the Rusafa prison in Baghdad. The group of women imprisoned for being part of the Islamic State is said to include United States citizens<sup>12</sup>.

Even if states do not make an effort to repatriate their citizens associated with the Islamic State, some of them and their families were and will be able to make their way back to the country of origin<sup>13</sup>. The following research problem is central to this article: How does the United States deal with the prosecution and conviction of women returnees involved in the activities of the Islamic State? The author focuses on case studies. Research methods include: analysis, synthesis, classification, generalization and statistical data analysis.

The research process encountered a significant limitation related to the specific approach adopted by the United States, that is, the secrecy of some cases. The public often knows that IS-related proceedings are underway, but there is no detailed information about them. Therefore, integrating data from these cases would distort the findings of the quantitative analysis carried out in this article. For this reason, they are not included. The data presented in the article is current as of October 8, 2023.

## **AMERICAN CITIZENS IN THE SELF-PROCLAIMED CALIPHATE**

According to data provided by the United States Central Command (CENTCOM) in 2022, CENTCOM conducted 313 total operations against the Islamic State in Iraq and Syria. As a result, at least 625 IS operatives were killed (466 in Syria, 159 in Iraq), and 374 operatives were detained (215 in Syria, 159 in Iraq). These data indicate that the problem of fighting the remnants of IS still exists and that more people are still being brought to the United States to be held accountable for their actions related to IS activities<sup>14</sup>.

As mentioned above, approximately 300 Americans traveled to or attempted to join Islamic State in the Iraq and Syria in years 2013-2019. Perhaps this number increased in subsequent years. CENTCOM data shows that many operations resulted in the death of IS operatives. However, some of them had previously withdrawn from the fight. Also, their families took refuge in safe places, fled to other countries, or were detained by security forces. “As of July 15, 2023, 39 US persons have been officially repatriated, including both adults and minors.

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<sup>11</sup> T. Mehra, M. Herbach, D. Margolin, A. Doctor, *Trends in the Return and Prosecution of ISIS Foreign Terrorist Fighters in the United States*, ICCT/NCITE Report 2023, <https://www.icct.nl/sites/default/files/2023-08/NCITE%20final%20with%20alt%20cover.pdf>, p. 1.

<sup>12</sup> M. Shishani, N. Sturdee, *Islamic State: Hundreds of women on hunger strike at Iraqi prison*, BBC, May 2023, <https://www.bbc.com/news/world-middle-east-65498377> (5.08.2023).

<sup>13</sup> M. López González, *EU's Member States Dilemma to the ISIS Women and Minors remaining in Syrian camps*, Opinion Paper 101/2021, Instituto Español de Estudios Estratégicos, [https://www.ieee.es/Galerias/fichero/docs\\_opinion/2021/DIEEEO101\\_2021\\_MARLOP\\_Dilema\\_ENG.pdf](https://www.ieee.es/Galerias/fichero/docs_opinion/2021/DIEEEO101_2021_MARLOP_Dilema_ENG.pdf), p. 10.

<sup>14</sup> U.S. Central Command, *CENTCOM – Year in Review 2022: The Fight Against ISIS*, Release Number 20221229-1, December 2022, <https://www.centcom.mil/MEDIA/PRESS-RELEASES/Press-Release-View/Article/3255908/centcom-year-in-review-2022-the-fight-against-isis> (19.08.2023).

At least 11 additional U.S. persons have returned on their own accord, ten of whom remained in the U.S. following their return”<sup>15</sup>. Most adult returnees have faced prosecution for terrorist-related crimes. Three of them were charged, interestingly, not with crimes related to terrorism, but with making false statements to American immigration and border authorities. Details about several other cases remain sealed<sup>16</sup>.

## **THE UNITED STATES APPROACH TO THE PROSECUTION OF FEMALE TERRORISTS**

In the United States, as of summer 2018, 178 individuals have been charged with offenses related to the activity of the Islamic State. At that time, the average age for convicted men was 13.8 years and for women only 5.8 years. It should be noted that this number also applies to those jihadists operating only on US territory, that is, those who did not travel to Iraq and Syria<sup>17</sup>. According to the Center on National Security at Fordham Law in August 2019 it was 185 cases<sup>18</sup>. As of January 2023, the United States had formally repatriated 39 citizens, 15 adults and 24 minors<sup>19</sup>. According to ICCT, 16 of them faced criminal prosecution for terrorism charges committed abroad. 10 were repatriated from Syria, 1 from Iraq, 1 was deported from Turkey, 1 was extradited from Bosnia and Herzegovina, and 3 transferred to American custody<sup>20</sup>. Many analyzes refer to the time after the fall of the self-proclaimed caliphate, so people who left its ranks earlier are not taken into account. On this basis, previous data exclude, for example, Daniela Greene, probably due to the time of committing the crime.

In 2014, Daniela Greene, a translator from the Federal Bureau of Investigation (FBI) with a top secret security clearance, traveled to Syria and married a key IS operative, Denis Cuspert, whom she had been assigned to investigate. Cuspert, known as Deso Dogg, was a German rapper and convert who joined the Islamic State in 2013. Greene, regretting her decision, was able to leave Syria and returned to the United States, where she was immediately arrested. She pleaded guilty to making false statements involving international terrorism. She was arrested in August 2014 and later sentenced to 2 years in federal prison<sup>21</sup>. She received a lighter sentence because of her cooperation.

In November 2020, a court delivered the verdict in the case of 35-year-old Samantha El-Hassani, who had taken children to her husband in Syria more than five years earlier. The woman from Indiana was captured by the SDF and transported to the United States in July

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<sup>15</sup> T. Mehra et al., *Trends in the Return and Prosecution...*, op. cit., p. 1.

<sup>16</sup> *Ibidem*, pp. 1-2.

<sup>17</sup> A. Doctor, et al., *Reintegration of Foreign Terrorist Fighter Families: A Framework of Best Practices for the U.S.*, NCITE Center 2023, <https://www.washingtoninstitute.org/media/6338?disposition=inline>, p. 5.

<sup>18</sup> Center on National Security at Fordham Law

<sup>19</sup> A. Doctor, et al., *Reintegration of Foreign Terrorist...*, op. cit., p. 5

<sup>20</sup> K. Jones, *Islamic State Men and Women Must be Treated the Same*, August 2019, <https://www.e-ir.info/2019/08/26/islamic-state-men-and-women-must-be-treated-the-same/> (8.02.2023); T. Mehra et al., *Trends in the Return and Prosecution...*, op. cit., pp. 2-3

<sup>21</sup> S. Glover, *The FBI translator who went rogue and married an ISIS terrorist*, CNN 2017, <https://edition.cnn.com/2017/05/01/politics/investigates-fbi-syria-greene/index.html> (20.12.2022).

2018 with her four children, two of whom were born in Syria. Accused of supporting the Islamic State, she was sentenced to 6.5 years in prison, and then 3 years under post-sentence supervision<sup>22</sup>.

The next case is that of Allison Elizabeth Fluke-Ekren, a 42-year-old woman, a former resident of Kansas, who traveled to Syria to join IS. Since her departure from the United States, she has allegedly been involved in terrorism-related activities, including planning and recruiting operatives for future attacks and serving as the leader and organizer of a military battalion, known as Khatiba Nusaybah, which trained women. Fluke-Ekren was accused of providing and conspiring to provide support or resources to a foreign terrorist organization<sup>23</sup>. In November 2022, Fluke-Ekren was sentenced to 20 years in prison and 25 years of supervised release (Table 1)<sup>24</sup>. This case may show a shift in the approach of the American justice system towards more severe sentences. Fluke-Ekren is also the first and so far only American woman prosecuted for a leadership role in the Islamic State. Despite this sentence, it seems that in many countries we still observe the trend that “women routinely received the lightest prison sentences. In some cases, women who participated with men in criminal conduct were not charged with any crimes at all.”<sup>25</sup>

Table 1. Cases of Women Returnees Prosecutions in the U.S. (as of October 1, 2023)

Name	Type of crime	Sentence date	Sentence
Daniela Greene	making false statements involving international terrorism	August 2014	2 years in prison
Samantha El-Hassani	financing terrorism	November 2020	6.5 years in prison and 3 years of supervised release
Allison Elizabeth Fluke-Ekren	providing and conspiring to provide material support or resources to a foreign terrorist organization	November 2022	20 years in prison and 25 years of supervised release

Source: own study.

## DISCUSSION OF THE RETURN PROCESS AND PROSECUTION

As of January 2023, the United States had formally repatriated 39 citizens. At least 11 more citizens returned of their own accord outside of formal processes, including two adult women<sup>26</sup>. To date, 11 adults allegedly affiliated with the Islamic State, formally repatriated from Syria and Iraq to the United States, have faced charges for terrorism related crimes. 10 of

<sup>22</sup> Ibidem.

<sup>23</sup> Department of Justice U.S. Attorney’s Office, *Eastern District of Virginia, American Woman Who Led ISIS Battalion Charged with Providing Material Support to a Terrorist Organization*, January 2022, <https://www.justice.gov/usao-edva/pr/american-woman-who-led-isis-battalion-charged-providing-material-support-terrorist> (8.02.2023).

<sup>24</sup> Office of Public Affairs. U.S. Department of Justice, *American Woman Who Led ISIS Battalion Sentenced to 20 Years*, <https://www.justice.gov/opa/pr/american-woman-who-led-isis-battalion-sentenced-20-years> (17.07.2023).

<sup>25</sup> K.J. Greenberg (ed.), *The American Exception: Terrorism Prosecutions in the United States—The ISIS Cases. March 2014 – August 2017*, Center on National Security, Fordham University School of Law 2017, [https://static1.squarespace.com/static/5b16a000e17ba39f6f3825ba/t/5d55bbc85305170001e35b9a/1565899720854/CNS\\_the\\_american\\_exception\\_sep2017.pdf](https://static1.squarespace.com/static/5b16a000e17ba39f6f3825ba/t/5d55bbc85305170001e35b9a/1565899720854/CNS_the_american_exception_sep2017.pdf), p. 14.

<sup>26</sup> A. Doctor et al., *Reintegration of Foreign Terrorist...*, op. cit., p. 5

them were repatriated from Syria and one from Iraq. These cases included Samantha El-Hassani and Allison Elizabeth Fluke-Ekren.

The second formal process of the returnees is extradition or deportation from a third country. Two men and no women returned to the United States through this procedure. The third process is not associated with repatriation as it concerns citizens of third countries.

Another example is of individuals who managed to return to the United States on their own. This applies especially to cases before the fall of the self-proclaimed caliphate, and therefore before the establishment of detention camps. The example is the aforementioned case of Daniela Greene.

Not all individuals are referred to the criminal justice system. In June 2019, the United States repatriated and resettled two women and six minors who were held at the Al-Hawl camp. Their identities have not been revealed<sup>27</sup>. This case demonstrates that prosecution is just one element of the United States' approach to repatriation. Additionally, this example does not concern women, but two British male citizens who were deprived of their citizenship in 2018 and a Saudi-born Canadian citizen captured by Syrian forces in January 2019<sup>28</sup>.

John C. Demers, Assistant Attorney General for National Security stated that “the United States has brought back every American supporter of ISIS known to be held by the Syrian Democratic Forces against whom we have charges.” Demers also said that “The Department of Justice has worked tirelessly over the years [...] to investigate, repatriate and charge people who willingly left to support these [terrorist] organizations. This was our moral responsibility to the American people and to the people of the countries to which these terrorists traveled. The Department has also supported the efforts of other responsible nations to do the same, including sharing evidence and know-how. We will continue to do so for any country that takes responsibility for their citizens who left to take up arms in support of ISIS’s reign of hate and intolerance”<sup>29</sup>.

Entirely different case is Hoda Muthan, who was born in New Jersey in October 1994 as the daughter of a diplomat from Yemen. Hoda left the United States to join IS in 2014, most likely after becoming radicalized on the Internet. At the age of 17 she began to distance herself from the local community and started reading fundamentalist literature online. She then created an account on Twitter, gaining thousands of like-minded followers<sup>30</sup>. As an adult woman, she studied at the University of Alabama, Birmingham. In 2016, the authorities revoked her passport. The family appealed against this decision to allow her to return to the US. In 2019, a federal judge ruled that the government correctly determined that Muthan is not a US citizen despite her birth in that country. The decision was made based on the diplomatic status of her father. Children of diplomats do not enjoy natural citizenship. Muthan surrendered to the US-

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<sup>27</sup> A, Marcha, *Far From Home...*, op. cit., p. 1175.

<sup>28</sup> T. Mehra et al., *Trends in the Return and Prosecution...*, op. cit., p. 5.

<sup>29</sup> Office of Public Affairs, U.S. Department of Justice, *The United States Has Repatriated 27 Americans from Syria and Iraq Including Ten Charged with Terrorism-Related Offenses for Their Support to ISIS*, <https://www.justice.gov/opa/pr/united-states-has-repatriated-27-americans-syria-and-iraq-including-ten-charged-terrorism> (17.07.2023).

<sup>30</sup> L. Vidino, *Hughes Seamus, ISIS in America: From Retweets to Raqqa*, Program on Extremism December 2015, <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/downloads/ISIS%20in%20America%20-%20Full%20Report.pdf>, p. 9.

backed SDF. She was placed with her child in a refugee camp. Muthan states that she regrets her decision to join the group<sup>31</sup>. On 10 January 2022, the US Supreme Court refused to review her appeal to seek permission to return to the United States.

## CONCLUSIONS AND PERSPECTIVES

The international community has taken three main strategies to address the issue of individuals who joined the Islamic State: repatriation to their country of citizenship, where they become the subject of prosecution; leaving matters in the hands of the Iraqi and Syrian authorities, usually tantamount to prosecution in these countries; refusing individuals to return to the country of citizenship by citizenship stripping<sup>32</sup>. In the United States, the first strategy, that is, repatriation and prosecution of citizens, is the most popular approach.

Decision makers in the United States urge other countries, especially Western Europe, to take responsibility for their citizens. As Govier and Boutland remark, a state knowingly leaving its citizens exposed to the dubious judicial treatment provided by a third party is neglecting its duties<sup>33</sup>. The United States is trying to set an example to the international community by taking steps to repatriate US citizens accused of supporting IS. However, the United States has not adopted an official repatriation strategy; decisions are made individually for each case. It does not change the fact that individuals, including women, will be punished on the territory of the United States. To supporters of a radical approach in which people associated with IS are deprived of their citizenship, this may seem a gentle or moderate policy.

This article concerns women, but we should not forget that in Iraq and Syria, with them, are their children, who get older every year, and are deprived of access to education, and have basically no chance of normal development. Women who are left on their own and remain in camps may impose the ideology of the Islamic State on their children<sup>34</sup>. According to General Michael “Erik” Kurilla, CENTCOM commander: “These children in the camp are prime targets for ISIS radicalization. The international community must work together to remove these children from this environment by repatriating them to their countries or communities of origin while improving conditions in the camp.” That is why it is so important not to treat this problem short-sightedly and to take a long-term solution in the form of “repatriation, rehabilitation, and reintegration of the camp residents back to their country of origin”<sup>35</sup>.

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<sup>31</sup> A. Suliman, *Alabama Woman Who Became ‘ISIS Bride’ Will Continue Legal Fight to Return to U.S.*, Lawyers Say, Washington Post January 2022, <https://www.washingtonpost.com/nation/2022/01/13/hoda-muthana-islamic-state-alabama-supreme-court/> (19.07.2023).

<sup>32</sup> A. Marcha, *Far From Home...*, op. cit., p. 1170.

<sup>33</sup> T. Govier, D. Boutland, *Dilemmas Regarding Returning ISIS Fighters*, “Ethics & Global Politics” 2020, 13(2), pp. 93-107.

<sup>34</sup> J. Davis, *The future of the Islamic State’s Women: assessing their potential threat*, International Centre for Counter-Terrorism 2020, <https://www.jstor.org/stable/resrep25260>.

<sup>35</sup> U.S. Central Command, *CENTCOM – Year in Review 2022: The Fight Against ISIS, Release Number 20221229-1*, <https://www.centcom.mil/MEDIA/PRESS-RELEASES/Press-Release-View/Article/3255908/centcom-year-in-review-2022-the-fight-against-isis> (19.07.2023).



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