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GANG CULTURE AND VIOLENCE AGAINST WOMEN IN EL SALVADOR, HONDURAS, GUATEMALA

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It is well known that El Salvador, Honduras, and Guatemala have some of the highest rates of violence against women in the world and that the region is seriously affected by the presence of gangs. What is less recognized is the fact that, within this context of rampant gender-based violence, gang members pose not only a unique risk to females but also in many instances the most extreme risk. As such, it is imperative that immigration professionals across the spectrum understand the gender dynamics within gang culture and the way in which those dynamics translate to risk to females.

El Salvador, Honduras, and Guatemala (the Northern Triangle) are male-dominated societies in which young girls and women are subjected to the psychologically, physically, and sexually coercive behavior of males. These well-documented abuses occur within the home, within the community—including schools and workplaces—and within state institutions, such as child welfare shelters, secure

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witness protection programs, and juvenile and adult correctional facilities.¹

In addition to more commonly recognized forms of violence, females are also frequent victims of femicide, the gender-based killing of girls and women. Femicide is the most extreme form of fatal violence against women and is characterized by a number of factors that differentiate it from simple murder, including (1) the savagery of the attacks, which often involve removal of victims' wombs, breasts, and heads, (2) the rape and/or other forms of extreme sexual abuse, (3) the deliberate destruction of identifying features through burning or other means, (4) the ritualization of the crime and/or crime scene, and (5) the political significance and messaging of the murders.² Victims of femicide tend to be poor, under-educated, and/or in some way perceived as violating male sensibilities or male-dominated cultural norms. Husbands, domestic partners, or male members of their extended family are frequently responsible for the killings. Single women and/or those who lack a male-dominated family network are particularly vulnerable to victimization by strangers or men with whom they have peripheral associations.

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Although the populations of the Northern Triangle societies do not actively promote or condone violence against females, neither do they demand a more vehement government response to it or challenge the machista attitudes and institutional factors that underlie the problem, such as lack of justice system access, economic marginalization, and social isolation for women who do attempt to escape abusive relationships. In fact, in a critical manner, these societal attitudes and institutional factors prop up the socio-cultural structures that give rise to the problem and, in so doing, perpetuate it.

Despite the persistent and sometimes dangerous efforts of women's rights advocates in each of the countries and the enactment of laws to prevent violence against females and to punish offenders, females remain vulnerable. Children and adolescents remain trapped in underfunded, dysfunctional, and oftentimes corrupt and dangerous child welfare systems; women who seek assistance from police, prosecutors, and the courts are oftentimes dismissed and even shamed. Further, when women do seek state protection, it often exacerbates an already dangerous situation as offenders subject them to reprisals for having done so. As such, females have been conditioned to believe that seeking government intervention is not only futile but also dangerous. This results in a situation in which, for the vast majority of females—children, adolescents, and adults—experience demonstrates that the state does not represent a resource and that, as victims, they have been largely abandoned by the governments charged with protecting them and enforcing the laws of their countries.

Economic marginalization and social isolation is critical as they prevent many women in abusive relationships from even attempting to leave. Abusive male partners typically control every dimension of their partners' lives, including restricting their access to finances and social networks, oftentimes even preventing them from visiting or communicating freely with members of their own families. When women do seek support from their family-social network, offenders routinely intimidate and threaten those whom they solicit for assistance, causing those parties to back away for fear of reprisals.

It is particularly difficult for women with children to

leave abusive relationships as they are frequently stigmatized for “breaking up the family” and find themselves socially isolated. Moreover, because the children are oftentimes at risk of abuse, or actually being abused, the women may represent the only protective buffer between the offender and the children. As such, because women lack the financial resources, family-social support, and government assistance necessary to remove their children from the home, they are forced to remain in abusive relationships or make the wrenching choice of leaving them in a home situation that has been made even more dangerous due to the offender’s rage over the woman’s departure.

This combination of economic marginalization, social isolation, stigmatization, unresponsive justice systems, and reluctance to seek government protection not only makes it virtually impossible for the majority of women to escape abusive relationships but also conspires to create a climate of impunity for male offenders. As of 2014, the overall impunity rate for crimes of sexual violence in Honduras stood at 95%.³ In Guatemala in 2012, of more than 2,000 cases of child sexual assault reported to authorities, only eight resulted in convictions.⁴ In 2014, the impunity rate for femicide in El Salvador was 77%.⁵

Insofar as it relates specifically to gang culture and violence against females, the crisis exists within the larger context of violence against females, but, in certain respects, it must be recognized as distinct from the larger phenomenon. As such, before discussing the particular manifestations of gang culture and violence against females, we provide background on the larger problem of gender-based violence and the socio-political context within which it occurs within the Northern Triangle.

COUNTRY PROFILES: VIOLENCE AGAINST WOMEN

El Salvador

El Salvador is commonly recognized as one of the most dangerous countries in the world for women.⁶ Between 2001 and 2011, while the country’s overall homicide rate doubled, the rate of violent deaths among women increased five-fold.⁷ Not only has El

Salvador failed to record a reduction in rates of violence against women but also police statistics indicate that the problem is actually worsening.⁸ With respect to femicide alone, the number of reported cases increased from 40 in 2012—the first year that gender-based killing of females was specifically designated as a crime and recorded—to 340 in 2015, an increase of 750%.⁹

The rampant nature of violence against women has been well documented by the United Nations High Commissioner for Refugees (UNHCR), the *Procuraduría de Derechos Humanos* (Human Rights Ombudsman)—a quasi-governmental organization charged with defending human rights and investigating allegations of abuses—the U.S. State Department, numerous domestic women’s right organizations, international human rights monitors, and the media. In 2010, the United Nations (U.N.) Special Rapporteur on Violence against Women expressed grave concerns over the scope of the problem and the Salvadoran government’s inadequate response to it.¹⁰ In 2015, Amnesty International reported that “high rates of violence, low reporting, and impunity are factors” that impede progress in addressing violence against women in El Salvador.¹¹

Generally speaking—recognizing that there are case-by-case exceptions—police in El Salvador typically fail to respond adequately to violence against girls and women, and, when officers do respond, it is commonly agreed that in a significant majority of instances they fail to take effective action to protect the victim or to conduct professional investigations. In addition to the failure of police to act on behalf of girls and women, officers may actually pose a threat to them—including women who have sought police assistance. During a 2016 interview, representatives from one of the country’s most prominent women’s rights organizations reported that police officers represent one of the groups that pose the greatest risk to females, including the risk of sexual violence.¹²

In 1996, the Salvadoran Legislature passed Decreto (Decree) 902, the *Ley Contra la Violencia Intrafamiliar* (Law Against Intra-Family Violence), which outlawed physical and psychological violence and amended the country’s penal code the following year by specifying

penalties for violations.¹³ According to the U.S. State Department, however, the law had no discernable effect in the years following its passage.¹⁴ In fact, according to all governmental and nongovernmental organizations with a stake in the issue, the levels of violence against women rose consistently since passage of this law.

According to *El Instituto Salvadoreño para el Desarrollo de la Mujer*—ISDEMU (The Salvadoran Institute for the Development of Women)—the issue is not one of implementing new legislation but one of devoting appropriate resources to the problem, making policy adjustments, and enforcing laws that are already in place.¹⁵ Despite pressure from the ISDEMU to prioritize and enforce existing laws, in November 2011, the Salvadoran government approved Decreto 502, the *La Ley Especial Integral para una Vida Libre de Violencia para las Mujeres* (The Integrated Special Law for a Life Free of Violence for Women).¹⁶ This law remains in place, but since its passage the problem has continued to worsen. For instance, in 2014, a Salvadoran human rights activist reported that prosecutors' offices in El Salvador are often so backlogged with cases that, on average, rape cases are being investigated seven years after their occurrence.¹⁷

Insofar as it relates specifically to children and youth, in 2009, the Salvadoran government passed the *Ley de Protección Integral de la Niñez y Adolescencia*—LEPINA (Law for Integral Protection of Children and Youth).¹⁸ One of the unintended consequences of the law was that it became much more difficult for small-scale nonprofits to function as the law mandates that children's shelters meet numerous standards that are ideal in theory but are often impossible to meet given limited budgets. Homes that historically outsourced psychological services were obligated to hire psychologists on their own staff and adhere to numerous other requirements. One of those groups, *Fundación Amor*, attempted to meet these restrictions for several years, but, with an aging donor base, they were eventually forced to close the children's shelter.

Case Profile: “Alexandra”¹⁹

At the age of seven, Alexandra reported attempted

sexual abuse by her stepfather to a caring neighbor in San Salvador. The neighbor brought Alexandra's case to the Instituto Salvadoreño para el Desarrollo Integral de la Niñez y la Adolescencia—ISNA (Salvadoran Institute for the Integrated Development of Children and Adolescents)—which resulted in Alexandra being referred to Fundación Amor. Alexandra spent two years in the home, during which time she grew personally, socially, and educationally.

Following implementation of the LEPINA and the closure of Fundación Amor, all of the girls were returned to their homes, and, despite the fact that their cases had been referred by ISNA, none of them was sent to another children's shelter; they were simply returned to the dangerous environments that they had been removed from. Alexandra was sent back to her home despite the fact that her mother, sister, and grandmother suffer from severe psychological disorders that rendered them unable to protect her and that her abusive stepfather remained in the home. Adding to the situation was the fact that her brother, who had been her sole source of emotional support, had recently joined a gang and was spending less time in the home.

The same concerned neighbor checked in on Alexandra after she was returned to the home, but that neighbor soon left the country. Two weeks after the neighbor's departure, she was notified that Alexandra was in the children's hospital, where she spent 15 days after seriously injuring herself while running from her stepfather to avoid being sexually assaulted. While at the hospital, she admitted that her stepfather had raped her over 10 times since the neighbor left and had threatened to kill her if she disclosed the abuse; she was 10 years old at the time. Following her physical recovery, she was placed in an ISNA shelter, but her psychological trauma was so acute that she did not remember the neighbor nor the two years that she had spent at Fundación Amor.

When Alexandra's neighbor returned to El Salvador in 2016, she began searching for Alexandra. She found out that Alexandra's brother had been tortured, murdered, and dismembered and that Alexandra's mother attempted to force her not to report the abuse that she suffered at the hands of her stepfather to government

officials. Despite pressure from her mother, Alexandra did tell her story, and a decision was made to file charges against her stepfather. Three years later, however, the prosecutor's office has not processed the case, and the stepfather remains in the home.

The neighbor contacted Alexandra's social worker, who admitted that they had not visited her in several years because program staff were no longer able to work in violent, gang-affected neighborhoods. As such, she was unaware that Alexandra's brother had been killed or that her stepfather was still in the home and living with young children. The neighbor filed a report with the Consejo Nacional de la Niñez y de la Adolescencia—CONNA (National Counsel for Children and Adolescents)—demanding a state inspection of the circumstances of the children, but six months later no action had been taken. It may be that, like ISNA staff, CONNA investigators and social workers have been forced to avoid some gang-controlled neighborhoods, leaving the most vulnerable children completely defenseless.

Honduras

Between 2002 and 2012, over 3,000 Honduran girls and women were murdered,²⁰ and during the period 2005–2013, the number of violent deaths increased approximately 265%.²¹ In 2011, gender-based violence was the second highest cause of death for women of reproductive age in Honduras.²² According to a 2014 report by the United Nations Special Rapporteur on Violence Against Women, 27% of females ages 15–49 reported being subjected to violence within the home, and the figure rose to 37% for women between ages 45–49.²³

In 1997, the Honduran government passed Decreto 132-97 the *Ley contra la Violencia Doméstica* (Law against Domestic Violence), which included language prohibiting physical, psychological, sexual, and economic violence.²⁴ According to the U.N. Special Rapporteur on Violence Against Women, however, “The adoption of the Domestic Violence Law in 1997, and its amendment through Decrees No. 250/2005 and No. 35 in 2013, has not led to an effective legislative response to domestic violence, and it remains the lead-

ing cause of reported crimes against persons at the national level. Significant challenges persist in the area of accountability for acts of violence against women and girls.” Additionally, “the lack of accountability for violations of human rights of women, is the norm rather than the exception.”²⁵

Around the time when the *Ley contra la Violencia Doméstica* was approved, the Honduran government also established the *Fiscalía Especial de la Mujer* (Women's Special Prosecutor) to investigate and prosecute cases involving violence against women. According to the UNHCR, the U.S. State Department, nongovernmental women's rights organizations, and the Honduran press, however, the government lacks the political will to enforce its own laws, and rates of prosecution remained unacceptably low.²⁶ The U.S. State Department cites the fact that a small number of reporting and service centers exist for victims of violence against women as well as community centers that offer a range of services, including domestic violence prevention, but acknowledges that these services are not adequately funded.²⁷ According to information provided during interviews with women's rights advocates, there are five such centers in the entire country, which has a population of over 3.5 million females, and those services are concentrated in urban areas and are typically not accessible to the significant percentage of the population which lives in rural communities.

Case Profile: “Maria”

As a young teenager, a man we will refer to as “Julio,” who was nearly 20 years Maria's senior, began approaching her and asking that she date him. She politely declined, but Julio's requests became increasingly coercive, eventually asserting that she was his “property” irrespective of her perception or desire to the contrary. He then began threatening to harm or kill members of Maria's family if she did not acquiesce to his demands. Shortly thereafter he abducted and raped her, then forced her into what became over 10 years of domestic servitude, psychological, physical, and sexual violence.

Early on after Julio abducted Maria, her parents

accepted that there was nothing that they could do as he maintained social relationships with police officers known to be involved in corrupt activity and they recognized that seeking police intervention would not only be pointless but also further endanger Maria; specifically, they feared that Julio would subject her to more extreme—and potentially lethal—violence to “punish” them for taking action against him. Additionally, her parents feared that taking official action would put the rest of the family at risk.

Julio controlled every aspect of Maria’s life. He refused to allow her to work, engage in social relationships, or visit her family. She was allowed to speak to her parents by phone periodically, but he hovered over her during the conversations to control what she said and threatened to harm her family if she disclosed the abuse. At times, he was so obsessive that he locked her in a bedroom when he left the house. In addition to routine beatings and rapes, Julio also attacked her with a machete, threw scalding water at her face in an attempt to scar her to ensure that no other man would want to be with her, whipped her with electrical cords, and punched her in the stomach when she became pregnant, which caused her to miscarry.

Maria finally mustered the courage to escape the relationship, but Julio continued to threaten her. She believes that she was spared reprisals due to the presence of her brothers, who were extremely protective and known for their willingness to engage in violence to protect themselves and their family. Her brothers were forced to flee the area, however, due to threats against them, leaving Maria unprotected. In part to buy herself some level of security, she entered into a relationship with a man, “Carlos,” but, unlike her brothers, Carlos did not intimidate Julio, who routinely confronted and threatened to kill both of them. During one of the confrontations, Julio brandished a firearm but ran off when passersby entered the area.

Carlos eventually fled to escape Julio’s threats, which left Maria unprotected once again. She relocated to another community with her only other family members, and Julio began threatening her parents to disclose her whereabouts. Her parents did not disclose the information, but he obtained information on Ma-

ria’s whereabouts through other sources—presumably through coercion—and began to harass and threaten her in the new community. Julio renewed his threats to kill her, so lacking any other internal relocation option and knowing that she could not seek police or other government assistance without putting herself and her family at greater risk, Maria fled Honduras. Julio continues to contact her parents saying that he will kill her if she returns and that he will use his police contacts to locate her within the country. He reiterates his belief that he has impunity to do as he wishes as neither the police nor other agents of government will act to protect Maria or prosecute him.

Guatemala

As background to any discussion of violence against women in Guatemala, it is critical to understand the historical and socio-political context of gender relations and misogyny within which the problem exists. Between 1960 and 1996, Guatemala was ravaged by brutal civil war. According to the *Comisión de Esclarecimiento Histórico*—CEH (Historical Clarification Commission)—the post-war U.N. truth and reconciliation commission, 200,000 people were killed during the conflict, and approximately 50,000 of the victims were women; a significant percentage were raped, tortured, and/or mutilated.²⁸ A high percentage of the victims—if not the majority—were Mayan and were targeted as part of the government’s “Scorched Earth” strategy. The CEH concluded that government actions against Mayan females were part of a larger strategy of genocide. Peace accords were signed in 1996, but a cultural legacy of violence against women had been established that has not only not improved since the conclusion of the war but also worsened substantially.

Although the effects of under-reporting, nonstandardized definitions, and poor statistical practices make it impossible to ascertain with certainty the number of victims, it is known that over 5,000 women and girls were murdered between 2000 and 2009—many of whom were victims of femicide.²⁹ Of the 4,300 reported cases of violent death among women between 2000 and 2008, prosecution occurred in only 2% of cases.³⁰

In 2008, the Guatemalan legislature approved the *Ley Contra Femicidio y Otras Formas de Violencias Contra Mujeres* (Law Against Femicide and Other Forms of Violence Against Women). Impunity did not improve in subsequent years; in 2011, the percentage of cases referred to the courts that resulted in a judgment was less than 3%.³¹ In 2012, the Inter-American Human Rights Commission admonished the Guatemalan courts for “creating an environment conducive to the chronic repetition of acts of violence against women.”³²

The problem of violence against women is so pervasive that the United Nations *Comisión Internacional contra la Impunidad en Guatemala* (International Commission against Impunity in Guatemala) has taken up the issue. Moreover, because of the rampant nature of the problem, in 2009, the U.N. also decided to base its international effort to end violence against women in Guatemala. The U.S. Congress also recognized the gravity of the situation as far back as 2006, when 117 members signed a letter demanding that the State Department allocate additional funds to support justice for women and human rights defenders.³³ The House and Senate also passed resolutions in May 2007 and March 2008 calling for Guatemala to address the issue of femicide and for the U.S. government to support those efforts.³⁴

Despite U.S. and international pressure, Guatemalan governmental action to date has failed to contribute to a cultural shift regarding violence against women, substantially change police response, meaningfully improve rates of prosecution, or result in offenders being held legally accountable. The United Nations, the U.S. government, and domestic and international women’s and human rights groups continue to condemn the government’s ambivalence and unwillingness to confront the problem in a significant and proactive manner.

The problem of intra-familial sexual violence against female children and adolescents is particularly troubling. In 2014, 5,100 pregnancies involving girls under age 14 were reported, up from 4,354 in 2013,³⁵ and, given the nature of rural life in Guatemala, in which communities are isolated and oftentimes not

connected to the government in any meaningful way, the number was likely to have been much higher. According to government statistics, in 2012, 90% of cases of pregnancy among girls under age 14 involved abuses committed by fathers, uncles, or cousins, and, despite the passage of new legislation, the state continued to downplay, or ignore almost completely, these abuses; as noted previously, that same year, of the more than 2,000 cases of child sexual assault reported to authorities, only eight resulted in a conviction.³⁶ As may be predicted, the problem is most extreme among uneducated and indigenous children and adolescents.

Case Profile: “Antonia”

Antonia is Mayan and lived in a small, primarily Mayan community. Her parents had entered the U.S. and left her in the care of her elderly grandparents. Not far from the village lived a relatively wealthy Ladino (non-indigenous Guatemalan) man known for his disdain for the Mayan population. He began confronting Antonia saying that she was little more than an animal and that as a Mayan female she had no rights, he could do as he wished with her, and the police would never do anything to intervene. He also repeatedly said that she had no “man” to protect her.

At one point, he attempted to rape her, and, in the aftermath, she sought medical assistance at a clinic. Due to a lack of confidentiality and professionalism, clinic workers spread details of the assault to others in the community, and her attacker’s adult children learned of the incident and began threatening Antonia, saying that she had seduced the father and would be “disappeared” (a euphemism for being abducted and killed and never seen again) if she sought police assistance. At the same time, her assailant began stalking and threatening to kill her because he blamed her for the fact that the attempted rape became known to his family.

After the incident became known publicly, Antonia found herself being ostracized by members of the community, including her grandfather, who felt that she brought shame to the family. She knew from experience that police seldom, if ever, acted on behalf of members of the Mayan community who sought assis-

tance and knew that it was unreasonable to presume that they would take action under any circumstance against a wealthy Ladino accused of sexually assaulting a Mayan female.

Lacking the family support necessary to survive in her small community and being socially ostracized, Antonia relocated to Guatemala City, but, as an immediately recognizable young Mayan female with no protective family network, gang members began subjecting her to racial slurs and threats of sexual violence. Terrified, she lived as a prisoner in the home to the greatest degree possible but was forced to leave to work, shop, etc. At one point, several gang members attempted to drag Antonia into a vacant house. Her Spanish-language ability is limited, but she understood enough of what they were saying to realize that they intended to rape and kill her so that she was not able to report the incident to police. She was able to escape when police happened by, but since the gang members knew who she was and where she lived, she knew that she could no longer remain in the neighborhood. She fled to another country in the region and began wearing nontraditional clothing in order to reduce her visibility as a Mayan and increase the possibility of integrating into another society.

GANG CULTURE AND VIOLENCE AGAINST WOMEN

The link between gangs and violence against women is rooted in the fact that females are highly devalued in gang culture and that gang members rationalize gender-based violence using the same cognitive framework (i.e., gang mentality) as is used to justify other expressions of gang violence. Gang mentality rationalizes and promotes the use of violence for a number of reasons. One of the most significant reasons, central to gang mentality itself, is that the bravado and audacity that accompany violence bolsters individual gang members' self-image of toughness and invincibility and the reputation of the gang as a whole.

In societies that generally perceive females as weak and inferior, it is critical that gang members ensure that they are recognized as dominant over women as to do otherwise would be ruinous to their self-image and

standing with other gang members. As such, in countries with some of the highest rates of violence against women in the world, gang members tend to be the most hyper-masculinized of the hyper-masculinized and arguably the most violent.

The hyper-masculinity that characterizes gangs is reflected in their very structure, which obligates members to repress "their women" into complete submissiveness so as not to "*botar el plante*" (ruin the image) of the gang. Gang members are beaten if they do not control "their women" or allow them to demonstrate any form of "disrespect," such as raising their voices at them in public, defying their directives, or otherwise standing up to them. To illustrate, one of the authors is familiar with a situation in which a gang member was killed by members of his own *clica* (individual gang cell) because, after beating "his woman," he failed to "control her" and she called the police. Officers responded to the house, and the gang held him responsible for bringing police into the neighborhood and murdered him both as "punishment" and to convey a message to other members that failure to effectively control "their women" would result in reprisals. The gang also threatened the victim with death, forcing her to flee the country.

In addition to asserting their general dominance over women, gangs also employ violence against them to (1) "punish" those that have fallen into disfavor, (2) indirectly punish males that have been targeted for harm by victimizing the girls and women whom they care about, and (3) convey a message to the community at-large that there is no limit to their audacity and willingness to engage in barbarism. With respect to this final point, it is critical to note that violence against women is a critical element of the strategy of terror through which gangs establish and maintain control over physical territory, criminal markets, and the population itself, and women are targeted for reasons that advance that strategy.

While not exclusively the case, the dangers are particularly high for "unprotected" females, i.e., those outside of protective, male-dominated relationships. In the patriarchal cultures of El Salvador, Honduras, and Guatemala the presence of a robust and engaged male

in a young girl's or woman's life (e.g., father, husband, boyfriend, or other actively involved adult male family member) is a powerful protective factor whereas the absence of such a protective male presence is an equally powerful risk factor. Stated most succinctly, females outside the umbrella of such a relationship are highly recognizable within their communities, perceived as "unprotected" and viewed by gang members as "low hanging fruit."

After having threatened or subjected a woman to physical and/or sexual violence, she is at exponentially higher risk of future victimization as compared to those with no such history of threats or abuse. In part, the risk of future victimization arises from gang members' perceptions women as "property" of the individual member or, at times, the gang as a whole. In some instances, this notion of "property" is conveyed through the terms "*jaina*" and "*morra*," gang colloquialisms that reflect gang members' sense of ownership over females as human beings—"chattel" with no rights or authority.³⁷

Defying gang members' demands to enter into sexual or romantic relationships or act in service to the gang or attempting to leave existing relationships are perceived as challenges to their position over women that require not only a punitive response but also one that is visible to other gang members and often members of the public as this demonstrates and reinforces their dominance over females.

Women claimed as property are forced to engage in criminal activity on behalf of the gang, including (1) transporting drugs and firearms, (2) delivering extortion demand letters and collecting extortion payments, (3) providing information on gang rivals and police, (4) setting up robbery and kidnapping victims, and (5) smuggling contraband into prisons. Ironically, while gangs exhibit the most extreme misogynistic views and see females as largely without value, they rely heavily upon them as women play a critical role in propping up gang culture and supporting—albeit oftentimes through coercion—gangs' financial viability.

When young girls and women are arrested as a result of these coerced activities, they are frequently mur-

dered by the gang in order to both "punish" them for getting caught and/or ensure that they do not disclose information to authorities. In those rare cases that girls and women do seek government assistance, they are often advised not to press charges because the risks associated with doing so are greater than acquiescing to the ongoing abuse.

Women forced to transport drugs into the prisons may also be at medical risk. According to one informant, women risk the drug packets exploding in their stomachs as they wait to be admitted into the prisons, where they have been instructed to vomit up the packets and turn them over to gang members.³⁸ She cited a case in which a young woman was hospitalized after a drug balloon exploded in her stomach; the woman is now 20 years old and has a colposcopy bag that she will be forced to use for the rest of her life because her intestines were destroyed by the drugs.

Once women enter into relationships with gang members, whether they are coerced or do so of their own volition, they are not only perceived as "property" but also subjected to tests of loyalty. For instance, gang members often arrange for their associates to contact their girlfriends by phone, by text, or in person and attempt to engage them in conversation or to ask them out for an innocent walk or a meal. If the young girl or women engages in the conversation or agrees to go out with the gang member who made the contact, she will be beaten, oftentimes raped, and potentially murdered. If their boyfriends or husbands are incarcerated, females are tested by the detainees' gang associates in the community and often monitored constantly. Even when gang members receive long sentences—including life sentences—they prohibit their "partners" from interacting with other men, and, if they violate the orders to remain loyal, this will result in horrific violence. In the event that gang members are killed, their female partners are often forbidden from having relationships with other men for a period of several years in order to show their loyalty to their deceased partner. Should they violate this order, they are killed, often after being violently gang raped.

Even in situations where gang members have no interest in maintaining relationships with women, they

still typically refuse to allow them to leave as doing so would be perceived as an acknowledgment that they possess a measure of autonomy and an authentic self. For women who do escape relationships, they are generally forced to live as prisoners in the home or go into hiding. It is critical to note that, for women who do go into hiding and are able to escape reprisals, the passage of time does not typically translate to a diminished likelihood of retaliation and, in fact, it may actually increase the risk if later located because allowing them to escape would cause gang members to be perceived as weak, thereby necessitating a punitive response in order to rehabilitate abusers' images.

It is also critical to note that females not only are targeted as *jainas* or for coerced service to gangs but also are simply abducted, gang-raped, and often held for days at a time before being thrown to the street in a state of physical, emotional, and psychological ruin. Many young girls are abducted while engaging in activities of normal life, such as walking home from school or their friends' homes, the store, or church.

The most extreme example of gangs' barbarism involves "torture rape." Beyond the trauma of a typical rape, "torture rape" involves extremes of cruelty and multiple assailants and often ends in the murder and dismemberment of the victim. A Salvadoran criminologist reports that women are often penetrated with glass bottles after which gang members jump on their stomachs in a twisted "game" to see who will cause the bottle to break inside of the women, causing massive bleeding.³⁹ Gangs employ these types of hideous tactics to "punish" women and those with whom they are associated and to reinforce their strategy of terror.⁴⁰

While male gang members often have multiple partners, each of which is subject to the tests of loyalty described above, *jainas* are prohibited from associating with males who are not members of the gang as women are perceived to be "*de lengua larga*" (long-tongued) in the sense that they may disclose information about the gang or act as "snitches." Should they ignore this rule, they may be beaten or killed.⁴¹

Case Profile: Sandra

Sandra was abandoned by her parents during infancy and forced to begin doing "favors" for the gang at the age of nine after having been raped by four of its members and witnessing the murder of her older brother, who was involved with the gang and her only source of support. As often occurs when a gang member is killed, members of his family may be coerced into service in order to maintain the family connection to the gang or prevent family members who may have "too much knowledge" about the gang from escaping or providing information to law enforcement or aligning with members of a rival gang. Sandra was that person.

Over the course of the next several years, Sandra was raped by more than 15 men. At the age of 24, she escaped from the gang, but she, her young child, and a teenage family member were kidnapped and put in front of a tribunal of armed gang members who attempted to intimidate her back into service to the gang. She refused, released, and told to await a decision once her abductors consulted with higher authorities in the gang.

Recognizing the inevitability of violent reprisals and near-certain death, Sandra sought support from the IDHUCA (Institute for Human Rights) at the Jesuit University of Central America in the wake of the kidnapping. After an extensive interview that itself was re-traumatizing and a protracted wait, Sandra was informed that, per IDHUCA policy, she was not eligible for assistance due to her ties to the gang despite the fact that her participation was coerced under threat of death beginning in childhood and that she was horrifically victimized by gang members during the years that she was associated with them.

Case Profile: Lidia

At the age of 15, Lidia was forced to begin visiting a high-ranking gang member in prison. She spent the next six years being forced under constant threat of death to visit him and lived in social isolation and sexual slavery. She described herself as his "trophy," which he kept isolated so that it would never get tainted. He ordered that gang members in the com-

munity stand guard over her house and monitor her movements. She was prohibited from engaging in other social relationships, and was beaten on multiple occasions for not answering his phone calls from prison that came in while she was using the bathroom or had left the phone elsewhere in the house.

During forced prison visits, Lidia endured constant psychological, physical, and sexual violence and humiliation. She often left the prison bruised and battered from the abuse but was forced to return the following weekend. At one point, after she attempted to escape, a member of her family was kidnapped and tortured in order to coerce her into returning, which she did to prevent further harm to her family. When the police conducted a sweep of her neighborhood, Lidia was arrested for “illicit association” because she was known to be associated with the gang and spent nearly two years in prison awaiting trial, after which time she was acquitted and released, but the gang forced her to return to her life of slavery.

At one point, Lidia fell in love with a young man from another community. When she realized that she was pregnant with his child, she contemplated suicide, knowing that she would be tortured and killed by the gang as soon as her pregnancy was discovered. The couple had decided that, if the gang members discovered that they were together, they would commit suicide to avoid being tortured and murdered.

Lidia and her partner decided to escape and go into hiding. They sought assistance from a nongovernmental organization working with internally displaced persons but waited for months with no response. As they were in hiding and waiting for assistance, the couple received word that the gang would kill both of them when they were located, and shortly thereafter they narrowly escaped a kidnapping attempt after their whereabouts was discovered. They fled the country in order to save the life of their child, who was due to be born, and are now struggling to survive as their meager funds have run out and the shelter where they currently reside does not provide food. Their family members were also forced to flee their communities to avoid reprisals from the gang and are currently displaced internally and living with the fear of being lo-

cated and tortured in an attempt to coerce them into revealing the couple’s whereabouts.

GOVERNMENTAL RESPONSE

Despite the horrific outcomes associated with gang culture and violence against females, the phenomenon has been lost within the larger issue of violence. The irony is that, while gender-based violence within gang culture is an ignored dimension of the larger problem of gang violence, it is fully recognized by authorities and the public. Parents withdraw their daughters from school due to fear of them being abducted, gang raped, turned into sex slaves, and murdered; police and members of the public routinely encounter the remains of young females who have been dismembered with machetes by gang members; teenage girls travel in packs in hopes of minimizing the risks; and many live as prisoners in the home and only venture out in the presence of adult family members.

One of the most egregious elements of governments’ response to gangs and violence against females is the criminalization of its victims. To illustrate, a source known to the authors who had been held in sexual slavery for several years and forced to smuggle drugs into a prison advised that she observed at least one woman a week being arrested for bringing contraband to incarcerated gang members after being coerced to do so. When arrested as a result of this coerced activity, women are often fully prosecuted—despite the fact that authorities know that they and their families had been threatened with death if they fail to comply. According to an anonymous source in the Salvadoran Supreme Court, the justice system logic is that the person is held responsible for the “act” and the circumstances under which the “act” occurred are not taken into consideration. Young women not only end up with multiple-year prison sentences but also may lose access to their children during their incarceration or lose them to state custody.

The practice of prosecuting women coerced into service to gangs is well illustrated in the case of El Salvador. In 2015, the government declared gangs “terrorist organizations” and imposed “extraordinary measures” in 2016 as part of an effort to regain control

of gang-controlled prisons and detain or kill gang members still in the community. As part of this larger set of actions, the government began going after “gang apologists” and “collaborators,” including females who are forced to transport drugs and other contraband into prisons or who engage in criminal activities on the street.

The practice of targeting “gang apologists” and “collaborators” reflects a “black and white” mentality around issues that are defined by shades of gray, which, in the best-case scenario, results in young women being stigmatized and abandoned by the state. In the worst-case scenario, the state becomes a secondary victimizer. In addition to being prosecuted for crimes that they were forced to commit, young women coerced into criminal activity are also at high risk of violence from the police, who perceive them as willing collaborators with the gang and subject them to harassment, threats, arrest, and sexual violence.

The Salvadoran government’s position on “gang apologists” and “collaborators” has also created a situation in which social service agencies are reluctant to provide support to anyone who may be deemed as supportive of gangs because they can be harassed and jailed for supporting a “terrorist organization.” Individuals engaged in religiously based efforts—who are often the only people providing services in gang-affected communities—are also fearful; the authors are aware of over 30 clergy members that have been harassed by authorities because they were perceived as “gang apologists.” In an extreme example, human rights activist Dany Garcia, who documented 140 cases of alleged police torture and extrajudicial killing in El Salvador, was incarcerated in July 2016 after being accused of being a “gang apologist.”⁴² As such, women with coerced associations with gangs who attempt to escape are, as matter of policy or due to fear of reprisals, denied access to social services, shelters, and/or assistance seeking asylum.

THE POLITICAL CONTEXT OF VIOLENCE: IMPLICATIONS FOR GIRLS AND WOMEN

The gender dynamics expressed within gang culture

and by the governments of the Northern Triangle are directly related to the region’s tortured history of civil conflict and the terror associated with it. El Salvador and Guatemala both experienced protracted civil wars. In the case of El Salvador, the war raged from 1980–1992, in Guatemala, 1960–1996. The Honduran population was subjected to extreme repression and violence during the “low-intensity conflict” that dragged on for many years while the neighboring countries were hemorrhaging under full-scale civil war.

During this protracted period of civil war and unrest, politically motivated atrocities, including arbitrary arrests, torture, “disappearances,” and massacres, were key components of a strategy to shape the sociopolitical landscape through the use of terror. Hundreds of thousands were subjected to horrific abuses and murdered, and the consensus internationally is that the vast majority of atrocities were committed by military, paramilitary, and police apparatuses. Within this context, gender-based violence represented a central pillar in these strategies of terror.

Upon conclusion of civil conflicts, many combatants—both governmental and guerilla—who suddenly found themselves unemployed and living in societies with shattered social and economic infrastructures began leveraging war-era contraband, intelligence, and logistics networks in order to facilitate the development of new types of criminal organizations.⁴³ Critically, these emerging post-war criminal organizations adopted the same strategies of terror that were employed during the era of civil conflict to create a sociopolitical climate in which they enjoyed relative impunity to expand and to operate criminally.

As far back as 2009, analysts from the U.S. Army War College and the Strategic Studies Institute characterized Central American gangs and organized crime groups as “non-state actors” engaged in efforts to establish political domination through “asymmetrical warfare.”⁴⁴ This observation is consistent with many analyses conducted since that time and have been supported by officials of the Northern Triangle countries.

Through the use of terror, Central American gangs and organized criminal groups have now effectively

rendered the state and its agents (e.g., police, prosecutors, courts, prisons) irrelevant in major respects and act as de facto governments in many areas because they have so thoroughly undermined the state's capacity to fulfill basic functions of governance. According to a 2016 study, across measures of influence on the politics, economy, and culture, gangs represent a "parallel state" in which they exert pressure on the government in the manner of an "interest group." Rather than using political connections and financial inputs to shape the political process, gangs use terror and violence.⁴⁵

As opposed to simply a manifestation of their misogynistic views, gangs also employ violence against women for strategic purposes—it is a weapon of war, just as gender-based violence was a weapon of war during the era of civil conflict.

It was not only gangs and other organized criminal groups that drew upon brutal civil war era tactics, however, but also governments. The militarization and criminalization of gang-affected communities that is observable today is a repackaging of the government tactics employed in the past, when terror was adopted as the principal strategy for silencing forces opposed to government and traditional power holders. As opposed to political dissidents, the targets of today's government repression are gang members, "gang apologists," and "collaborators."

It is also imperative to recognize the way in which the Central American governments have politicized the situation. An exhaustive analysis of the politicization of the gang problem is well beyond the scope of this *Briefing*, but for years the Northern Triangle governments, with active support from some media outlets, have manipulated the problem in order to shore up support within their traditional bases and to undermine opposing political parties. To illustrate, in 2009, when then-Salvadoran President Mauricio Funes of the *Frente Farabundo Martí para la Liberación Nacional*—FMLN (Farabundo Martí National Liberation Front) declared the government's *Mano Dura* (heavy-handed police-military suppression-repression strategy) policy a failure, he proposed a set of comprehensive alternatives to the country's approach. This

initiative was applauded internationally by gang specialists and human rights advocates, but, in order to stir up its base and leverage the public's demands for perpetual incarceration and extrajudicial killing of gang members, President Funes' chief political rivals, *La Alianza Republicana Nacionalista*—ARENA (National Republican Alliance)—went on the attack, politically pummeling him over what they characterized as his "get soft on crime" approach. The ARENA attack occurred despite the fact that *Mano Dura* was clearly recognized as a failed policy and one that by all accounts actually worsened the very problem that it was intended to solve.

To this day, despite its well-documented failures, the Salvadoran, Honduran, and Guatemalan governments remain wedded to *Mano Dura*, and attempts to promote alternative strategies, particularly at a national level, are eschewed and viewed as political suicide.

Insofar as it relates to violence against females perpetuated by gangs and by the state, these political dynamics are critical and in fact contribute directly to the problem.

THE NATURE OF COMMUNITY LIFE IN THE NORTHERN TRIANGLE AND INTERNAL RELOCATION

For a number of reasons, internal relocation is not generally a viable alternative for females targeted for gang violence. First, community life in El Salvador, Honduras, and Guatemala is defined by overlapping family-social networks, frequent social interaction, and the population's fixation on knowing who is in the social environment. Together, these factors make it virtually impossible for individuals to relocate to a new neighborhood or small community without being immediately recognized as newcomers. Also, because of the communication that naturally occurs between family and friends living in other areas of the countries, these overlapping family-social networks oftentimes ensure that news of an individual's or family's presence in a new area will soon be communicated back to their former community. When this occurs, the individuals whom the victim has fled from become aware of the victim's whereabouts and can easily travel to

the new community or mobilize their criminal associates in that community to renew or initiate threats against him or her.

Second, gang members are obsessive about knowing who lives and moves within territories under their control and are aware of virtually everything that occurs within those areas. *Postes* (lookouts) are stationed at the entrances to gang-controlled neighborhoods with cell phones at the ready and immediately call designated points of contact when strangers enter into those areas. Gang members' obsession with knowing who is in areas under their control is so extreme that they often erect roadblocks to stop and identify those coming into the neighborhoods or force residents of those areas to engage in identifying behaviors (e.g., particular use of headlights on their vehicles) so that outsiders can be more easily identified. Strangers are predictably confronted to determine who they are, where they are from, and why they are there, including demands that they display their identification.

Third, gangs have well-established communication networks throughout their respective countries. When a stranger enters into a gang's territory, after being confronted and identified, gang members routinely contact their associates in the individual's home community to determine whether the gang "has business" with the individual. For a person hoping to avoid threats in one community by fleeing to another, this entirely undermines those efforts.

Finally, social, cultural, and economic factors typically make it difficult for anyone to relocate internally, but, depending on their particular situation, it may be virtually impossible for females. Specifically, unless women have an intact family network in their new community that is able and willing to provide physical security, economic support, and housing, relocating to another area to escape threats and violence cannot generally be considered a viable alternative. Even if women do have those types of supports, the aforementioned variables may still make it impossible for them to relocate safely. For women attempting to relocate internally to areas in which they have no supportive and protective family network is, at best, trading the risk in the home community for similar risks in the

new area as they are immediately recognized as "unprotected" females and at risk from gangs, sexual predators, abusive police, and, potentially, labor market abusers.

CONCLUSION

Within societies characterized by rampant violence against women and relative assurances of impunity for male offenders, none are at higher risk than girls and young women targeted by gangs. As individuals, gang members are the most hyper-masculinized of the hyper-masculinized, and this mindset of extreme misogyny represents a fundamental tenet of gang culture and mentality. It is, in fact, not only part of the backbone of gang culture but also a central element of gangs' strategy of terror through which they establish control over physical territory, criminal markets, and the population itself. Moreover, gangs' strategy of terror, including violence against women, represents a means through which they gain influence over the government and public policy.

As each of the case profiles illustrate, females who "belong" to the gang are victimized on multiple levels. They are essentially victims of modern-day slavery and subject to social isolation, beatings, extreme sexual violence, coerced involvement in criminal activity, and death. They are subjected to secondary victimization by the state both in terms of criminal prosecution for actions that they were forced to engage in under threat of torture and death to them and their families and also subjected to abuses at the hands of police, including sexual violence. When they do seek government assistance, they encounter ineffective, underfunded, and oftentimes corrupt institutional structures that are unresponsive to their needs as victims. Moreover, they are often denied government and social service assistance when they attempt to escape the control of gang members because they are perceived as "collaborators" rather than victims, which makes them and their children ineligible for even a modicum of support or assistance.

ENDNOTES:

¹Violence against females has been extensively

documented by domestic and international sources, including the United Nations, a myriad of governmental and nongovernmental organizations, human rights monitoring groups, and the international media.

²Guatemala's Femicide Law: Progress Against Impunity? The Guatemala Human Rights Commission, Washington, D.C. (May 2009), available at http://www.ghrc-usa.org/Publications/Femicide_Law_ProgressAgainstImpunity.pdf.

³U.N. News Centre (July 10, 2014), available at <http://www.un.org/apps/news/story.asp?NewsID=48241#.WKHy1RDURyu>.

⁴Id.

⁵The Advocates for Human Rights (July 2016), available at http://www.theadvocatesforhumanrights.org/el_salvador_-_committee_on_the_elimination_of_all_forms_of_discrimination_against_women_-_violence_against_women_-_july_2016.

⁶Vivimos en el País más Violento Contra las Mujeres, La Pagina (Oct. 14, 2011), available at <http://www.lapagina.com/sv/nacionales/56989/mujeres-asesinatos-El-Salvador->

⁷El Salvador Sees Epidemic of Violence Against Women, InSight: Organized Crime in the Americas (May 23, 2011), available at <http://www.insightcrime.org/news-analysis/el-salvador-sees-epidemic-of-violence-against-women>.

⁸Aumentan Homocidios de Mujeres esta Año, El Salvador.com (Mar. 28, 2014), available at http://www.elsalvador.com/mwedh/nota/nota_completa.asp?idCata=47859&idArt=8666047.

⁹El Salvador: Nuevo patrón de violencia, afectación territorial y respuesta de las comunidades (2010-2015), Instituto Centroamericano de Investigaciones para el Desarrollo y el Cambio Social (INCIDE) (August 2016).

¹⁰Report of the Special Rapporteur on violence against women, its causes and consequences, Rashida Manjoo: follow up mission to El Salvador, United Nations (Feb. 14, 2011), available at <http://www.refworld.org/docid/4ef1a8ae2.htm>.

¹¹Amnesty International Report 2014/15: The State of the World's Human Rights, Amnesty International (Feb. 25, 2015), available at <https://www.amnesty.org/en/documents/pol10/0001/2015/en/>.

¹²For reasons of security, the sources requested anonymity.

¹³For a review, see Asamblea Legislativa,

República de El Salvador, available at <http://www.asamblea.gob.sv/eparlamento/indice-legislativo/buscar-de-documentos-legislativos/ley-contra-la-violencia-intrafamiliar>.

¹⁴Abuso Sexual de Niños y Violencia Contra Mujeres Persisten en CA, EFE (Feb. 25, 2009), available at <http://www.radiolaprimerisima.com/noticias/resumen/48148>.

¹⁵El Salvador: Violence against women, legislation and the protection offered to victims (2007 - June 2009), Canada: Immigration and Refugee Board of Canada (July 13, 2009), available at <http://www.refworld.org/docid/4a7040b92.html>.

¹⁶For a review, see Asamblea Legislativa, República de El Salvador, available at <http://www.asamblea.gob.sv/eparlamento/indice-legislativo/buscar-de-documentos-legislativos/ley-especial-integral-para-una-vida-libre-de-violencia-para-las-mujeres>.

¹⁷For reasons of security, the sources requested anonymity.

¹⁸Ley de Protección Integral de la Niñez y Adolescencia, available at <http://www.asamblea.gob.sv/eparlamento/indice-legislativo/buscar-de-documentos-legislativos/ley-de-proteccion-integral-de-la-ninez-y-adolescencia>.

¹⁹As with each of the case profiles in this article, the names have been changed, and the facts blurred to prevent recognition of the victims.

²⁰The killing of women in Honduras has been widely covered in the international media and by various human rights monitoring organizations, and the figure of 3,000 deaths is consistently cited by each of these sources.

²¹Special Rapporteur on violence against women finalizes country mission to Honduras and calls for urgent action to address the culture of impunity for crimes against women and girls (July 7, 2014), available at <http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=14833>.

²²Honduran Police Turn a Blind Eye to Soaring Number of Femicides, The Guardian (May 28, 2011), available at <http://www.guardian.co.uk/world/2011/may/29/honduras-blind-eye-femicides>.

²³Special Rapporteur on violence against women finalizes country mission to Honduras and calls for urgent action to address the culture of impunity for crimes against women and girls (July 7, 2014), available at <http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=14833>.

²⁴For a transcript of the law, see *Ley Contra la Violencia Doméstica y sus Reformas*, Instituto Nacional de la Mujer, available at <http://pdba.georgetown.edu/Security/citizenssecurity/honduras/leyes/1.pdf>.

²⁵Special Rapporteur on violence against women finalizes country mission to Honduras and calls for urgent action to address the culture of impunity for crimes against women and girls (July 7, 2014), available at <http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=14833>.

²⁶Honduras: Domestic violence; legislation and protection available to victims (2007-2009), Immigration and Refugee Board of Canada (Jan. 13, 2010), available at <http://www.unhcr.org/refworld/docid/4b7cee7c26.html>; “Honduras,” 2008 Country Reports on Human Rights Practices, Department of State (Feb. 25, 2009), available at <http://www.state.gov/g/drl/rls/hrrpt/2008/wha/119164.htm>.

²⁷Country Reports on Human Rights Practices for 2014, Department of State, Bureau of Democracy, Human Rights and Labor (2014), available at <https://www.state.gov/j/drl/rls/hrrpt/2014humanrightsreport/index.htm#wrapper>.

²⁸Menoria de Silencio, United Nations Office of Protective Services (June 1999).

²⁹Guatemala’s Femicide Law: Progress Against Impunity? The Guatemala Human Rights Commission, Washington, D.C. (May 2009), available at http://www.ghrc-usa.org/Publications/Femicide_Law_ProgressAgainstImpunity.pdf.

³⁰Id. Central America Women’s Network, #24 (Spring 2009), available at <http://www.cawn.org/html/spring09%20version%20website.pdf>.

³¹Musalo and Bookey, Crimes Without Punishment: An Update on Violence Against Women and Impunity in Guatemala, *Hastings Race and Poverty L.J.*, Vol. 10, pp 265-92 (September 2013).

³²Id.

³³Help End Violence Against Women in Guatemala, Center for Gender and Refugee Studies, U.C. Hastings College of the Law, available at <http://cgrs.uc Hastings.edu/campaigns/femicide.php>.

³⁴Id.

³⁵Fathers Rape with Impunity, Fueling Guatemala’s Teen Pregnancies: Rights Group, Reuters (Oct. 2, 2015), available at <http://www.reuters.com/article/us-guatemala-teenage-pregnancy-idUSKCN0RW22D20151002>.

³⁶Id.

³⁷Information on females claimed as *jainas* or *morras* has been gathered through hundreds of interviews that the authors have conducted with girls and young women in El Salvador, Honduras, and Guatemala, including dozens who have been claimed as property, as well as representatives of governmental and non-governmental organizations, including police, human rights ombudsman, and women’s rights advocates.

³⁸The informant requested anonymity due to fear of reprisals.

³⁹Author interview, Juan Martínez (Jan. 18, 2017).

⁴⁰For a brief review of gender-based violence as an element of gangs’ strategy of terror, see El Salvador’s Horrifying Culture of Gang Rape, *New York Post* (Nov. 6, 2014), available at <http://nypost.com/2014/11/06/the-youth-are-theirs-el-salvadors-horrifying-culture-of-gang-rape/>. Note that, although this report focused on El Salvador, the principles apply equally in Honduras and Guatemala.

⁴¹For reasons of security, the source requested anonymity.

⁴²The Accused, *The Intercept* (Aug. 8, 2016), available at <https://theintercept.com/2016/08/08/the-us-government-accused-a-salvadorian-human-rights-activist-of-gang-activity-now-hes-in-jail/>.

⁴³Farah, *Organized Crime in El Salvador: Its Homegrown and Transnational Dimensions*, Woodrow Wilson International Center for Scholars, Latin America Program (Feb. 2011), available at <https://www.wilsoncenter.org/sites/default/files/Farah.FIN1.pdf>; Report on the Americas # 29 (September 2011), p. 104; López, *Guatemala’s Crossroads: The Democratization of Violence and Second Chances* (Dec. 2010), available at <https://www.wilsoncenter.org/sites/default/files/Lopez.Guatemala.pdf>; Report on the Americas # 29 (September 2011), p.140.

⁴⁴Gray, *Gangs and Transnational Criminals Threaten Central American Stability*, U.S. Army War College, Carlisle Barracks, PA (2009), available at <http://dtic.mil/cgi-bin/GetTRDoc?AD=ADA498136>.

⁴⁵La violencia Pandilleril y su Impacto en la Economía, la Cultura y la Política, Friedrich Ebert Stiftung (Dec. 14, 2016), available at <http://www.fesamerica.org/el-salvador/seguridad/details/La+violencia+pandilleril+y+su+impacto+en+la+econom%C3%ADa+la+cultura+y+la+pol%C3%ADtica.759.html>.