



Thesis for International Master in Sociology of Law

# Women Prosecuted for Terrorism in the Basque Country: Deconstructing Judicial, Media, and NGO Discourses from a Feminist Perspective

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## Abstract

This thesis aims to analyze how ‘women terrorists’ are produced as subjects by existing discourses (Foucault, 1986), such as those produced by the justice system, the media, or statements published by victims of terrorist organizations. Hence, the scope of this thesis comprises three case studies in which women took part in events that were—and, with nuances, continue to be—considered acts of political violence or terrorism. Two of these cases concern women who held important positions in the organization ETA<sup>1</sup> and the third regards a young woman (twenty-two years old when the event occurred) prosecuted for taking part in a conflict, specifically a fight in a bar. In the opinion of one sector of society, her actions were related to political violence, but to others, it was nothing more than a bar quarrel: the so-called Altsasu incident.<sup>2</sup>

Understanding how discourse produces subjects is relevant because it provides us with a point of view that reaches beyond discussions of representation and agency in order to understand how the subject of the “female” terrorist or “female” militant is constituted (Gentry & Sjoberg, 2015: 326).

In this regard, power and power relations from a Foucauldian perspective partially explain how power is gendered (Deveux, 1994: 224). According to Deveux, Foucault’s writing on power has a “certain heuristic value for feminists,” but she stresses that uncritical appropriations of Foucault’s concepts “erase women’s specific experiences with power” (Deveux, 1994: 224).

To counter power dominance, according to Foucault, there is resistance. However, if the existing dominance is rendered invisible by gendered bias, it is materially impossible to counter it. Without a feminist lens, we cannot substantively change the existing conditions of power relations (Lazar, 2007).

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<sup>1</sup> ETA stands for *Euskadi Ta Askatasuna*, which in Basque means “Basque Country and Freedom.” This organization was created in 1959 to fight for an independent Basque state in northern Spain and southern France. The Spanish government categorized ETA as a terrorist organization. In January 2011, ETA declared a permanent and “internationally verifiable” ceasefire.

<sup>2</sup> The Altsasu incident is a judicial case against eight young people from Altsasu, a small town in Navarre, Spain, for their involvement in a fight taking place on October 15<sup>th</sup>, 2016 at a bar. In this altercation, injuries were sustained by two off-duty Civil Guard officers stationed in the town and their girlfriends.

Gender is another system of oppression, more pervasive and complex than others (Eckert, 1989: 253-254 cited in Lazar, 2007: 143).

In this line of thought, from the point of view of epistemological feminism, gender is an ideological structure. Thus, understanding the production of subjects by analyzing *discourse* has value for laying bare the nuances of patriarchal stereotypes embedded in current society.

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## I. Introduction

### 1. The aim of this thesis. Delimitation of the study. Research question.

In recent decades, the feminist movement has brought about great improvements for women's rights across the globe. In this context, analyzing how society constructs a gender identity from a feminist perspective provides new tools for understanding long-established logic and the status quo, and helps identify ways to effect changes (Smart, 2000).

The aim of this thesis is to observe how women as perpetrators of political violence—often described as “terrorism”—can be constructed as subjects by existing discourses (Foucault, 1986) such as those produced by the justice system, the media, or statements published by victims of terrorist organizations. Hence, the scope of this thesis comprises three case studies in which women took part in events that were—and, with nuances, continue to be—considered acts of political violence or terrorism. Two of these cases concern women who held important positions in the organization ETA, and the third case regards a woman who was prosecuted for taking part in a conflict, specifically a fight in a bar. In the opinion of one sector of society, her actions were related to political violence, but to others, it was nothing more than a bar quarrel: the so-called Altsasu incident.<sup>3</sup>

There is a gap in the relevant literature regarding how women who are somehow linked to terrorism are prosecuted and convicted. This gap refers to the lack of research that explores whether there is a form of punitive power<sup>4</sup> related to gender in sentencing. According to Corcoran (2006), the criminological theories that have addressed women's criminality are based on biological theories, such as those posed by positivist criminologists like Cesare Lombroso in *Criminal Man* (1876) and *The Female Offender* (1895), in which women were categorized according to gender stereotypes. According to this school of thought, women

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<sup>3</sup> The Altsasu incident is a judicial case against eight young people from Altsasu, a small town in Navarre, Spain, for their involvement in a fight taking place on 15 October 2016 at a bar in which two off-duty Civil Guard officers stationed in the town and their girlfriends sustained injuries.

<sup>4</sup> Punitive power refers to the faculty that State has to apply convictions to those who commit conducts that are forbidden in the criminal code. In Spain there is a common Criminal Code that regulates which conducts are not allow, and if a person commits them, it establishes the amount of punishment and in which modality (inhabilitation, fine, incarceration).

criminals were markedly degenerate because the biological restraints of “piety, maternity, want of passion, sexual coldness and an undeveloped intelligence” were disregarded (Lombroso and Ferrero, 1985:110 cited in Corcoran, 2006: 65).

In the context of the feminist perspective in criminology, since the 1980s women offenders were contextualized in the margins of vulnerability (Corcoran, 2006: 76). This paradigm was characterized by understanding women offenders within a predominance of poverty, profound social marginality, and exposure to gendered violence (Heidensohn, 1985; Faith, 1993; Carlen, 1983, 1988, 1998 cited in Corcoran, 2006). These social elements had an explanatory function for women’s deviant behavior.

This perspective highlighted that women committed crimes with “patterns of offending [that] remain very different from that of men” and pose “lower levels of risk to the public” (Prison Reform Trust: xxi cited in Corcoran, 2006: 77). This argument shows that women who commit crimes involving a higher level of violence, such as crimes related to terrorism, are gendered within a patriarchal context.

Therefore, the element of additional punishment for terrorism-related crimes committed by women has not been addressed from a socio-legal perspective. In addition to their convictions, women who were part of ETA also suffered social castigation for having acted outside the boundaries of their gender roles (Checuti-Osorovitz, 2021: 226).

The aforementioned gap can be addressed by analyzing the production of the woman terrorist subject through *words*: narratives created by the criminal justice system (sentences), the media (news articles), and the victims of terrorist associations (statements) (Fairclough, 2012). All of these fall within a general premise of my research question: How do the discourses of the judicial system, the media, and victims’ organization produce ‘women terrorists’ as subjects? Do women who perpetuate political violence receive a double “conviction?” In what ways?

## 2. The Basque Conflict. Observing the background

During the various stages of the Basque Conflict, women experienced diverse roles. In order to understand them, I will refer briefly to the Basque Conflict itself, and later to the roles women occupied within it.

The Basque Conflict can be easily related to the concept of Motherland—*patria* in Spanish—because of its tradition in the Basque Country as a representation of identity (De Pablo, 2015). The notion that there is an entity that can be identified by every Basque citizen is an important part of the creation of Basque nationalism. According to De Pablo, the Basque people show a particular disposition to nationalism (2015), and this could be related to a strong feeling for identity when, after the last Carlist Wars in 1876, the Basque Country lost their *Fueros*.<sup>5</sup>

According to the main founder of the Basque Motherland, Sabino Arana, the Basque Country was a nation because it shared a history of its own, with particular institutions, laws, and customs. He was the founding father of the nationalist political party, the Basque Nationalist Party (PNV), and introduced the idea that he was not Spanish but rather Basque (de Pablo, 2015: 31). Basque nationalism also has elements of cultural identity, such as language. Euskera, or Euskara, is the most commonly spoken language in the area.

Following the Spanish Civil War (1936-39), Basque nationalism in all its expressions was repressed and prohibited (Hamilton, 2007a: 2). Francisco Franco's dictatorship (1939-1975) continued to repress any sign of regional nationalism in Spain. In order to preserve traditions, during the first twenty years of the dictatorship, family and the Church were the only spaces with some degree of autonomy from the Spanish state (Hamilton, 2007a).<sup>6</sup>

According to de Pablo (2015: 341), the final ten to fifteen years of Francoism came with economic growth and an improved standard of living, in addition to new waves of Spanish immigration to the Basque Country, all of which allowed

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<sup>5</sup> *Fueros* is a legal reference to the autonomy that the Basque provinces enjoyed.

<sup>6</sup> These spaces were out of reach of the Franco Dictatorship in a sense. This is why there exist a strong relationship among Church and Basque nationalism.

for the consolidation of the dictatorial regime. Even repression diminished in comparison to the post-war years.

During this period, the role of women mirrored the dichotomy of private and public spheres related to gender stereotypes. According to Carrie Hamilton's work, women participated in Basque Nationalism beginning in the 20<sup>th</sup> century: "women from urban, Catholic, middle-class Nationalist families associated with the PNV participated in public political activities that were considered a natural extension of their duties as wives and mothers at home: charitable works, teaching Basque language and promoting Basque culture' (Hamilton, 2007a: 2).

In 1958, the Basque Nationalist movement began to radicalize: a group of middle-class men, students, and Catholics from Basque Nationalist families (Letamendia, 1994 cited in Rodríguez Lara, 2017:428) expressed their concern about the threat Francoism represented for Basque identity. Within this context, ETA was born.

In July 1959, ETA's "*Manifiesto Fundacional*" was signed (De Pablo, 2015). ETA began as a political and cultural movement that centered its first actions on the political training of its members (Rodríguez Lara, 2017). Under the laws of Francoism, all these activities were forbidden and criminalized. Thus, there was a wave of detentions of ETA members in the early 1960s.

To counteract the detentions, ETA started to change their strategy into one of armed combat, inspired by national liberation movements in Algeria, Vietnam, Ireland, and Cuba. Among the following ETA publications, the narrative was centered on the idea of "resistance by all means, even, if necessary, by the use of violence and other means that might be considered immoral, but that in our situation are not" (de Pablo, 2015:361).<sup>7</sup>

From 1960 to ETA's ceasefire in 2011, there have been more than 800 deaths claimed by ETA as a consequence of their armed actions in combat. Most of

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<sup>7</sup> My translation. In Spanish, the original version reads as follows: "[R]esistir por todos los medios, incluso, si precioso fuere, por la violencia y por otros medios que podrían considerarse inmorales, pero que en nuestra situación no lo son."

these occurred between the Transition from Franco's dictatorship and the return to democracy in 1975.

### 3. Women in ETA. Participating in the liberation of the Basque Country as a path to women's liberation

Women have always participated in armed groups. The central question of this thesis is how their participation has been perceived. Gender stereotypes are applied to every aspect of women's lives. Hence, participating in a political organization is no exception. In the qualitative study conducted by Zuriñe Rodríguez Lara (2017), the researcher interviewed twenty-five women and six men in order to understand the conditions in which women were motivated to join an armed group. Her findings were that the incorporation of women into ETA was the result of diverse motivations related to social upheaval, repression, and the dream of an independent Euskadi (the Euskara name for the Basque Country). But there was also a need for those women to emancipate themselves from their gendered roles (Rodríguez Lara, 2015: 438).

Although I am not analyzing the gender dynamics that existed within the armed groups in this thesis, it is interesting to observe them in the given context. For example, *Etixerat* Association<sup>8</sup> and EPPK<sup>9</sup> report that there are currently 184 incarcerated ETA "terrorists". Of those, only twenty-seven are women.<sup>10</sup>

Since this thesis aims to understand and elucidate how women who commit acts of political violence are produced as subjects by the judiciary system, the media, and the victims of terrorist organizations, it becomes relevant to provide an overview of how scholars have studied the role of women in armed groups.

Throughout the history of the radical nationalist Basque movement and the resulting creation of ETA, women experienced different roles. As Carrie Hamilton

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<sup>8</sup> *Etixerat* is an organization that provides support and counseling for the families of political prisoners and fights for the return to the Basque Country of those affected by what are known as dispersion policies. These policies established that those convicted for crimes related to terrorism should be dispersed around the country for security reasons.

<sup>9</sup> EPPK, *Euskal Preso Politikoen Kolektiboa in Basque*, is the collective for Basque inmates.

<sup>10</sup> This information was retrieved from the website of *Etixerat* at <https://www.etixerat.eus/es/list/listado-de-presos-y-carceles/5> Last retrieve 09/06/2022.



observes, women were in charge of passing on knowledge of Basque culture within the family (Hamilton, 2007a). According to Hamilton, “early ETA rhetoric paid homage to a universal Basque Mother” (2007a: 3).

These women represented the support system for the *gudari*<sup>11</sup> as companions of those who actively participated in violent actions and were killed or incarcerated, or as their mothers or children (Aretxaga, 1988; Del Valle et al, 1985: 234-39 cited in Rodríguez Lara, 2017: 423). This was a fiction that idealized maternity. In fact, as Hamilton stresses, the majority of women who were nationalist activists in the 1960s were young, single, and childless (Hamilton, 2007a: 3).

Feminist scholars such as Rodríguez Lara (2017) and Sharoni (2005, cited by Rodríguez Lara) state that women were rendered invisible to academia as an object of study, as well as from society. This logic responds to the notion that the only type of subject women may be constructed as is victims because they are relegated to the private sphere, in opposition to the public sphere occupied by men (Chiarotti, 2006).

Gender normative discourses essentialize gender. Therefore, when a woman participates actively in an armed group, it is singular and abnormal (Gentry & Sjoberg, 2015). It represents an exception to the rule set by gender stereotypes (Rodríguez Lara, 2017: 425). The dichotomies of *private vs. public* and *women vs. men* produce subjects (Foucault, 1986) in this logic of submission. Any divergence will become an anomaly or even a monstrosity. Hegemonic masculinity is violent, as opposed to hegemonic femininity, which is peaceful *by nature*. There is a contradiction embedded in the idea that a woman cannot kill because she *gives life*. Therefore, a violent woman should be an oxymoron, as if the capacity to produce human beings were somehow contradictory to the capacity to exercise violence (Rodríguez Lara, 2017).

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<sup>11</sup> *Gudari* in Euskera translates as Basque warrior. An interesting distinction of Euskera is that, unlike Spanish, nouns do not carry gender specifications. Therefore, the genitive element must be clarified before the word *gudari*. This means that there can be women *gudari* as well as men. Those who fought during the Spanish Civil War were also *gudaris*. The term later referred to those who took part in ETA (militarily or politically).

These ideas prevail within the patriarchal logic of the gendered division of work (Chiarotti, 2006). Therefore, women who exercise violence are seen as monsters without humanity because they are simultaneously exercising violence and transgressing their gender roles (Gentry & Sjoberg, 2015).

In this sense, there are diverse sources for the production of these subjects as monsters. The judiciary system produces subjectivity through the judges' rulings. The media provides the words that will prevail in hegemonic narratives. The victims' statements will underpin the atrocity of the production of these subjects in opposition to them. The consequence of the production of these subjects is that they suffer an extra component of punishment. Men are supposed to be violent; not women. Therefore, women must be punished further for that further deviation.

This qualitative study aims to fill an existing gap when observing women as perpetrators of crimes related to political violence. As Chetcuti-Osorovitz states, "*la violence féminine ne saurait pas être politique*"<sup>12</sup> (2021: 225). In order to do so, I must first discuss the patriarchal power relations and the logics of domination that exist in the *discourses* analyzed here.

## II. Research design and methodology.

### 1. A case study method. Three cases to analyze through Critical Discourse Analysis (CDA)

Women as perpetrators of political violence—often termed “terrorism”—can be constructed as subjects by existing discourses (Foucault, 1986) such as those produced by the justice system, the media, or statements published by victims of terrorist organizations. Related to my research questions (how the discourses of the judiciary system, the media, and victims' organizations produce ‘women terrorists’ as subjects, whether who perpetuate political violence receive a double “conviction” and, if so, in what way) about the production of ‘women terrorists’ through these discourses, and the possible existence of an element of extra

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<sup>12</sup> My translation for more clarity: the violence perpetrated by women should not be political.

punishment in their convictions are key elements of my research. As a methodology to address these questions, I have chosen the case study. According to Robert Yin, this method aims to answer research questions related to “present circumstance(s)” regarding a social phenomenon (Yin, 2002).

In this thesis, my goal is to observe the social phenomenon of the production of ‘women terrorists’ as subjects. How are they produced? What are the main discourses that reproduce this (re)production of subjects? How can we characterize the discourses of the judiciary system, the media, or organizations for the victims of terrorism? The case study approach allowed me to focus on three particular cases—those of Marixol Iparagirre, Iratxe Sorzabal, and Ainara Urkijo—in order to understand the relevant phenomenon.

According to research conducted by the French author Natacha Chetcuti-Osorovitz, choosing a case to inductively understand a broader context is a useful tool (Chetcuti-Osorovitz, 2021: 222). She combines an ethnographic survey within the context of a *cas limite*. She explains that the *cas limite* operates as a case study from which she can build a global analysis from the singularity of one case.

Chetcuti-Osorovitz brings to bear the idea of Jean-Claude Passeron and Jaques Revel: ‘A case is what makes the questions’ <sup>13</sup> (Passeron and Revert, 2005, cited in Chetcuti-Ozorovitz, 2021: 222). From this perspective, I selected three individual cases that can be understood as a single case study given that they pose the same question at the same time: what is the relationship between discourse and the production of the subject ‘women terrorists?’ This leads me to the first transversal element of my research design: Critical Discourse Analysis (CDA).

According to one of the most renowned scholars on CDA, Norman Fairclough, this method is “a form of *critical* social analysis” (Fairclough, 2018), emphasis added. As such, CDA has become a tool to relate discourse with other social elements such as power, ideologies, institutions, etc. As my thesis aims to understand how discourse produces subjects, CDA is a very precise tool to unfold

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<sup>13</sup> My translation for more clarity: ‘*Un cas, c’est ce qui pose question*’ referencing the inductive thinking that case studies present.

the layers of the relationships between discourse and power. According to Fairclough, CDA places its focus on the power that lies behind discourse, not only the power of the discourse itself (Fairclough 1989, cited in Fairclough 2018).

According to Foucault, the procedures of power imbue the body with the mechanics of life within the basis of biological processes (Foucault, 1978: 139). Foucault claims that “the disciplines of the body and the regulations of the population constituted the two poles around which the organization of power over life was deployed” (Foucault, 1978: 139). In this sense, the power technologies affected bodies directly, producing them as subjects. The great technology of power in the 19<sup>th</sup> century, in Foucault’s view, was the deployment of sexuality as a development of capitalism (Foucault, 1978).

The power technologies that Foucault<sup>14</sup> references are embedded and reproduced in discourse. CDA, as its name implies, is different from non-critical discourse analysis. Non-critical discourse analysis as a theory fails to explain and provide solutions for social problems, and it does not aid in the exercise of critique and resistance (van Dijk, 1999).

CDA, however, helps in understanding the social contexts—established as social constructions—that represent the mental constructs (models) that individuals (users of language) build as relevant to the social situation (van Dijk, 1999). CDA is a normative and explanatory critique, according to Fairclough (2018: 14). This reflects that CDA critiques norms and values in causal and dialectical relations. In this dialectical sense, Fairclough has developed four steps that characterize CDA:

1. Normative critique of discourse.
2. Explanation of normatively criticized discourse in terms of features of the existing state of affairs (existing social reality).
3. Explanatory critique of the existing state of affairs.
4. Advocating action to change the existing state of affairs “for the better” (Fairclough, 2018).

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<sup>14</sup> According to Foucault and the lecture *The order of Discourse* he stresses that in ‘every society the production of discourse is at once controlled, selected, organized, and redistributed by a certain number of procedures whose role is to ward off its powers and dangers’ (Foucault, 1981).

With regard to power, according to van Dijk, the relationship between discourse and power implies that those who control the most influential discourses also have a greater ability to shape people's opinions and actions (van Dijk, 1999). These powerful individuals—members of a social group or an institution—have access to more kinds of public discourses, such as the judiciary discourse or mass media.

CDA relates these social structures with discourse structures (van Dijk, 2018). We might, as van Dijk suggests, begin by identifying the author(s) of the texts that make up a discourse, such as the editors of a newspaper within a powerful media organization, who have the capacity to influence how people view the social context in which they are immersed.

When observing discourse from this critical point of view, I observed that discourses use words to provide connotations to the content. For example, as Caron Gentry and Laura Sjoberg have established, “the word terrorism has normative connotations and is often used to delegitimize people that it labels” (Gentry & Sjoberg, 2015)

Understanding how discourse produces subjects becomes relevant in that it gives us a point of view that reaches beyond discussions of representation and agency in order to understand the constitution of the subject of the ‘female’ terrorist or ‘female’ militant (Gentry & Sjoberg, 2015: 326)<sup>15</sup>.

CDA helped me understand the discursive frameworks—provided by context reproduced by discourse—of women who participate in political violence, as well as how and why they are visible when they are visible or invisible when they are invisible; always filtered through comparisons between expectations of idealized feminine behavior and these women's actual behavior (Gentry & Sjoberg, 2015: 326). For example, here we have three women who share similar perspectives but are framed very differently. I will further develop this analysis below.

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<sup>15</sup> The term ‘female terrorist’ belongs to the cited authors.

Now that I have established the grounds for my methodology design, I must address my positionality in doing this research. From my standing point of view,<sup>16</sup> I must take into consideration that I work as a criminal lawyer in Argentina at the Prosecutors' Office. As such, I have observed how the sentencing process occurs in Buenos Aires, Argentina and under which circumstances, especially when it comes to convicting women. This is why I wondered, during the early stages of this research, how women are produced as subjects by the patriarchal logic that the judicial sentencing process reproduces. I decided to complement the judiciary discourse with two other perspectives because I maintain that social context, following van Dijk, is an important element in the analysis of power relations. In addition, I must say that I approach the *words* I have chosen to analyze without arguing in favor or against the political motivations that may lie behind the actions carried out by these women.

## 2. Critical Discourse Analysis from a gendered perspective. Why should CDA interact with feminist legal theory? Literature review

Following this definition of the scope and methodology of my research design, I should clarify that I have selected a differentiated approach to CDA. The reason is that, like many feminist scholars from diverse disciplines, such as anthropology, law, sociology, and history, among others (Harding, 1986; McKinnon, 1987; Barlett, 1990; Smart, 1989, 2000; Kohen, 2000; Scales, 2006; Chiarotti, 2006; Hamilton, 2007a; Hunter et al, 2010), I maintain, in agreement with van Dijk, that CDA owes a debt to feminist approaches in women's studies (van Dijk, 1990, cited in Lazar, 2007: 143).

According to Marjorie Pryse, "concerning methodology, Feminist Studies cross disciplinary borders in order to construct ways of thinking in feminist analytic terms" (Pryse, 2000). Therefore, although CDA acknowledges critical social studies, it is still embedded in the patriarchal logic of reasoning.

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<sup>16</sup> According to Donna Haraway, it is impossible to escape from our own biases in order to achieve "objectivity." In particular, she states that the use of an objective pronoun in an attempt to achieve methodological objectivity refers to a male use of that pronoun, rendering women invisible. Therefore, positioning oneself provides transparency on our own biases and sheds light on the role of a woman researcher (Haraway, 1988).

Michelle M. Lazar developed the terminology of Feminist Critical Discourse Analysis motivated “by goals of social emancipation and transformation” (Lazar, 2007). Referring to one study, the researcher states that:

This article brings CDA and feminist studies together in proposing a ‘feminist critical discourse analysis’ (...) which aims to advance a rich and nuanced understanding of the complex workings of power and ideology in discourse in sustaining (hierarchically) gender social arrangements (Lazar, 2007).

In this sense, power and power relations from a Foucauldian perspective, according to feminist scholar Monique Deveux, only partially explain how power is gendered. According to Deveux, Foucault’s writing on power has a “certain heuristic value for feminists,” but she stresses that uncritical appropriations of Foucault’s concepts “erase women’s specific experiences with power” (Deveux, 1994: 224).

This does not mean that CDA is not a useful tool to shed light on how power is embedded in discourse and how, through discourse, powerful groups or individuals can change the social context and, therefore, the cognitive perception of individuals within a society (van Dijk, 1999). Nonetheless, this critical perspective renders invisible the power relations regarding gender. As Lazar stresses regarding power, even though it may be “everywhere” (as theorized by Foucault), gendered subjects are affected by it in different ways (Lazar, 2007).

According to Gentry and Sjoberg, if we want to understand political interests in women as agents of violence, we will now find them in traditional work (Gentry & Sjoberg, 2015: 324). In the case of their research within the theoretical framework of critical terrorist studies, the researchers hold that power relations and their analysis do not take into account constrained choices, relational decision-making, and the social production of political subjects.

My goal is to to analyze how ‘women terrorists’ are produced as subjects. If I did not approach this analysis from a feminist perspective, I would only have made a partial analysis of the primary sources I have selected in order to understand this production of subjects as such.

To counter power dominance, according to Foucault, there is resistance. However, if that power is rendered invisible by gendered bias, there is no material possibility to counter it. Without a feminist lens, we cannot substantively change the existing conditions of power relations (Lazar, 2007). Gender is another system of oppression, more pervasive and complex than others (Eckert, 1989: 253-254 cited in Lazar, 2007: 143).

In this line of thought, from the perspective of epistemological feminism, gender is an ideological structure. According to Lazar, ideologies are “representations of practices formed from particular perspectives in the interest of maintaining unequal power relations and dominance” (Lazar, 2007: 147). Thus, as mentioned above, CDA becomes a tool that allows us to shed light on the power that lies behind the discourse which reproduces ideology. Therefore, approaching the production of subjects from an empirical study has value for feminist CDA.

### 3. Relevant primary sources. *The words*

In order to put feminist CDA into practice as a tool within the case studies, I selected the discourses to be analyzed. In this section, I will refer to how I selected primary sources and what they are.

#### 3. I. Judges' rulings. *The judiciary*

The narrative of the judiciary power is built through several elements through which judges deploy their power. These can be any act of a legal process—related to civil, criminal, or tax law, among others—such as determining the amount of punitive damages one party must pay the other, or if a person should be imprisoned during a criminal process because the judge believes there is a risk regarding completion of the inquiry if the indicted individual is free.

These examples lead me to observe what judiciary power is. From the point of view of critical analysis (Foucault, [1978] 2001), the way in which we judge our society for the “errors” of individuals can be understood regarding how we relate to the pursuit of the truth (Foucault, [1978] 2001).

After these brief comments, I must refer to the judges' rulings that I will analyze as primary sources in this thesis. As I mentioned above (II.1), I will analyze three cases of Basque women who were involved in judicial processes regarding terrorism. The rulings are from two different legal instances: the *Audiencia*



*Nacional*, which has jurisdiction over the entire Spanish territory regarding specific matters such as terrorism, organized crime such as drug trafficking, and crimes related to the Crown or to members of government;<sup>17</sup> and the *Tribunal Supremo*, which has jurisdiction as a chamber of appeals over the *Audiencia Nacional*. The latter Tribunal unifies the legal criterion of application of law in the Spanish territory.

I will analyze a total of ten rulings: seven in the case of Marixol Iparagirre through the *Audiencia Nacional*,<sup>18</sup> one in that of Iratxe Sorzabal through the *Audiencia Nacional*,<sup>19</sup> and two in the case of of Ainara Urkijo: one through the *Audiencia Nacional*, and one through the *Tribunal Supremo*.

In the case of Iratxe Sorzabal, the ruling was appealed, but for the purpose of this thesis, this is not an obstacle to analyzing the words the judiciary power utilized in her case.

### 3. II. Press articles. The media

The context of media and how the media communicates is beyond the scope of this thesis. Nonetheless, some considerations about the press must be made in order to understand my selection of primary sources.

Spanish daily newspapers have a low circulation rate in comparison to those of other EU countries (Artero & Sanchez-Tabernero, 2016). According to these authors, who analyzed media ownership and concentration in Spain, there are three flagship newspapers in Spain: *El País*, *El Mundo*, and *ABC*. All three of these daily newspapers are published in Madrid. Two of them make up half of my primary source bank. *El País* is the main media outlet of PRISA Group, and it is considered left-leaning with regards to political orientation. *ABC* is a conservative newspaper, and, according to Artero and Sanchez-Tabernero, it supports the policies of the right-wing party, the *Partido Popular*.

In addition to these media outlets, I selected two regional newspapers: *El Diario Vasco* and *Gara-Naiz*. The first belongs to the group Vocento, which also owns

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<sup>17</sup> The faculties of the *Audiencia Nacional* are regulated by the *Ley Orgánica del Poder Judicial 6/1985*.

<sup>18</sup> The cases are identified as: *Sumario 38-1985*; *Sumario 43-1988*; *Sumario 50-1985*; *Sumario 82-1997*; *Sumario 54-1995*; *Sumario 6-1998*; and *Sumario 62-1994*. *Sumario 50-1985* and *Sumario 6-1998* are acquittals.

<sup>19</sup> *Sumario 8-2015*.

the newspaper *ABC* at a national level. The editorial line in the case of *El Diario Vasco* is generally conservative, but not as conservative as that of *ABC*. The newspaper *Gara-Naiz* stands very close to the *abertzale*<sup>20</sup> left of the Basque Country, in almost direct opposition to *El Diario Vasco*.

### 3. III. Public statements. The victims of terrorism associations

Regarding public statements, I identified two large organizations. The first is called *Colectivo de Víctimas de Terrorismo* (COVITE), the Basque Victims of Terrorism Association. According to its website, it is a national organization representing the families of over 400 victims murdered by ETA or GAL.<sup>21</sup>

COVITE's participation in the social arena has been very broad. In particular, it denounces all activities that enhance terrorism, according to Spanish criminal law (article 578 of the Spanish Criminal Code), and it does so in public speeches or statements in the press media, but also by presenting complaints in the judiciary system as well as through *acusación popular*<sup>22</sup>.

The other main organization is *Asociación Víctimas del Terrorismo* (AVT), the Victims of Terrorism Association, which brings together more than 4,800 associates, including people who were injured, survivors, widows, and close family members, among others.

As in the case of COVITE, AVT also participates as a party in criminal processes regarding terrorism. In addition, it carries out campaigns against terrorism and publishes a variety of materials containing penitentiary information on inmates convicted of terrorism.

Both of these actors produce strong narratives in opposition to the claims of prisoners' organizations like *Etxerat* or EPPK. Both COVITE and ATV are very

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<sup>20</sup> Abertzale is a Basque word that translates as patriot. It is commonly used to describe a person that belongs to the nationalist movement in the Basque Country.

<sup>21</sup> GAL stands for *Grupos Antiterroristas de Liberación*, or Antiterrorist Groups for Liberation in English. It was a paramilitary group that fought ETA and militants. It was created by the Ministry of the Interior and exercised power between 1983 and 1987, though its actions were considered state terrorism (De Pablo, 2015: 399).

<sup>22</sup> The *acusación popular* is a legal figure that allows parties that can demonstrate a legit interest in the case to be part of the criminal procedure.

active in mass media and therefore provide their own statements on their websites, though they are also frequently consulted by journalists.

In particular for this part of my analysis, there are only statements for the case of Maria Soledad Iparagirre. Since those statements were obtained from the organizations' websites, my search was limited to what they wished to publicly and officially express.

### I. The cases. Interactions between the *words* and the facts

I chose three cases of Basque women convicted for crimes related to terrorism. The first, that of María Soledad Iparagirre, involves a woman who was part of ETA leadership during the 1990s and 2000s. She received several convictions in Spain and in France for acts related to terrorism. She was detained in France in 2004 and is currently in prison. The second case is that of Iratxe Sorzabal, also a very relevant woman within ETA. The difference is that, during her trial, she claimed that the evidence that led to her conviction was illegally obtained through torture. The third case that of a young woman called Ainara Urkijo, part of the *Altsasu* case,<sup>23</sup> who was prosecuted for crimes related to terrorism that were later reframed as different crimes. She was convicted along with seven young men, and she was the only one who did not receive a high conviction. In this case, the judicial resolution leads me to suspect that she received a more lenient punishment due to the fact that the events were categorized as a 'bar fight' and that her participation in such events is not 'allowed' by gender-role stereotypes.

In the following sections, I will expand the feminist CDA regarding each case and the primary sources obtained.

#### 1. Can a woman be convicted as the head of a terrorist organization? The case of Maria Soledad Iparagirre

Maria Soledad Iparagirre, known as Marixol or by her alias Anboto, was convicted for several crimes related to terrorism. Some convictions specified her as the perpetrator of a crime. But, for the other convictions—most of those she had to face in Spanish territory—she was found guilty as co-perpetrator along with other

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<sup>23</sup> The Altsasu incident is a judicial case against eight young people from Altsasu, a small town in Navarre, Spain, for their involvement in a fight taking place on 15 October 2016 at a bar in which two off-duty Civil Guard officers stationed in the town and their girlfriends sustained injuries.

participants. Those were all men, in a subordinated relationship to her as ETA members.

According to the rulings,<sup>24</sup> Maria Soledad Iparagirre was born in a small town in the Basque Country called Eskoriatza. She joined ETA in the late 1980s and, after the head of ETA at the time was captured in 1994, she, along with others, assumed the role.

In the early 1980s, she was captured by the Basque police and registered in the police system, then released without charges. Afterwards, Maria Soledad left the Basque Country for France. From there, she returned to join the military branch of ETA and belonged to the *Comando Araba*.<sup>25</sup> In 1994, she took on leadership of the military branch of the organization while in hiding in France.

In 2004, Maria Soledad was captured in France with her partner, also a leader within the organization, and was sentenced to twenty years in prison by the French justice system for multiple crimes, including being part of a terrorist organization in a leadership capacity.<sup>26</sup> As such, in the opinion of the Spanish justice system, it was a proven fact that Maria Soledad was the head of ETA between 1994 and 1995. She was in charge of the organization's finances and coordination and logistics of the 'legal' *comandos*. 'Legal' was the label applied to those who were not clandestine, and since Maria Soledad was not 'burned',<sup>27</sup> she was fit to lead the 'legal' groups.

In 2019, French criminal justice extradited Maria Soledad to Spain so she could face relevant criminal processes under Spanish jurisdiction. In this section, I will briefly refer to those trials and their details. At the time this thesis was written, Maria Soledad had faced seven trials, but she was extradited to face a total of twelve, which, at the time of writing, are still ongoing. The *sumarios* (rulings) are briefly developed in the appendix to chapter VI; by way of summary, between January and November 2021, Maria Soledad was convicted in five of the seven

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<sup>24</sup> At this particular point of the analysis I will take the factual platform by the one given and accepted by the judges' rulings as 'proven facts'.

<sup>25</sup> The *Comando Araba* (Araba is the name in Euskera for one of the regions of the Basque Country) was operational between the 1970s and late 1990s.

<sup>26</sup> This conviction was ruled on in November 2010.

<sup>27</sup> 'Burned' was the term applied to militants who were known for their illegal actions and needed to remain hidden from the police.

cases she faced for charges of attempted murder, provocation of devastating material damages, and personal injuries. All of these cases were in the context of crimes of terrorism and for events that took place during the 1980s and 1990s and were put on hold until she had served time in France.

When observing the collected Spanish rulings,<sup>28</sup> I would first like to highlight the context that comes to light. The judges' rulings are being made between twenty and thirty-five years after the crimes were committed. The time that has passed must be considered when observing the social context in which the judges live. ETA's ceasefire took effect in 2018, and Maria Soledad was one of the three people in charge of presenting the official communication to the world. As such, the ruling judges are analyzing facts and evidence that were built and obtained in a very different context.<sup>29</sup>

We can now more closely observe what van Dijk (1999: 186) refers to as intertextuality, that is, the relationship between the context and the *discourse*, what in Fairclough's terms is termed interdiscursivity (2012: 12). The content of the rulings has a common theme: a woman who does not 'defend' herself from the prosecution's harassment, but rather uses that opportunity at the public hearing to shed light on the torture suffered by her fellow ETA members, whose declarations were collected under torture.

For example, in *Sumario 43-1988*, in which she was convicted for attempted murder and provocation of devastating material damages, her strategy was not to defend herself:

The Defense, who did not intervene in the production of evidence or the processing of the reports, requested acquittal. The accused, in her closing statement, denied the facts and claimed that she should not be convicted for a testimony obtained under torture (*Sumario 43-1988*).

I observed the same in *Sumario 54-1995*, in which she added that she had already served time for her crimes:

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<sup>28</sup> The rulings: *Sumario 54-1995*, *Sumario 92-1997*, *Sumario 43-1988*, *Sumario 37-1985*, *Sumario 62-1994*, *Sumario 50-1985*, and *Sumario 6-1998*.

<sup>29</sup> For example, one of the cases references the lack of enforcement by the Prosecutor's Office in commanding the Civil Guard to produce evidence.

During the hearing, Maria Soledad Iparagirre refused to testify, and in the exercise of her right to a closing statement, she claimed to have already served time for all her crimes, lamenting what she understood to be a lack of investigation into the torture to which her colleagues in the ETA organization have been subjected.<sup>30</sup> (*Sumario 54-1995*)

This strategy was also found repeatedly in *Sumario 37-1995*:

The accused and her defense did not question the evidence produced during the trial nor make any claim regarding the charges or accusations made by the Prosecution, the accused having stated at the beginning of the trial that she would not answer any questions and that she would not present any defense. (*Sumario 37-1985*)

Maria Soledad did not intend to controvert any evidence or participate in the production of it. However, using the opportunity of her closing statement, she referred to the legitimacy of the process and consequent conviction by stating that the evidence was obtained through torture.<sup>31</sup>

In this context, the judges had to observe the evidence without any contestation from the defense. According to the rulings, Maria Soledad was in a leadership role in most the situations, in particular those in which she provided elements and targets to the *comandos*. In the opinion of the judges, she was a ‘chief.’

Another key element of the rulings is that the production of Maria Soledad as a ‘woman terrorist’ must be connected to her *alter ego* and alias: Anboto. To clarify this reference, Anboto is a mountain in the Basque Country that is well-known among the locals for its difficulty to be climbed due to its limestone composition. In addition to the soil of the mountain, it is hard to climb due to its inclination. Anboto —the woman— was the chief of ETA, but Maria Soledad was not. Every time she faced a process as a defendant, she denied that the alias ‘Anboto’ referred to her. Therefore, in her strategy, it had a relevant impact when the judges of the *Tribunal Supremo* considered that they had enough evidence to revert this statement. After the judges linked ‘Anboto’ to Maria Soledad Iparagirre,

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<sup>30</sup> My translation.

<sup>31</sup> This is quite a common approach to political trials. In this sense, see Allo (2017) and Melze (2015).

she changed her defense strategy in the sense that she did not longer contested the accusations that identified her as the chief of the organization. When the judges began referring to María Soledad as 'Anboto' the 'woman terrorist' finally had a name, and it was a force of nature.

For example, until that moment, when Maria Soledad was exonerated for the events that took place in Oviedo in 1998, the judges of the *Audiencia Nacional* expressed that, when convicting Maria Soledad. The French judge "Did not use the name Anboto. It is a myth. She is assigned to a participation in the organization that she did not have" (*Sumario* 6-1998).

Another element the judges took into account to convict Maria Soledad as chief of the military branch of ETA was witness identification, which was related to her alias. These witnesses were co-indicted with her in the *sumarios* mentioned above; they were convicted before she was and acted as witnesses in her trials.<sup>32</sup> They mentioned a relationship between photographs that the police had shown them that was allegedly of Maria Soledad and the person that they knew as 'Anboto'. that the police had shown them and they pointed her as Anboto. Judges had to convict Maria Soledad based on hearsay as production of evidence, mainly through the words of subordinate men within the organization.

The link between Maria Soledad and 'Anboto' raises another element of interdiscursivity: the words of the media. The testimonies of the militants tried alongside Maria Soledad often mentioned that, while at the police station, officers showed them a picture of a woman and asked them to identify her. In most statements, they confirmed that the woman was 'Anboto.' In some instances, they gave different names like Marixol or Soledad, but 'Anboto' was the key name they related to the picture. Whether or not they had met her in person, they claimed that they recognized her from the news.

An element of subjectivity present in all the newspapers articles analyzed for this thesis was that Maria Soledad Iparagirre was 'Anboto.'

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<sup>32</sup> In most of them, the testimonies were heard on two occasions: first, when the accused were captured and detained by the police, and second at the hearings in the context of Maria Soledad's trials. According to her defense strategy, since the first testimony was obtained through torture, it should not be taken into account for her conviction as chief.

For example, some articles in *El País* use 'Anboto' and Maria Soledad Iparagirre in the same article: 'Trial to the etarra<sup>33</sup> 'Anboto' for the crime of a postman in 1985' (March 9<sup>th</sup>, 2021)<sup>34</sup>; 'The *Tribunal Supremo* ratifies that Anboto is Anboto' (February 10<sup>th</sup>, 2021)<sup>35</sup>; and 'Soledad Iparagirre: the *etarra* acquitted in the second trial held against her in Spain' (January 29<sup>th</sup>, 2021)<sup>36</sup>.

The newspaper *El diario vasco*, a local newspaper in the Basque Country, the headlines only state that 'Anboto' is the alias of the *etarra* terrorist that co-led ETA: 'France convicts the ex-chiefs of ETA 'Mikel Lantza' and 'Anboto' to 20 years' (December 17<sup>th</sup>, 2010)<sup>37</sup>. This article shows a picture of a young María Soledad Iparagirre next to Mikel Abisu, her partner and co-head of ETA. Here, for example, the newspaper was stating that 'Anboto' was Maria Soledad, even providing a photograph of her. The article was published eleven years before the *Tribunal Supremo* ruled that 'Anboto' and Maria Soledad were the same 'woman terrorist' who led ETA.

In addition to her identity, the production of the 'woman terrorist' is embedded in gender stereotypes of social roles and behaviors. The newspaper *ABC*, the most conservative of those selected for this thesis—according to Artero & Sanchez-Tabernero (2016)—refers to a new aspect of Maria Soledad that was not present in the judges' *discourse*: her femininity.

*ABC* claimed that ETA kept women from carrying out the organization's violent acts, with three exceptions: Yoyes, Anboto, and Iratxe Sorzabal. The article includes the following quote: "In the Basque Country, at that time, women were in charge of their houses, but outside their role was not very important" (March 9<sup>th</sup>, 2021)<sup>38</sup>.

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<sup>33</sup> *Etarra* is the term to identify those who belong to ETA. The suffix 'arra' in Basque means 'from' and it is commonly used as a gentility.

<sup>34</sup> My translation from the original: 'Juicio a la etarra 'Anboto' por el crimen de un cartero en 1985'.

<sup>35</sup> My translation from the original: 'El Tribunal Supremo ratifica que Anboto es Anboto'.

<sup>36</sup> My translation from the original: 'Soledad Iparagirre: La etarra Anboto, absuelta en el segundo juicio celebrado contra ella en España'.

<sup>37</sup> My translation from the original: 'Francia condena a 20 años a los ex dirigente de ETA 'Mikel Lantza' y 'Anboto'.

<sup>38</sup> My translation from the original: 'ETA reservó a las mujeres, salvo tres excepciones, un rol secundario'.



Although the role of women within a terrorist organization is not among the research questions of this thesis, it is impossible to overlook the fact that the perception of the gendered division of work also applied in these kinds of organizations. However, what is relevant for my research questions is that Maria Soledad Iparagirre was an exception herself: because she was a woman, she should not have been relevant. Therefore, if she was the head of an organization such as ETA, there must be something different about her. Characterizing her as a woman was 'wrong,' according to how women are produced in a patriarchal society. Maria Soledad, in the eyes of the media, was a deviation from a pre-established role. She was a woman who "makes the blood run cold" (according to *ABC* newspaper in an article published June 11<sup>th</sup>, 2021, my translation); but even though she was considered "nothing but a terrorist" or "the boss in charge of ETA finances", that is, even though she had achieved this level within the hierarchy, for the journalist who wrote this article, it was necessary to clarify that her partner was Mikel Albisu: the head of ETA's military deployment.

It is also relevant for the production of subjects to understand the context in which narratives are expressed. The most conservative newspaper refers to the status quo in this sexual division of labor within ETA, which mirrors the classic gendered division between the private and the public spheres (Chiarotti, 2006).

In Maria Soledad's case, she is the only object of a statement made by NGOs for the victims of terrorisms. Both COVITE and AVT stressed that her transfer to the Basque Country was very dangerous as a precedent for democracy and for the support that exists for terrorism, in their opinion. COVITE complained that Sortu, the party most closely related to the *abertzale* left in the Basque country, tried to legitimize Maria Soledad's actions, which the organization considered unacceptable because "she has more than a few murders under her belt" and that this would represent an "authentic humiliation for the rule of law." (COVITE denounces that warships from Sortu to 'Anboto' are a humiliation to the Rule of Law)<sup>39</sup>, In this same sense, AVT complained that 'Anboto', as they refer to her, was transferred to a prison facility in the Basque Country. Indeed, the AVT directly

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<sup>39</sup> My translation from Spanish: COVITE denuncia que las alabanzas de Sortu a 'Anboto' son una humillación para el Estado de Derecho.

called Maria Soledad the “bloodthirsty chief of ETA.” (AVT, *Interior does not give in in their carceral policy and mooves the chief of ETA ‘Anboto’ into Basque Country*, June 4<sup>th</sup>. 2021)<sup>40</sup>

Maria Soledad Iparagirre was produced as a deviant woman, in the sense argued by Mary Corcoran (2006) and Natacha Chetcuti-Osorovitz (2021). Not only was she a terrifying terrorist; she was a woman in charge.

## 2. Constructing subjectivity from state abuse: The case of Iratxe Sorzabal

Iratxe Sorzabal, like Maria Soledad Iparagirre, was convicted of several crimes related to terrorism. The key difference that I observe is that most of Iratxe’s convictions occurred in France, in four cases. According to the ruling *Sumario 8-2015* issued by the *Audiencia Nacional* on February 18<sup>th</sup>, 2022, Iratxe was convicted in France on four occasions for her participation in unlawful association in 2006, 2007, and twice in 2012. All of these convictions were for crimes committed between the years 2003 and 2007.

In the Spanish ruling,<sup>41</sup> Iratxe was found guilty of placing two bombs in Gijón, Asturias in two different buildings in 1996. However, the most relevant evidence used to convict her was a letter that she wrote, called a *cantada*, that mentioned all her relevant past actions and participation in order to inform ETA what she had said to the police when detained.

In her statement at the public trial, Iratxe stressed that she was recruited to be part of ETA as a collaborator. After she was convicted in France and imprisoned in 1996, she was released after serving two thirds of her total sentence. She returned to Irún, where her family lived, and she stated in the public trial that she worked on cases of imprisoned militants as part of *Pro-Amnistía* (claims the ruling).

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<sup>40</sup> My translation from Spanish: Interior no cede en su política penitenciaria y traslada a la jefa de ETA ‘Anboto’ al País Vasco

<sup>41</sup> *Sumario 8-2015*, February 18<sup>th</sup>, 2022.

After a few years in Spain, she was detained by the Civil Guard in 2001 and was placed under solitary confinement for five days. Iratxe stated that during those five days she suffered ill treatment and sexual abuse. Under these conditions, she was forced to testify against herself. The judges' ruling includes the following from her statement at public trial:

She points out that she was tortured and forced to make the statements that exist in the case. She adds that she could not refuse to do so, that she was forced to memorize things, to rehearse what was that she had to say in the statements, and then to make the statement, which had to be in accordance with what was rehearsed.<sup>42</sup>

Following the torture she underwent, she left Spain for France. At that point, she joined ETA to later become one of the organization's chiefs.

By analyzing the relation between the facts of Iratxe's 1) arrest, 2) solitary confinement,<sup>43</sup> 3) forced statement and reported ill treatment, and 4) conviction, I can trace how the production of the subject of 'woman terrorist' is embedded in a very strong power relation. But in this case, contrary to that of Maria Soledad Iparagirre, Iratxe Sorzabal bodily suffered the consequences of the power exercised by the police, and later by the criminal justice system. From this perspective, I will analyze what the judges considered to be a victim: they established that a 'woman terrorist' has too high a tolerance for violations to her integrity to be consider a victim herself.

There are several elements to be pointed in from the judges' ruling. First, the judges made use of a written instrument, the *cantada*, to determine proof of fact. Iratxe Sorzabal was convicted because the judges understood that the *words* contained in the letter and expressing her participation in acts of terrorism were sufficient legal evidence to convict her.

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<sup>42</sup> My translation from the original in Spanish: "Señala que la torturaron y le obligaron a hacer las declaraciones que constan, añade que no se podía negar a ello, le obligaban a aprender cosas de memoria, a ensayar lo que tenía que decir en las declaraciones y luego a declarar y que coincidieran los ensayos con las declaraciones."

<sup>43</sup> According to Spanish Criminal law (*Ley de enjuiciamiento penal*), solitary confinement must be limited in time and determined by a judge (article 520 and following from LECrim).

According to the ruling, the militant Iratxe expressed in her letter her own conviction about *who* she was, the role she occupied, and how she participated. Therefore, by considering that that letter was produced in a free, spontaneous, and willing condition, the judges also considered that Iratxe was always free, spontaneous, and willing.

Iratxe's defense, which was supported by medical reports, stated that the *cantada* was produced under coercion. As such, medical reports produced in France had to be obtained.<sup>44</sup> Although French authorities were very strongly opposed to transferring Iratxe to Spanish territory,<sup>45</sup> the Spanish judges held that the *cantada* was valid. Through this act, the judges produced a subject who was not a 'victim.' She was a woman with enough agency to remain in solitary confinement for five days, leave the police station, and then write a letter to the organization letting them know what she had said to the Civil Guard.

The ruling contains two discourses that are intertwined and, at the same time, contradictory, as positions generally are in a trial. The accusatory process is in itself contradictory, but in this case the written elements that each party used to prove the factual platform are both discourses related to Iratxe as an individual. In the defense's strategy, Iratxe was a victim who completely lost her capability to act freely and was forced to self-incriminate. Given that this logic is contrary and that Iratxe was deviant woman terrorist who was head of ETA, the judges maintained that, even if torture had occurred, it could not have had a strong enough influence on her as to induce her to write the letter:

And we say that the document was written voluntarily because it was not written the day after or several days after she was arrested, while in prison (...) but rather some time after she was released, (...) and more importantly,

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<sup>44</sup> I must highlight that during the process in which Spain filed a request with the French authorities that Iratxe Sorzabal be transferred for trial in Spanish territory, the French Attorney General objected, stating that there was sufficient evidence to consider Iratxe Sorzabal a victim of torture. This position was based on a report by Dr. Pierre Duterte, in which he stated that Iratxe had signs of torture in accordance with the Istanbul Protocol, originally produced in 1999, which is a series of principles that set out the minimum standards for States to investigate and document torture and ill treatment as defined by the United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, 1984.

<sup>45</sup> French justice rejected the euroorder because the Attorney General held that Spain did not guarantee compliance with article 5 of the European Charter of Human Rights.

we believe that the psychological state resulting from the torture could not have had much influence in the writing of the handwritten note.<sup>46</sup>

The case of Iratxe Sorzabal reflects how reporting torture is not enough to overrule the subject of ‘woman terrorist’ that the criminal justice system builds around a woman undergoing a criminal process for acts of terrorism.

In addition to the judiciary *discourse*, newspapers referred to her differently than they did in the case of Maria Soledad. The media did echo the fact that Iratxe had reported being the victim of torture, but not all outlets and not to the same extent. The newspaper *ABC* referred to Iratxe as an “ETA member” who did not admit her participation in the events under investigation, without making any reference to self-incrimination or torture (February 22<sup>nd</sup>, 2022). A few days earlier, on February 8<sup>th</sup>, 2022, the same newspaper stated that “(Iratxe Sorzabal) Insists to the *Audiencia Nacional* that she only confessed ‘under torture,’ which has already been disproven<sup>47</sup> by Justice.”

Regarding the torture, the newspaper *El Diario Vasco* made reference to her detention in Civil Guard facilities. The article claimed that during the interrogations she “confessed” to being part of *comando Ibarla*. It is interesting to underscore that there exists in the concept of ‘confession’ an element of pre-existing freedom in order to provide a legitimate confession. However, the article did not make any references to coercion (October 11<sup>th</sup>, 2011).

### 3. Being left aside. Being a terrorist and not being a terrorist: The case of Altsasu and Ainara Urkijo

Ainara Urkijo, a young woman from Altsasu, Navarra, was involved in a bar quarrel in 2016, during the town’s festivities that take place every year in October. In many towns in the Basque Country, there are Civil Guard security posts, and their presence within the community is openly rejected.<sup>48</sup>

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<sup>46</sup> My translation of the original Spanish: “Y decimos que el documento ha sido elaborado de forma voluntaria porque el mismo no se hizo al día siguiente o varios días después de ser detenida, estando en prisión (...) sino bastante tiempo después de ser puesta en libertad, (...) y lo que es más importante, creemos que en la elaboración de la nota manuscrita no pudo tener tanta influencia ya el estado psicológico derivado de las torturas.”

<sup>47</sup> The original in Spanish uses the word ‘*desmentir*’ which is to break a lie into a truth.

<sup>48</sup> There is a political statement in Euskera that makes reference to the Civil Guard’s presence: “*Alde Hemendik*,” which translates as: “Get out of here!”

On the night of October 15<sup>th</sup>, two civil guards went with their romantic partners to have a drink in a local bar. Locals soon began to insult the guards, who finally left the bar. Some twenty people from the town were gathered around the door and a few of them hit the guards.

The fight ended when local police arrived and detained a young man who was central to the aggression. One of the civil guards was injured (his ankle was broken), and all four non-locals expressed that they were very frightened and had indeed feared for their lives.<sup>49</sup>

The particularities of the case regarding the criminal proceedings are that, first, the case was filed under the legal qualification of injuries, threats, public disorder and assault on authority, all of them related to ‘terrorism.’ Therefore, the jurisdiction was not a provincial one; it fell to the *Audiencia Nacional* to judge the events.

Within the context of ‘terrorism,’ the defendants received more burdensome treatment. For instance, according to the dispersion policy applied by the Spanish penitentiary system, all inmates convicted of crimes related to terrorism were sent to different facilities far from the Basque Country (De la Cuesta, 1987: 592-597).

According to the ruling, eight people were convicted: seven men and one woman, Ainara. In *Sentencia n° 17/2018*, the judges of the *Audiencia Nacional* established criminal liability for injuries, threats, assault on authority, and public disorder for the seven men, but in the case of Ainara—the only one who was never incarcerated—the judges only found her guilty of threats.

The *Audiencia Nacional* finally dismissed the charges for terrorism, maintaining a lack of the special capacity to “inflict terror and fear on the population.” Indeed, the judges consulted the definition of ‘terrorism’ provided by the Spanish dictionary of the *Real Academia Española*: “succession of acts of violence carried out to instill terror.”

The ruling’s use of ‘terrorism’ is related to the fact that the Prosecutor built his case on the hypothesis that the group was part of a left-wing political militant

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<sup>49</sup> These statements were made during the hearings at the *Audiencia Nacional*, in the case *Sentencia n° 17/2018*.

group that intended to harass the Civil Guard in order to make their lives in the town unbearable:

The injuries caused create terror that is transmitted to the rest of the population and to other towns in Navarra, a transmission of the fear and this terror that was already in the ideology of ALDE HEMENDIK, etc... And he goes on to say that there is no obstacle to considering that we are facing acts of a terrorist nature even though since 2012 the 'armed front' of ETA has stopped committing terrorist acts, has stopped killing as is often said, since what has been previously called 'mass front' subsists, whose purpose, among others, is to expel the Civil Guard from Navarre.

Within the context surrounding the event, the judges narrated the events as they understood them from evidence produced at the hearings. Regardless of the men's violent conduct, when referring to Ainara's actions, the judges only mentioned that "with a raised finger in an intimidating tone she said, 'this is what happened to you for going down to the village, every time you go out, the same thing will happen to you.'" (*Sentencia 17/2018*).

Although a few of the men defendants claimed that they did not hit or injure the guards, the judges did not charge them with threats. In fact, they stated the following:

And, finally, with regards to the crime of threats under Article 171.1 of the Criminal Code, the Penal Code provides for a penalty of three months to one year of imprisonment or a fine of six to twenty-four months, which should be imposed on the defendant Brigida, the only defendant charged with this crime.<sup>50</sup>

In the judges' opinion, Ainara was the only one who could threaten: not hit, not injure, only threaten. In addition, her actions were in relation to another woman: the guard's partner. Even though the guard expressed in his statement that Ainara threatened him as well as his girlfriend, the judges ruled that the only

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<sup>50</sup> Since this ruling was obtain from the Public data base, in order to prevail privacy of the defendants, they change the names. Brigida in this case is Ainara Urkijo. The ruling was very well circulated and discussed around the media and law scholars.

possible and attainable conduct was the one committed by a woman towards another woman.

Media coverage of the event was embedded in terrorists' acts. Therefore, all the persons involved were called *filoetarras*, or ETA sympathizers related to the continuity of ETA through its political representations of the 'true' meaning of political activism, such as *Alde Hemendik* (ABC, March 25<sup>th</sup>, 2019).

Most of the articles that described the event related the activities to a "beating" (normally the word used was *paliza*). However, regarding the violent element involved in a beating, Ainara was always left outside the media narrative that considered the event in that light. For example, the newspaper *El Diario Vasco* published the following: "Except for Ainara Urquijo, who was sentenced to two years in prison for the crime of threats and public disorder, the rest of the defendants were sentenced for the crimes of assault and battery" (June 1<sup>st</sup>, 2018). This concept of differentiation between the seven men defendants and Ainara is repeated in several articles in all the newspapers analyzed here. *Gara-Naiz* refers to her as "the only one who is currently free" (January 24<sup>th</sup>, 2019); "the only one who was not incarcerated" (ABC, December 18<sup>th</sup>, 2019); and "Ainara Urquijo, the only young woman" (ABC, April 18<sup>th</sup>, 2018).

There is an interesting distinction between the case of Ainara Urkijo and those of Maria Soledad Iparagirre and Iratxe Sorzabal, analyzed above. Even though the Altsasu case was embedded in a context of terrorism, the judges of the *Audiencia Nacional* and the *Tribunal Supremo* did not consider that the event was terrorism. Nonetheless, media coverage employed the logic of building terror and referring to old ETA strategies. When the media refer to Ainara, however, she has no point of comparison as a 'woman terrorist' like Maria Soledad or Iratxe.

Ainara was left aside from the fight. She did not participate in the event by exercising violence. She was part of it only to the extent in which a woman can be part of a bar fight: by making threats. She was not an exception or a deviation. She was not a monster or a bad woman. She was just a *girl* in a bar fight. That is what the patriarchal narratives produced. In order to produce a 'woman terrorist,' the standards of deviation must be well justified by the use of violence or the power to control others (normally men).



#### IV. Findings of the analysis

The production of ‘women terrorists’ as subjects is a process introjected by the patriarchal idea that there is a division of social roles according to gender.<sup>51</sup> Regarding the particularities of the Basque context, terrorism exists in the context of political violence that is ‘normally’ exercised by men; but, on the other hand, terrorism also exists in the context of political violence that is usually an exception: crimes committed by women terrorists.

As I observed in my analysis of the judges’ rulings in these three cases, women are produced as subjects while being compare to the role that they ‘should’ be fulfilling as expected. In the case of Maria Soledad, according to the judges, she was so deviant and such an exception that there was no possibility for her to avoid the association with her alias Anboto. Until that association was established, she was produced by the *discourses* of others, especially other members of ETA who were her subordinates, and also men.

The production of Maria Soledad as woman terrorist was carried out given the fact that she held the highest role in the organization’s hierarchy. According to the gendered division of labor under patriarchal stereotypes, command roles are not usually occupied by women, especially command roles that imply the use of violence.

Under gender essentialism in which women cannot be violent as men, there is a moment when discourses produce a dichotomy between the existing material conditions for women to be violent (as heteronormative women) and the fact that those conditions are only present because they are aberrant, deviating from gender normative production of womanhood.

According to Gentry and Sjoberg, there are three narratives that have been built around women who commit terrorist acts: the mother, the monster, and the whore (Sjoberg and Gentry 2007 cited in Gentry and Sjoberg, 2015: 322). According to the authors, the *mother* narrative was associated with the idea that women could

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<sup>51</sup> I do mention ‘sex’ instead of gender because for the hetero-cis patriarchal stereotypes, the assignments of roles is related to the biological sex in opposition to the self-define perception of gender (Chiarotti, 2006).

commit such actions in a “vengeful rage” due to some harm their family may have suffered.

The narrative of the *whore* “blames women’s violence on their sexuality” (Gentry & Sjoberg, 2015: 323). Not only do women not have enough agency to exercise violence; even in these cases, they cannot even have sexual desire. Motivation to exercise violence relies on the fact that women should be heterosexual, chaste, and submissive. In cases when women cannot control their sexuality, it is only logical that they cannot other urges, such as acting violently.

The final narrative explained by Gentry and Sjoberg is the *monster*, which relies on the concept of women as subjects who are *psychologically disturbed*. According to the authors, “[W]omen described by the monster narratives are described as crazy, irrational, and unpredictable – the worst manifestations of emotional femininity” (Gentry & Sjoberg, 2015: 322).

I have observed that the case of Maria Soledad Iparagirre is constructed in this sense. She was not precisely a *mother* who needed to take revenge for her family. She was not a traditionally submissive woman subject to her partner, the ‘evil terrorist.’ She was a woman with agency of her own. Therefore, she must be an exception, a deviation from the ‘natural’ role of women.

From this viewpoint, the two other cases I have analyzed also fit within the range of the narratives proposed by Gentry and Sjoberg. The case against Iratxe Sorzabal was built on the existing material conditions that she had to establish whether or not she is a victim. She was acting outside of the pre-established roles and occupying a role with significant responsibility, as head of a terrorist organization; even though the judges accepted that she may have been subjected to torture, that could overturn her monstrosity.

The final case, that of Ainara Urkijo as a part of the *Altsasu incident*, reflects precisely what it means for the *discourse* to maintain the roles that women are expected to fulfil. Since she was the only young woman involved in the event, and the event was not an extreme act of terrorism, her production as a ‘woman terrorist’ failed. However, this is because that production is no longer functional to the narrative of terrorism itself. Women do not exercise ‘regular’ violence.

Women do not exercise ‘political’ violence, *unless* they are either mothers defending their family or women without the capacity to restrain their desires, or simply monsters.

Regarding the judges’ rulings, I have observed that they describe the events in a very formalistic style. The judges explain the facts proven by the evidence produced in the hearings. Nonetheless, the judges used the words expressed in the narratives of defendants, victims, or witnesses without placing them in context. That context is completely absorbed by the ‘terrorism’ that motivates the trials. That historical context is where the judicial *discourse* reproduces the stereotypes provided by that context.

Although there are no adjectives in the body of the rulings that could be directly related to the role exercised by these women, the resource of interdiscursivity allows me to observe how the judges, using the voices of others, produced these ‘women terrorists’ as subjects. Maria Soledad was represented as a ‘silent’ woman because when she spoke in the context of the hearing, she took advantage of the public trial to express her rejection of the judicial process and its legitimacy. She was facing the reproduction of power relationships through resistance. In the terms proposed by Awol Allo (2016), Maria Soledad used the judicial space to go beyond the surface of the problem. She resignified the process of subjectification. Maria Soledad, accused of being responsible for the organization of ETA’s *comandos*, accused the Spanish state of being responsible for the ill treatments. In this context, as Allo stresses, “Trials can be performatively reinverted and used for contestation and intersubjective meaning-making in ways that break with the normative expectations of its actors” (Allo, 2016: 64).

The production of subjects by the judicial discourse can be rethought from this perspective of resistance. However, as I mentioned above, power affects women in particular ways. Therefore, what is performatively reinverted in a trial has a particular impact on women’s convictions from the perspective of their production as subjects.

When observing the media discourse, the production of ‘women terrorists’ becomes more explicitly related to gendered roles. Normally, focus was placed on the fact that both Maria Soledad and Iratxe were chiefs, that both of them had

responsibilities related to coordination within the organization. Both were described as cold-blooded terrorists who had the capacity as a man to exercise violence. In contrast, in the case of Ainara Urkijo, the media discourse emphatically stated that there was a “group of *proetarras*” and a young woman. And later, since the element related to terrorism was left aside, she was not even relevant to the media. The only mentions the media made of her was that she was the only person in the group not being incarcerated.

With regard to the discourse of victims’ organizations, the production of subjects has an explicit aim. These organizations represent the interests of victims; therefore, the associations between terrorism and monstrosity are fundamental to building their claim. Men terrorists are monstrous, but women terrorists are even more so. However, since there are fewer statements made by organizations than there are rulings or newspapers articles, these statements can only operate as an indication of the organizations’ aim. Observing their values or statements against terrorism more generally and linking them to the case of Maria Soledad provides an indication of how the discourse of these organizations functions to produce subjects.

These narratives of production of subjects that I have observed in *discourses* establish the difference between the production of ‘terrorists’ and ‘women terrorists.’ Women who exercise political violence seems to have a psychological disturbance, “if they have a choice at all” (Gentry & Sjoberg, 2015).

Discourses that are well ingrained in society as ‘common sense’ are obstacles for the progress of certain social groups, such as women. In this case, traditional notions of gender divide people into two groups, with the presumption that there is a natural, biological difference between the two sexes<sup>52</sup> (there being only two possible sexes in the man/woman binary).

Gender is produced through discourse. And within the context of this matrix of subjectivities, gender exists alongside another: ‘terrorist.’ Therefore, researching

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<sup>52</sup> For traditional and conservative positions sex and gender have the same significance even though in this thesis I consider they are not.

and analyzing discourse and the production of subjects can help to understand these gendered power configurations.

## V. Conclusion

In this thesis, I have analyzed how ‘women terrorists’ are produced by the *discourses* of three different actors that are relevant in the production of subjectivities and the reproduction of power dominance.

However, there is an aspect of this production that I have not yet addressed: how ‘women terrorists’ are produced as subjects in the prison system. In the sense in which Natacha Chetcuti-Osorotivz and Mary Corcoran have observed, the logics established in prison are different from those that exist in a courtroom. Therefore, the power dynamics are different, as well.

From the perspective of feminist CDA, I have observed that gender, as an additional element to be taken into account when observing discourses from a critical viewpoint, is also a critical focus on the self-reflexivity of any analysis.

Although CDA is a powerful tool for analyzing power relationships that are intertwined in *words*, when it comes to deconstructing power itself, this method does present the difficulty of a lack of analysis on how power affects individuals differently according to the production of the given subject.

Researchers analyzing power relations and power structures must consider that we as scholars are also being produced as subjects in this matrix, adding the layer of ‘gender’ to our own standpoint. According to Michelle Lazar,

[R]eflexivity is manifested in institutional practices, with implications for possibilities for change in the social and personal attitudes and practices of individuals. Second, there needs to be on-going critical self-reflexivity among feminists keen on achieving radical transformation of gendered social structures. (Lazar, 2010:13)

Gender bias will exist throughout the production of our research processes, and we should reflect on this fact.

The Basque Country has a complex society. Power narratives and political violence have introjected both Basque society and the way that the other regions

of Spain view it. Consideration of additional elements through feminist CDA allows us to address the debate of the Basque conflict with more tools in order to include diverse perspectives and silenced voices.

## VI. Appendix

*Sumario 6/1998*. January 21<sup>st</sup>, 2021.

Maria Soledad Iparagirre was acquitted on two occasions. The first was regarding the crimes of provocation of devastating material damages, attempted murder, and injuries for the events occurred on December 28<sup>th</sup> of 1998, in which three men—part of a *comando*—planted explosives in different areas of the town of Oviedo in Spain.

The Prosecutor accused Maria Soledad of being a necessary collaborator in the events, given her participation in ordering execution of the plan and having provided the explosives to the *comando*. According to the judge's ruling, it was not proven according to the produced evidence that she had any participation in the events as a co-perpetrator or even in a coordinating role. She was therefore acquitted of all charges.

*Sumario 62/1994*. March 2<sup>nd</sup>, 2021.

In this case, Maria Soledad was convicted for organizing an act of terrorism and providing the material conditions to execute them. The act itself was the manufacturing of an explosive device with information provided by Maria Soledad in an attack on a bank in Getxo, a town in the Basque Country in September 1994.

After the conviction of the men considered perpetrators of the events, Maria Soledad was convicted for her role as liaison between the *comando* and the organization, for facilitating material conditions, and for selecting targets. For this participation, she was convicted as a necessary collaborator in the events.

*Sumario 54-1995*. March 16<sup>th</sup>, 2021.

In this case, the Prosecution accused Maria Soledad of giving the next target to *Comando ITSASADAR*, which attacked members of the national police.

According to the ruling, this process is relevant given that witnesses in the case, already convicted as material perpetrators of the events, named her as 'Anboto', and as their superior. Therefore, she was convicted for assault on authority that provoked the death of an officer and attempted murder.

*Sumario 60-1985.* March 29<sup>th</sup>, 2021.

In this case, Maria Soledad was also acquitted of the charges of terrorist provocation of devastating material damages and several attempted murders. The events occurred in Vitoria in May of 1985, when *Comando Araba* placed a bomb in the village's sports complex. Through the sentence, Maria Soledad was identified as part of the organization by the other witnesses, who were also indicted on the same charges. However, since her participation in the event was only corroborated by a fingerprint taken at the moment of the crime, the judges ruled that, due to the time that had passed and the material conditions of reproduction of evidence, Maria Soledad should be acquitted given that there was reasonable doubt.

*Sumario 37-1985.* April 27<sup>th</sup>, 2021.

In this case, Maria Soledad was prosecuted for having participated in the assassination of a post office employee in 1985. This case was within the context of terrorist acts committed by *Comando Araba*, to which Maria Soledad belonged along with other two men. She was found guilty of murder, with the aggravating condition of premeditation as co-perpetrator.

*Sumario 43-1988.* May 14<sup>th</sup>, 2021.

Maria Soledad was accused in 1989 of belonging to a terrorist group, provocation of devastating material damages, and attempted murder for the manufacturing of an explosive device placed in a bar at Eskoriatza, a town in the Basque Country.

In 2021, she was convicted of attempted murder and damages caused by the explosion after her fingerprints were found on the explosive device.

*Sumario 92-1997.* November 16<sup>th</sup>, 2021.

This case was against Maria Soledad for providing targets and the material conditions to cause an explosion 1996 in Amurrio, a town of the Basque Country.

She was convicted of terrorist provocation of devastating material damages as a necessary collaborator and, in this trial, it was relevant that Maria Soledad recognized using the alias 'Anboto' as a member of ETA's military apparatus.

## VII. References

Allo, A. (2017) 'Marwan Barghouti in Tel Aviv: Occupation, Terrorism, and Resistance in the Courtroom' *Social & Legal Studies*, 26(1), 47-68.

Barlett, K.T. (1990) *Feminist legal theory*. New York: Routledge.

Benton, S. (1995) Women disarmed: The militarization of politics in Ireland 1913-23, *Feminist Review*, 50(1), 148-172.

Chetcuti-Osorovitz, N. (2021) *Femmes en prison et violences de genre. Résistances à la perpétuité*. La Dispute: Paris.

Chiarotti, S. (2006) "Aportes al Derecho desde la Teoría de Género" En *Otras Miradas*, vol. 6, núm. 1, junio, 6-22. Venezuela: Universidad de los Andes.

Corcoran, M. (2006) *Out of order. The political imprisonment of women in Northern Ireland 1972-1998*, Cullompton: William Publishing.

De la Cuesta, J.L. (1986) "Atenuación, Remisión de la pena e Indulto de Miembros de Grupos Terroristas". *Cuadernos de política criminal*, n° 30, pp. 559-602.

Deveux, M. (1994). Feminism and Empowerment: A Critical Reading of Foucault. *Feminist Studies*, 223-247.

De Pablo, S. (2015) *La Patria Soñada. Historia del nacionalismo vasco desde su origen hasta la actualidad*. Madrid: Pretérita.

Fairclough, N. (2012) 'Critical discourse analysis', in Gee, J. P. & Handford, M. (2012) *The Routledge Handbook of Discourse Analysis*, Routledge: New York.

Foucault, M (1978) *The History of Sexuality. Volume 1: An Introduction*. New York: Pantheon Books.

———— ([1978] 2001) *La Verdad y las Formas Jurídicas*. Buenos Aires: Gedisa.

----- (1982) 'The Subject and Power'. *Critical Inquiry*, 8(4), 777–795.  
<http://www.jstor.org/stable/1343197>

----- (1991) 'Politics and the study of discourse' in G Burchell, C Gordon and P Miller (eds) *The Foucault Effect: Studies in Governmentality: With Two Lectures by and an Interview with Michel Foucault*. Chicago: Chicago University Press.

———— (2009) *Vigilar y Castigar*. Buenos Aires: Editorial S.XXI.



García García, M.I. (2020) 'El proceso de radicalización yihadista de mujeres en España: un análisis sociopolítico', *Revista de Derecho Penal y Criminología*, n. 23, 153-172.

Gentry, C., & Sjoberg, L. (2015). Female terrorism and militancy. In R. Jackson, *Routledge Handbook of Critical Terrorism Studies* (pp. 313-331). London: Routledge.

Goodrich, P (1984) 'Law and Language: An Historical and Critical Introduction' *Journal of Law and Society* 11(2), 173-206.

Hamilton, C (2007a) 'The gender politics of political violence: Women armed activists in ETA' *Feminist Review* (86), 132-148.

----- (2007b) *Women and ETA. The gender politics of radical Basque nationalism*. Manchester University Press.

Haraway, D. (1988). Situated Knowledges: The Science Question in Feminism and the Privilege of Partial Perspective. *Feminist Studies*, 14(3), 575. doi:10.2307/3178066

Heim, D. (2016) *Mujeres y acceso a la justicia*. Buenos Aires: Ediciones Didot.

Hemmerich, F. (2020) [Outlaw girls escape from prison: Gender, resistance and playfulness](#), *Punishment and Society*, Volume 22 Issue 2, April 2020, pp. 207-226.

Hook, D (2001) 'Discourse, knowledge, materiality, history: Foucault and discourse analysis'. *Theory and Psychology*, 11(4), 521-547.

Hunter, R., Mc Glynn, C. & Rackley, E., (2010) *Feminist judgments From Theory to Practice*, Bloomsbury Publishing: London.

Kohen, B. (2000) 'El feminismo jurídico en los países anglosajones: el debate actual' en Birgin, Haydée (compiladora), *El Derecho en el Género y el Género en el Derecho*, Buenos Aires: Biblos.

Lacroix, I. (2011) 'Les femmes dans la lutte armée au Pays Basque. Représentations, division sexuelle du travail et logique d'accès à la violence politique' *Champ pénal/Penal field* [En ligne], Vol. VIII.

Lazar, M. M. (2007). Feminist Critical Discourse Analysis: Articulating a Feminist Discourse Praxis'. *Critical Discourse Studies*, 141-164.

Mackinnon, C. (1987) *Feminism unmodified*. Massachusetts: Harvard University Press.

Melzer, P. (2011) Maternal Ethics and Political Violence: The 'Betrayal' of Motherhood among the Women of the RAF and June 2 Movement. *seminar* 47.1 (February 2011): 81-102.

----- (2015) *Death in the Shape of a Young Girl: Women's Political Violence in the Red Army Faction*. New York, NY and London, UK: New York University Press.

Morse, J. (1995) 'The significance of saturation' *Qualitative Health Research* 5, 147–49

Naffine, N. (1990) *Law & the sexes. Explorations in feminist jurisprudence*. Australia: Allen & Unwin.

Olsen, F. (2009) 'El sexo del derecho', en Ávila Santamaría, R., Salgado, J. y Valladares, L. (Comps.) *El género en el derecho. Ensayos críticos*. Ecuador: Ministerio de Justicia y Derechos Humanos.

Pando Canteli, M. J. y Rodríguez Pérez, P. (2020) 'Las mujeres de ETA: activismo y transgresión' *Arbor*, 196 (796): a554.

Pryse, M. (2000). Trans/Feminist Methodology: Bridges to Interdisciplinary Thinking. *NWSA Journal*, 105-118.

Rodríguez Lara, Z. (2013) 'Las mujeres de ETA en la prensa escrita', *Mediatika*, 14, 2013, 151-167.

—————, Z. (2017) 'Motivaciones, ingreso y experiencias participativas de las mujeres en ETA' *Política y Sociedad*, 54(2), 421-441.

Scales, A. (2006) *Legal Feminism. Activism, lawyering and Legal Theory*, New York University Press: New York.

Scott, J. (1996) "El género: una categoría útil para el análisis histórico", en Cangiano María Cecilia y Dubois, Lindsay, Lindsay, *De mujer a Género, teoría, interpretación y práctica feminista en las ciencias sociales*, CEAL, Buenos Aires. Selección.

Smart, C. (1989) *Feminism and the Power of Law. Sociology of law and crime*. London, Routledge.

Smart, C. (2000) "La teoría feminista y el discurso jurídico", en Birgin, Haydée (compiladora), *El Derecho en el Género y el Género en el Derecho*, Buenos Aires, Biblos, pp. 31-71.

van Dijk, T. A. (1999). El análisis crítico del discurso. *Anthropos*, 23-36.

----- (2003) The Discourse-Knowledge Interface [online]. In: G. Weiss and R. Wodak, eds., *Critical Discourse Analysis. Theory and Interdisciplinarity*. New York: Palgrave Macmillan, pp. 85–108.

----- (2018). Socio-cognitive discourse studies. In J. a. Flowerdew, *The Routledge Handbook of Critical Discourse Studies* (pp. 26-43). New York: Routledge.

Velte, S., (2018) Oñati's youth facing the armed conflict: analysing the discourses of the first post-conflict generation. *Oñati Socio-legal Series* [online].