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Clashing Ideals of Citizenship: Norms of Inclusion and the Middle East

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CLASHING IDEALS OF CITIZENSHIP:

NORMS OF INCLUSION AND THE MIDDLE EAST

by

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ABSTRACT

CLASHING IDEALS OF CITIZENSHIP:
NORMS OF INCLUSION AND THE MIDDLE EAST

by

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The University of Wisconsin—Milwaukee, 2017
Under the Supervision of Professor Aneesh Aneesh

Modern conceptions of citizenship are in a state of flux, and, as such, so are our ideas about

belonging. Ascriptive norms of membership based on the location of one's birth—*jus soli*—or

familial lineage—*jus sanguinis*—have provided the groundwork for membership where being

designated a "citizen" can provide significant legal, economic, and social advantages over those

outside the status. Naturalization, dual citizenships, and citizenship-by-investment programs

(CIPs) have made citizenship more inclusive, less tied to a specific group, and more responsive

to the needs of the individual. Further, instead of a citizen's rights stopping at the border of the

nation-state, liberal citizenship norms constructed around the cornerstone of universal human

rights are gaining momentum. This research examines the spread of these liberal citizenship

norms and their relations to political regime, inequality, and territory. A qualitative content

analysis of citizenship laws from 198 countries was performed. The results suggest that while

liberal citizenship norms have gained momentum in recent history, the adoption is not

universal, with non-authoritarian regimes tending to utilize these norms at higher rates than

their authoritarian counterparts. Further, there is on-going caution surrounding dual citizenship

and CIPs. To examine these concerns, this study outlines the spread of dual citizenship regimes

and creates a log of extant CIPs. Finally, a case study of liberal norm non-adoption is outlined using the citizenship laws of the Gulf Cooperation Council (GCC) countries. The results from this example highlight the complex set of variables affecting transnational norm adoption, where a region's history, economic relationships, culture, and attitudes toward immigrant groups all play a role in the decision-making process.

To

my wife,

my parents,

and my grandparents

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CIA	Central Intelligence Agency (US)
CIP	Citizenship-by-Investment Program
EU	European Union
EUDO	European Union Democracy Observatory on Citizenship
FDI	Foreign Direct Investment
GCC	Gulf Cooperation Council
ICT	Information and Communication Technology
IGO	Intergovernmental Organization
INGO	International Non-Governmental Organization
ISO	International Organization for Standardization
KSA	Kingdom of Saudi Arabia
OECD	Organisation for Economic Cooperation and Development
QCA	Qualitative Content Analysis
UAE	United Arab Emirates
UN	United Nations
US	United States

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Chapter 1
Unequal Protection Under the Law

In 2005, Nour Miyati was a newly relocated Indonesian domestic worker in Saudi Arabia, joining the other approximately 1.5 million domestic laborers from South East Asia, including Sri Lanka, the Philippines, and her home country (Human Rights Watch & Varia 2008). She had come to Riyadh, after previously fruitful employs in other households in Medina and Ta'if. While in those positions, she noted that her employers "were good and provided my full salary" (Human Rights Watch & Varia 2008:35), traits all guestworkers—generally defined as foreign born workers who have immigrated to another country to fill a specific job title—hope to encounter. However, in Riyadh she faced a different situation while serving a new family. She was frequently beaten by both of her employers—a husband and wife—and in a 2008 Human Rights Watch report outlining domestic worker abuse in Saudi Arabia, graphically recounted being repeatedly struck on the head and face, hit on the feet with sharp high heeled shoes, losing a tooth from being punched in the mouth, and having her fingers repeatedly pounded until they swelled. After a particularly harsh beating, her employers forced her to wash her hands with a full cup of bleach, presumably to disinfect the numerous injuries and prevent infection from setting in.

Miyati's abuse was not limited to the physical pain. She endured excessive periods of work where she "…never got a chance to rest, I woke up at 4 a.m., made breakfast and worked all day without rest. I went to sleep at 3 a.m." (Human Rights Watch & Varia 2008:35). Her employers frequently locked her in the house, preventing her from even leaving to throw out household garbage. They withheld her pay and confiscated her passport to limit her

movements if she attempted escape, as guestworkers caught without proper identification could be immediately returned to their employers, jailed, or deported (Human Rights Watch & Varia 2008). On one occasion, Miyati managed to escape and took a taxi to a local police station, seeking asylum. She was met there by her male employer, who was a police officer. When she attempted to resist removal from the station, he forcefully took her home saying that she hadn't "finished [her employment] contract yet, it should be two years." (Human Rights Watch & Varia 2008:35).

As punishment for her escape attempt Miyati was severely beaten, bound and locked in the house's bathroom, and went unfed for long periods of time (BBC 2008; Human Rights Watch & Varia 2008). To prevent attempts to communicate with their neighbors, her employers taped her mouth shut. After almost a month of this treatment, Miyati convinced her employers to take her to a doctor to receive treatment for her numerous injuries. Her examination revealed that she had contracted gangrene during her lengthy restraint; a condition that led to the amputation of multiple fingers and toes.

While being examined, her doctor reported the abuse to the proper authorities, who proceeded to investigate the claims against her employers. The criminal proceedings for the case stretched over three years, during which time Miyati languished in the Indonesian embassy shelter for displaced guestworkers. Initially, a Riyadh court convicted her of making false allegations against her employers, sentencing her to 79 lashes; a decision that was later overturned (Human Rights Watch & Varia 2008). Her female employer initially pleaded guilty to the abuse charges, receiving a sentence of 35 lashes; a sentence that was, too, later overturned (BBC 2008). All charges against her male employer were dismissed. In the end, Miyati was

awarded 2,500 riyals (approximately $668.00 US) compensation for her injuries. Both the Indonesian embassy and Human Rights Watch have sought an appeal of the verdict, but as of this writing, the case has not been reexamined (BBC 2008; Human Rights Watch & Varia 2008). Instead, it has left a "dangerous" precedent "that they [Saudi employers] can beat domestic workers with impunity and that victims have little hope of justice." (BBC 2008).

One can interpret Miyati's experiences with her employers as an individual case of abuse, or worse, as part of a larger pattern of abuse that many domestic workers might be facing in Saudi Arabia. Both would be valid concerns. However, this dissertation focuses, not on the abuse, but on an underlying factor that acts as a condition of possibility for abuse: citizenship status. First, Miyati's legal options for recourse were limited as she was not deemed a citizen. As such, she did not have access to the same sets of protections that a Saudi citizen would under similar circumstances. Her attempts to get help were not taken seriously until she had suffered significant injuries. In addition, the legal recourse to her employers' wrongdoing was virtually non-existent. Second, the local culture and its orientation toward the immigrant status of guestworkers played a role. Her employers viewed her as an indentured servant, and as discussed further throughout, guestworkers are largely viewed as an expendable population that can be hired and fired at will. While their presence is necessary to perform the jobs nationals do not want to do—such as manual labor or domestic work –they are deemed an unclean group (Kanna 2011). The presence of guestworkers and non-nationals is tolerated due to their need, as long as they stay in "their" neighborhoods. Any incorporation into the larger, national body is barred as admitting them might somehow tarnish the rest of the citizenry (Douglas 1994; Kanna 2011). The third main area that affected Miyati's experiences is within

the economic realm. She did not receive the pay she was contracted to earn from her employers, as have numerous other guestworkers. As with her lack of recourse against physical abuse, she was similarly limited in her efforts to secure her earnings.

Despite numerous elements at play, a single larger issue underlying the possibility of Miyati's, and other guestworkers', experiences are their citizenship status. As a member of the national group, one gains legal protections that prevent the sorts of described abuses, while also ensuring that employers who refuse to treat their employees fairly are penalized. For most of us, one's birth status determines one's access to political, social, and economic rights, but the breadth of those rights is limited by national jurisdictions. Our rights are only applicable within a specific realm. If someone chooses to cross a national border, their rights may stop, or be truncated, at that point. In this way, citizenship is still tied to the nation-state. As such, one's rights are dependent on their location, but also on the legitimacy of those who guarantee them.

For guestworkers and refugees, this can become a significant issue as they traverse borders for work or to flee violence. Once they leave their homeland, their basket of rights shrinks. What this means is that their options in their current country are severely limited according to how they are seen by the government. One's rights are only extant in a specific area, once they leave the area, they forfeit those protections. While this state based rights regime has been relied upon since the foundation of the institution of citizenship, there has been a push to rethink what it means to belong. Soysal (1994) and others have highlighted the development of citizenship regimes based on the concept of universal human rights. As such, one's location of birth should not limit the types of protections they have, but the mere fact that they are human should act as a safeguard against potential abuses. Many European states

have tailored their rights regime to the United Nations human rights regime. These human

rights based approaches would, ideally, prevent employee abuse since they would have the

same protections as native-born citizens. While these approaches are becoming more popular

with governments, scholars, and advocates, they are not yet universally accepted. This

dissertation highlights the world-wide institutional shifts in citizenship, and their links to

inequality.

The tragic case of Ms. Miyati may appear to be an aberration, but her situation is

illustrative of numerous ethical, structural, and economic issues in the domestic labor market of

wealthy nations in general, and its practice in the Gulf Cooperation Council (GCC) countries, in

particular. The breadth of domestic guestworker abuse in Saudi Arabia is unknown, but

believed to be widespread.

> No data exists to calculate accurately the number of women migrant domestic workers
> who confront violations of labor rights and other human rights…*gaps in the labor code
> and restrictive immigration practices heighten domestic workers' risk of abuse*. (Human
> Rights Watch & Varia 2008:2; italics mine)

Questions arise regarding what legal protections foreign workers (both female and male) have

access to, what organizations ensure proper monetary compensation for their labor, and who

guarantees their safe passage to-and-from their home countries?

It is within these uncertainties of rights that I seat this research. The precariousness of

guestworkers' statuses are emblematic of the inconsistencies within existing citizenship rights

regimes. The rights one receives in one nation-state are not guaranteed once they cross the

national boundary. As such, different protections and opportunities are available to different

groups, resulting in different opportunities or life choices. Traditionally, the status of "citizen"

was a sign of a relationship between the individual and the state, which was passed onto future

generations either by birth within the national borders or by inheriting the status from one's parents. It showed that the individual was "one of us" and had legal access to various sets of rights. More recently, there has been an international push towards liberal citizenship norms, which espouse a more inclusive form of citizenship. These norms push away from the ascriptive rights of birth and blood, and instead suggest that citizenship is a more fluid state where individuals can access other sets of rights by joining groups they were not born into.

This task of grouping is increasingly accomplished via naturalization, dual citizenship, and citizenship-by-investment programs (CIPs). What this research shows, is that these norms are becoming increasingly common on the national stage, with most countries adopting not only naturalization policies (however limited), but also legally allowing their citizens to hold citizenships in other countries; effectively legalizing individuals holding multiple sets of rights. The extreme approach to these expansions, and potentially exploitation of dual citizenship, can be found in the rise of CIPs, where individuals of economic means can purchase additional citizenships, thereby purchasing additional sets of rights.

Further, this work questions the spread of these liberal citizenship norms. Not only by tracing the rise of the norms themselves, but also by examining who can get access to them and what types of political regimes are employing these scripts of membership. As such, issues of inequality are fundamental here. Global economic inequality can be seen in the choices that guestworkers make when deciding to enter potentially dangerous work agreements. Further, those who can afford to purchase CIPs buy rights others cannot afford, thus giving themselves a variety of advantages. A similar inequity can also be seen at the national level when looking at which countries participate in CIPs. Who is selling documents and who is buying access can be a

signal of globalization's "winners," or those who are benefitting the most from transnational

agreements. Within the context of "winners" and "losers," the importance of status is essential.

Guestworkers are left outside of citizenship in most cases, thereby forcing many to endure the

hardships outlined in the previous example without the option of legal recourse. Within the

legal realm they are non-persons.

Further, guestworkers employed as domestic labor occupy a conflicted position. As they

emigrate from their homelands in search of work, these workers become part of the household,

and important agents of social reproduction. They are the primary source of childcare, and

actively maintain a clean household while providing daily meals for the family. In this sense,

domestic guestworkers are sources of social reproduction for their employers (Glenn 1992;

Maher 2004). They are the ones who take on the female gender-typical role of raising children

and taking care of the household. While they are tasked with such important work, they are

also institutionally marginalized in many places (Parreñas 2001; Vora 2013).

Here, the conflict inherent in their position is on display. Despite being perceived a

necessary source of labor, they are viewed as disposable or interchangeable parts of the

system. Families employing domestic laborers use those workers as a sign of prestige, and,

thereby, a physical symbol of wealth and importance. Being able to employ a guestworker

shows that employers can not only afford to pay the worker, but are knowledgeable enough to

navigate the legal processes required for acquiring the worker, in the first place. Employers

know which forms to file to "import" their employees, provide housing and sustenance to

workers, and, in some cases, pay for their workers' travel back to their home country (Maher

2004). As such, there is a significant economic burden associated with employing a

guestworker, but the reward to the employer includes both functional and conspicuous consumption of their labor.

The physical and mental abuse noted previously may be the most apparent forms of danger confronting workers, but they are also expected to make additional sacrifices in less obvious areas of their lives. Traveling to a new country for employment requires a considerable commitment. The individual must brave the uncertainty of their future work environment, unpredictability of their travel arrangements, and suffer the emotional toll of long-term separation from their friends, family, and home. These sacrifices hide many risks confronting all guestworkers. First, their travel from the sending country to the receiving country is often fraught with dangers. If the guestworker has not been represented by a company that deals in the logistics of foreign work—for example, an employment agency—the process of getting to the foreign region may be the worker's responsibility. That said, the hiring family may be financially responsible for all travel or the worker may be forced to rely on illegal means to cross borders, such as *coyotes* or other human traffickers (Human Rights Watch & Varia 2008; Maher 2004). Putting one's life in the hands of traffickers significantly increases the risk for the individual as they risk being swept into sex trafficking rings, or simply deserted in a foreign land (Maher 2004).

Once the guestworker has reached their destination, they now must endure the contradictions of her position, especially if working in the domestic realm. In many cases, part of the work a domestic guestworker undertakes is childcare. As such, she acts as a "live-in" nanny who provides primary care to the children in the household. This causes a conflict between her public and private roles. In the public sphere, or her work life, the guestworker

devotes her time to seeing to the needs of her employers' family. However, the conflict develops in that she may have left her own children and family back in the home country to gain employment. This discord highlights the sacrifices of domestic guestworkers (Human Rights Watch & Varia 2008; Parreñas 2001). Given the patriarchal normative systems from which many guestworkers emerge, the decision to leave home casts the woman as someone shirking her responsibilities. What she has left behind is a situation where her children and other dependent family members are now in the care of family members, relatives, friends, or paid caretakers.

Once in the receiving country, domestic guestworkers may have their movements limited by their employer or national policies. As noted in the case of Miyati's confinement and abuse, such an extreme level of control can have significant negative effects on guestworkers. In the case of the GCC countries—Saudi Arabia (KSA), Kuwait, Bahrain, Qatar, the United Arab Emirates (UAE), and Oman—a formal system of employer sponsorship has been developed. Called the *kafala* system, the process requires potential employers to "vouch" for the foreign worker prior to their arrival. This means that the employer is responsible for the economic and legal well-being of the worker during their contractual period, and the employer is responsible for at least a portion of the repatriation costs at the contract's conclusion (Gardner 2011; Longva 1999). The system's intended purpose was to create "a relationship that functioned as a mechanism for hosting foreigners in the close and genealogically framed societies typical of the Arabian Peninsula" (Gardner 2011:8). GCC countries needed foreign labor to fill low-wage and low-skill occupations, and the *kafala* system was used to expedite the hiring process.

However, the system brought with it some troubling attributes. One of the legal

structures enabling the possibility of abuse I outlined earlier pertained to the requirement that

sponsors must approve of an employee's departure from the country or for them to change

employers (Human Rights Watch & Varia 2008; Gardner 2011; Longva 1999; Shemeena 2015).

Given that the employer has the "final say" regarding their employee's travel and whereabouts,

a situation of vast inequity is created. The employer can, effectively, dictate every aspect of the

employee's life while under contract, and the employee has little power to hamper abusive

relationships. As shown in the opening example, even if an employee is being severely abused,

the local authorities give credence to the employer's claims. Related to this direct control,

employees are often required to surrender their identification documents—including

identification cards and passport—as part of the employment process (Longva 1999). Failure to

do so could result in the termination of their work contract, and, in turn, deportation back to

their home country.

Such control of workers' employment outcomes is not limited to their contracted time,

as the reaches of employer influence extend past their documented sponsorship period. As part

of the *kafala* system, employer-sponsors hold the right to approve future in-state contracts for

the worker (Human Rights Watch & Varia 2008; Gardner 2011). For example, consider a

hypothetical case of an Indonesian domestic guestworker finishing her contractual period with

a family in Dubai. She has had a, comparatively, good experience with the family; they have

paid her on time and adequately provided her with safe shelter and food. Based on this positive

experience, she seeks employment with a new family in another region of the UAE. Prior to

being transferred to this new family, her previous employer is required to approve her staying

in the country, and her transfer. Now, if she had a positive experience with her previous employer, they may be likely to approve the transfer, and, thereby, terminate their responsibility and control over her. However, if she had a negative experience—or even an unremarkable experience—with her previous employer, they could elect to deny her transfer; effectively forcing her to return to her homeland. Once she has been deported, she is free to reapply to an employment agency in her home country, and be hired out to a new job in any country they service, even to the UAE.

Essentially, what the approval/disapproval of new jobs reiterates are the differences inherent in the statuses of employers and guestworkers. Between citizens and non-citizens. The noted Human Rights Watch conclusion that abuse directed towards foreign born domestic workers helps to show the protections guaranteed for citizens, in many nations. Further, this finding highlights the different protections extended to workers in differing regions. While the protections to a worker in the Middle East may be limited, a worker in the United States or Europe can access a different set of rights simply due to the nation-state they are employed in. For example, a guestworker in a European Union (EU) member country must be provided a pathway to citizenship after five years of lawful residence and employment (Papademetriou 2013), thus making an EU job, potentially, more valuable to workers than one based in the Middle East, regardless of their monetary compensation. Citizens may be able to seek recourse for any injuries they have sustained during work, while non-citizens may be forced to endure their wounds while on-the-job, at risk of losing their position. Reporting unsafe working conditions, personal injury, or an employer's failure to compensate their workers may not be an option for non-citizen. Citizens have the freedom to report their troubles to the police, and in

most cases, the police will hear the complaints and begin an investigation, where warranted. However, as noted previously, this is not an option for many non-citizens. Instead of receiving support from the authorities, non-citizens—much like other marginalized groups—may face personal harm in simply reporting transgressions (e.g. threats of violence, loss of employment, or deportation). In addition, if such reports and statements are collected by authority figures, that does not mean that each report is treated equally. Non-citizens' reports may be viewed with an air of skepticism due to the complainant being a member of the outgroup. This distinction between "us" and "them," or the "other," is one that will come up again during discussions of citizenship, and acts as a central theme in the questions posed here.

The issues surrounding guestworkers' relationships with the state do not just end with the workers, themselves. Instead, the status of a guestworker's family's citizenship status could be complicated depending on the national laws in place. Consider the UAE's views on the subject. According to The Law Library of Congress' (Saliba 2013) examination of extant guestworker programs, the UAE's program is not a path to citizenship, but one leading solely to work. "Residency permits granted to migrant workers are for a limited period of time and *cannot lead, regardless of the length of residence to citizenship or permanent residency"* (Saliba 2013; italics mine). As such, foreign born workers are immediately seen as a separate group. A group that cannot be assimilated into the dominant culture, and is thereby not the same as—or equal to—a UAE citizen.

As an illustration of this point, I recount a second example of a state's view of guestworkers as disposable, and the differences in protections offered to citizens and withheld from non-citizens: the *bidoon* living in the UAE. Roughly translated from Arabic to mean

"without," the term has been applied to stateless people in the Middle East (Abrahamian 2015; Sloan 2015). Essentially, the *bidoon* are without a legal homeland. An individual may be born in the UAE to a documented Pakistani guestworker, but that does not guarantee UAE citizenship. Given the heavily restrictive citizenship requirements utilized by much of the Middle East— including the GCC countries discussed in Chapter 6—citizenship is a status inherited from one's birth father, while there are current popular pushes toward allowing citizenship to pass from mother to child. Citizenship is, thereby, passed on to a father's children, comparable to passing on genetic material.

Abrahamian (2015) also notes the marginalizing approach toward the *bidoon* used by high ranking Emirati. Many individuals directly depend on the daily contributions of guestworkers, and would be negatively impacted by the complete dissolution of the status. However, these workers are viewed as a potential source of local economic drain. UAE citizens can draw substantial economic benefits from the state's existence as a rentier state. Individuals receive a no-strings-attached $55,000 stipend, free land to build a house—which can be financed with a no-interest loan—, and access socialized healthcare and education, based purely on their status as citizen (Abrahamian 2015). This money is sourced from the earnings the UAE government acquires by "renting out" land access to companies searching for oil. Some scholars (Abrahamian 2015; Beblawi 1987) suggest that these annual payments are a useful mechanism to maintain the status quo. Popular uprisings are less likely to take hold if citizens are kept, relatively, placated. These monetary allowances further help minimize the popularity of more inclusive citizenship policies, as discussed in Chapter 6. Providing pathways to

citizenship means there will be more citizens to split the rentier profits between, thus lowering the amount everyone receives.

The lack of *jus soli* citizenship law and severely restricted naturalization opportunities in the UAE create a troublesome situation for guestworkers and their families. The workers are heavily incorporated into the daily lives of their employers and urban areas, but are considered what Vora (2013) termed "impossible citizens." Workers bring their home cultures with them when they migrate to a new area. As such, their beliefs and daily practices are brought to their new geographic home. To better serve the worker populations, local businesses may start catering to their needs by carrying foods and clothing from their homelands. It is through this availability of material and cultural goods that guestworkers' practices can have an influence on the region's dominant culture. Citizens may start consuming workers' traditional foods at restaurants and street carts. Further, cities may take on an international "feel" by having districts devoted to different working groups—i.e. an Indonesian neighborhood or a Filipino one. Despite being institutionally kept out of the citizenship process, guestworkers can have a significant lasting impact on their locale (Vora 2013; Vora & Koch 2015).

Further, citizenship has also been an indicator of worth, a worth that is measured in terms of the rights members could access (Aneesh & Wolover manuscript; Bosniak 2006; Marshall 2006). Initially, the status of *citizen* was an indicator of social and economic status. Holding the title in the United States and Europe often meant that an individual was a property-owning (white) male, who could actively participate in the local government (Ignatieff 1987; Mann 1987). Citizenship, then, was a way to identify groups who *deserved* the status (Joppke 2010). Groups who had the highest social and/or socioeconomic status, seen as contributing to

the wealth of the nation, and whose work was valued, became citizenships since they had

"worked hard" to gain the right to be included (Davidson 2000; Hobson 2005). As Hobson

(2005) notes when discussing Pateman's development of *Wollestenscraft's Dilemma* on gender

and access to citizenship, those whose work was economically valued (i.e. work taking place

outside of the private sphere of the family and household) were repaid with citizen's rights.

Extending the idea of worth across gendered lines, Joppke (2010) applies a similar examination

when accounting for historical status and access to citizenship. Within this scope, the dominant

group's view of the individuals in question—be they ethnically or racially disparate, or foreign-

born—is instrumental in their likelihood toward inclusion. Individuals originating from groups

who were viewed as lazy were barred from gaining citizenship, while those belonging to "hard

working" groups gained access to the rights (Joppke 2010).

The *republican* form of government arose from this particularistic process. Citizens,

essentially, created the laws they followed (Leydet 2014; Marshall 2006; Marshall & Bottomore

1992; Mouffe 1992). Individuals took turns holding office, thereby giving all citizens the

opportunity to enact policy addressing their concerns. Ultimately, what citizens gained under

this regime was the duty to participate in the political system. By doing so, it called for citizens

to put their personal goals and desires aside, for the betterment of the state (Joppke 1998;

Marshall 2006). Their duty was, then, paid for by the rights they enjoyed. While republican

citizenship never existed in its true form, early Greek city states came close to this ideal.

Liberal citizenship added the idea of protection to the *republican* typology. Within this

form, citizens could not only participate in the political process, as in the *republican* system, but

also gained the right to be protected by, and in some cases from, the state (Arendt 1973).

However, within the *liberal* form, political participation was limited to those citizens who chose

to participate, as opposed to participation as a "duty" that was present in the *republican*

system. A tripartite of citizens' rights also developed. In Marshallian (2006) terms, liberal rights

expanded from the solely political to include civil and social rights. Civil rights provided the

freedom of speech, thought and faith, property, legal contracts and the freedom for citizens to

choose their own work and pursue it freely, while being paid to do so. It is from this ability to

pursue one's own goals that allowed one the opportunity to become active in politics. Political

rights afforded the citizen in liberal systems to participate in the political process and run for

political office and hold that position, if so desired. The final prong of rights Marshall proposed

is more indeterminate: social rights. These rights outline the relationship between the state and

citizenry, and vary according to where one resides. In some areas, social rights include access to

a guaranteed minimum income. In others, it can mean access to state-funded public education.

Some states assure that citizens will have access to healthcare. The aim of social rights was to

make sure that citizens were kept in safe environments and had access to the tools necessary

for them to become full citizens, and able to utilize all the opportunities the state accorded

(Marshall 2006).

A final characteristic of Marshall's plan was the increasingly inclusive nature of

citizenship. As the idea of citizen evolved, it has, generally, been a status offered to more and

more people. Early forms of national citizenship were restricted to those born within the

country's geographic boundaries—*jus soli*—or those who inherited the status from their

parents via birth—*jus sanguinis*. Both methods sought to extend citizenship to a uniform group

of individuals who met some basic requirement. The "blood or soil" approach also distinguishes

between those who belong and those deemed "outsiders." *Our* people become those born in the same place and have some ties to the land. Alternatively, as with Anderson's (2006) concept of the imagined community, group members can rally around a shared national history and cultural signals that allow us to empathize with other citizens they have never met, or may never meet.

While the "blood and soil" method creates a straight-forward method of categorizing individuals (e.g. People are either born here, or not. Were their parents citizens?), it ignores a world where migration occurs. As a method to deal with the mass movements of people, citizenship processes were becoming increasingly liberal, developing procedures for "naturalization." No longer solely a lottery of birth (Shachar 2009), citizenship was something that could be gained, lost, or traded depending on personal needs. Institutional processes were developed to account for this flexibility. Individuals and families could undertake processes of naturalization to gain citizenship in their adopted country. In some cases, individuals held multiple citizenships, thereby helping them travel more easily. While these events and possibilities will be discussed at greater length in future chapters, it is worth noting here that citizenship, and many national conceptions of the status, came to reflect a changing, transnational world. As individuals, money, and goods found it easier to traverse national borders, our definitions of belonging shifted. Ideas and everyday practices have also found the journey between countries to be aided by our increased connections to one another. Within the context of this work, the spread and adoption of liberal citizenship forms (e.g. naturalization and dual citizenship) around the world become a marker of this connectivity, and

willingness to adhere to transnational liberal citizenship scripts (Aneesh & Wolover manuscript).

Running counter to this liberal approach to citizenship is what I call ascribed citizenship. This model primarily relies on historical models of kinship, land, and culture. To be a citizen, in this model, one would have to be born within a nation's borders, be a blood descendant of a citizen, or align oneself with the dominant ideology—religious, economic, or cultural. The opportunity for outsiders to gain citizenship in these states is largely closed unless individuals meet the characteristics outlined by the individual citizenship policy. Counter to the inclusive nature of liberal citizenship policies, the ascriptive model is an exclusive one. Immigrant groups are legally barred from gaining citizenship, as in the case of GCC countries mentioned above, and in many cases a class system is developed based on the rights one has access to.

Both examples detailing the legal statuses of guestworkers and members of the *bidoon* populations address a fundamental quandary in this research: who belongs and who does not? Who is a welcome addition to the local culture, and who is viewed as incommensurable? It is within this vein that I introduce the primary focus of this work: citizenship as a marker of identity and the rights that are paired with the status. At its heart, this focus can be further reduced to three pairs of conflicts, each of which will be the focus of future chapters. First, there is a clash between the acceptance of the "foreigner" via assimilation or multicultural processes, and the de facto separation between "foreign" and "native" populations. I identify this first area of friction in the adoption or refusal of various liberal citizenship norms, particularly when considering the political regime used in the given nation-state. As such, Chapters 4 and 5 address the relationship between citizenship policy and politics. Are

authoritarian or non-authoritarian regimes more likely to utilize liberal citizenship norms? What

do liberal citizenship norms look like and how do they fit into the history of citizenship, as a

category?

This first "in-or-out" clash is linked to the second area of concern in this: level of

membership. Here the focus goes beyond the basic question of "who can join" to consider how

the mechanisms to gain citizenship differ according to how one's social class. In Chapter 5, I will

discuss how the traditional mechanisms of intrastate inequality have taken on a global tone.

Whether the measured inequality exists between the types of ascriptive rights one has access

due to the country of their birth (Shachar 2009) or due to the economic opportunities afforded

by their country's incorporation into the global economy (Walsh 2011; 2012). What has become

increasingly evident is that not all citizenships are equal. The documents an individual has can

dictate whether they can leave a troubled country, invest in business ventures, or maintain

property in another nation. Similarly, having the "wrong" documents can trap individuals in

precarious regions. As Syrian refugee Mohamed Zaza remarked in a recent podcast interview:

> If you ask anybody on the street, everybody having an American passport, what does it
> mean for you? Nothing! It's just some paper where [sic] you can travel with. For us it's
> life! It's everything! (Higgins 2017)

The final site of conflict that will be taken up in this work deals with the cultural

components involved in determining which groups can be brought into the citizenship fold, and

which are barred from joining. While globalization has forced us to rely on other countries for

raw materials, manufacturing, and commerce, it has also increased the ease with which one can

communicate with others abroad and traverse national boundaries. Economic and political

agreements have attempted to expedite such travels by creating opportunities for individuals

from member countries to enter other member locales without gaining additional documentation, such as a visa (Benhabib 2006; Sassen 1999). Also, members of a given diaspora can gain easier access to their birth countries to visit family and friends, or send remittances to those living with their borders (Brand 2006). The picture developed, at least in these examples, is one where geography is less influential than it once was. People who have moved abroad can keep in contact with those from their birth-nation and keep abreast of political changes and other regional news via the Internet and similar tools. Those abroad are brought together, and remain connected to their birthplaces, via technology.

However, what happens when countries that are heavily integrated into the international economy do not adopt the norms held by many of the countries they are in contact with? Within the context of citizenship, what may influence policy makers in certain countries to hold fast to the ascriptive norms of citizenship, despite the increased use of liberal norms? To address these questions, I will use an in-depth textual analysis of extant national citizenship policies. National legal documents outlining various citizenship policies were gathered via Internet searches and inquiries to the appropriate embassies. Once collected, the laws were coded for the type of citizenship norms being used and who could access them, using qualitative content analysis (QCA), and the countries' political regime type was noted, allowing for a comparison of norm use within authoritarian and non-authoritarian regimes. These findings not only allow me to note the predominance of a specific norm-type, but also to examine some of the reasoning influencing norm adoption. (For a complete discussion of this study's methodology, refer to Chapter 3.)

In the case of the GCC, these countries have adopted similar restrictive policies that consider who can, or more frequently cannot, become a citizen. These adoptions are not only rooted in the cultural differences between the "traditional" sites of citizenship research (Europe and the United States) and the GCC countries, but must also be considered within the holistic scope of economic, political, and historical experiences. It is by using a multifactorial approach that I can avoid the common complaints of Orientalism and the ubiquitous "incommensurability of disparate cultures" arguments (such as in Huntington 1993). The decisions made by policy makers in GCC countries make sense to them, and thereby, researchers must use their sociological imaginations to gain better insight into these motivations (Mills 2000).

However, before embarking on our investigation of how citizenship has fueled global inequality, one must first look at the origins of the status. Chapter 2 provides an overview of how citizenship has developed as a status, but, perhaps, more importantly, the sites of inequality that have typified the status begin to become visible. Expanding on the *republican-liberal* discussion above, this chapter asserts that citizenship is a valuable commodity that has a significant impact on one's life chances. Over time, our definitions of "who is in" and "who is out" have shifted, but modernity has, largely, seen the development of a more inclusive system, based on cosmopolitan and world-citizen norms that value human rights as the main characteristic that all citizenship regimes aspire to.

Chapter 3 turns our attention toward the political regime question of this piece: Do authoritarian regimes rely on ascriptive norms of citizenship? To begin the investigation, the purported link between liberal citizenship norms and democracy will be addressed. Embedded in this examination is an inquiry into a culture's seeming predisposition toward a given political

regime. While recounting Huntington's (1993) controversial work describing the "clash of civilizations" that makes a truly liberal nation-state nearly impossible to form, the results of this study posit that, in support of Said's (2001) and Appadurai's (2006) criticisms of Huntington, there is a mutability within the nature of the state. Further, the human rights regimes that many nation-states employ are signals suggesting human rights transcend beyond national boundaries, with rights extended to non-citizen groups in many areas. Further, one cannot completely disregard social context when discussing policy adoption.

While Soysal (1994), Benhabib (2004), and others have argued for an internationally recognized human rights-based policy for citizens, social and economic class still hold a strong influence on "who can do what." Chapter 4 begins to address this spread of liberal citizenship norms. Within this scope, this chapter focuses on the most fundamental sign of liberal citizenship norms, naturalization. In addition, the rationale behind using the nation-state as an empirical focus in a, seemingly, transnational discussion of rights is addressed within the context of past research. The methodology that allowed this study's qualitative findings is outlined, as well.

Chapter 5 expands the scope of liberal citizenship to examine the increasingly popular processes of dual citizenship and purchasing citizenship. Linking classical Marxism to citizenship policy, I show that countries that receive greater amounts of remittances from foreign-based workers have more lenient travel laws for those seeking work abroad. Further, these policies are extended to the sending of foreign-earned wages home, with streamlined processes of international monetary exchanges taking place formally—local financial institution to home financial institution—and informally—funds being transferred from worker to family, directly.

CIPs allow those with the economic means to gain faster access to passports and other documents from non-birth countries, thereby giving them additional access to the rights of those regions. Importantly, while the ethics of countries having the right to sell citizenships has widely and actively discussed in academia—for example, a European Union Democracy Observatory on Citizenship (EUDO) collection of essays debating the pros and cons of the process (Shachar and Bauböck 2014)—there has been little work to outline which countries have implemented these "pay to play" processes. As part of my examination, a list of all extant countries implementing CIPs has been compiled. Further, I posit that these programs reinforce the inherent inequalities associated with citizenship; pulling it further away from the liberal human rights regimes and emphasizing economic class over humanity.

While the theoretical, and legal, bases of citizenship policies can be traced through the legal documentation discussed throughout this work, what happens when a set of countries dependent on foreign labor strictly enforces the ascriptive forms of citizenship? To address this question, I provide a case study into the citizenship policies of the GCC in Chapter 6. GCC members have effectively exploited their positions as oil-rich nations for their economic benefit. Developing an economic system known as the *rentier state*, governments can profit from allowing foreign businesses access to their lands. These profits are then disseminated to the citizenry. Further, this system relies on the incorporation of large populations of foreign-born guestworkers. However, given this reliance on foreign investment, and the liberal citizenship norms employed by those countries, GCC members elect to rely on ascriptive norms of citizenship—blood and soil. Further, I outline how political elites have effectively wielded

religion, linguistic difference, and fear to not only maintain their autocratic positions, but to severely limit citizenship membership.

The final chapter of this work provides some avenues into where citizenship may be heading. While the human rights based approach to citizenship is compelling, individuals are not fully free of the existing nation-state system. As such, and as the intermediating chapters make clear, the nation-state is alive, well, and influential in our global age. That said, one must also be conscious of the benefits of our individual statuses. As the preceding examples highlight, our opportunities for social protections, and thusly our options for personal improvements, are entwined with the statuses one holds. The rights associated with citizenships are not universal, but vary according to where one's citizenship is from, and if they have access to others. Within this inequity, those who can afford to undertake the necessary steps can, oftentimes, improve their current situation. However, as with other frequently examined sites of inequality (i.e. gender, socioeconomic status, and race & ethnicity), citizenship presupposes our life choices. As illustrated in the Miyati case, one cannot hope to move away from an abusive work situation if there is significant risk in them crossing a national border, or even leaving the site of their abuse. Finally, I close by outlining some spaces for future research, including a regionally based survey examining how GCC citizens view guestworkers and the need for better tracking on who is using CIPs and, thereby, benefitting from the legal fissures in the system.

Chapter 2
State of Acceptance: The Development of the Modern Citizen

The concept of "citizen" is in a state of flux. In the Westphalian tradition, national citizenship had been distinctly tied to one's legal belonging exclusively to a single nation-state (Brand 2006; Linklater 1998). Be the link via ascriptive methods—blood (*jus sanguinis*) or one's location of birth (*jus soli*)—or based on a shared ideology—similar cultural traits, such as religion—formal dichotomies were constructed to delineate who was eligible to receive the rights bestowed on the citizen from the state, and who was excluded. In some cases, the provision of rights was conditional on an individual providing some sort of civic or military service in exchange for this legally protected status (Brubaker 1992). However, citizenship has begun to deviate from this historical basis. As national borders have become increasingly porous, allowing capital and information to cross with relative ease, the scholarship on citizenship has taken on a multifaceted appearance where some see the beginnings of a global system of citizenship based on shared human rights (Soysal 1994; Schierup, Hansen, & Castles 2006), the quantification of individual merit and credentials (Walsh 2011, 2012), or potential economic contribution by potential citizens via remittances from the diaspora or government contributions to the receiving state (Davidson, 2000; Ong 1999; Somers 2010). Despite ideological differences in how citizenship is tied to the nation-state in modern times, these approaches note an increasing fluidity to one's status as a citizen. As such, citizenship is increasingly seen as a mutable status, not one of absolute fixity within this new landscape.

Before discussing how citizenship appears to become less ascriptive and more inclusive, its construction must be examine. As noted in Chapter 1, the nature of citizen has essentially

been a dichotomy: individuals are considered either part of the in-group (us) or part of the out-group (them). Being one of "us" meant that group members could reap the benefits of the state; among which could include access to public services and benefits, in the Marshallian sense, as I discuss in further detail below. Simultaneously, being designated a *citizen* allowed members lawful access to unlimited residence within the nation-state (Brubaker 1992). To be one of "them," in most cases meant the opposite. Being one of "them" limited one's abilities in an area including limits to how long they could stay in the region, where they could go while there, and the requirements they needed to complete to enter or exit the realm (Hampshire 2013).

While a complete history of citizenship and its expansion is beyond the scope of this work, it is still worthwhile to examine some significant developments in the status that were products of their given era and location. The early concept of *the* citizen was developed to identify those deemed worthy of developing and enacting local laws. Referred to as the *republican* form of citizenship, this conception, arose in the ancient Greek city-states, had citizens taking an active role in local politics by holding office, developing laws, and ensuring they were enforced (Ignatieff 1987; Leydet 2014). It is within these law-making processes where citizens separated themselves from subjects. Instead of only being ruled by the decree of a ruler, citizens collaboratively decided what should be made law and how it should be enforced. Further, it is through this community process where laws gained the authority to become binding (Rousseau & Betts 2008).

Given the power tied to the title of citizen, one should not be surprised to learn that it was a status given sparingly. Initially, the status was limited to those who owned property, be

that property classified as land or human, in the case of slavery (Marshall 2006). As such, a fixed

division was created in the *republican* model between those who belonged (citizens) and those

who did not (non-citizens). However, this established division was not conducive to territorial

expansion or colonization (Leydet 2014; Walzer 1989). The Roman Empire developed a new

definition of citizen based in the need for inclusion and pacification. As population numbers

rose, the republican ideal of political participation was no longer feasible; there were too many

people to be able for everyone to hold office during their lifetimes. In addition, an overly

inclusive system could result in politically undesirable outcomes for national elites as the

population of an empire looked increasingly different from its original population. Citizenship,

then, was a way to minimally include and pacify colonized groups.

Instead of the primary characteristics of a citizen revolving around the locally born

property owning class, the Roman Empire expanded it to include elite individuals among

conquered groups. This change allowed for those in newly expanded geographies to be subject

to the law of the ruling empire, while not having a direct impact on its formulation. Further, this

tactic helped create, relative, stability in the Empire by placating local elites (Leydet 2014). The

elites gained the benefit of support from Rome and became Roman citizens, thereby lowering

the likelihoods that they would seek independence from the Empire. They became invested in

maintaining the existing status quo. In this sense, creating a more inclusive citizenry helped

minimize the possibilities of revolution. This more flexible system has become designated as

liberal citizenship and shifted the role of citizen from an "important occasional identity, [to] a

legal status rather than a fact of everyday life" (Walzer 1989:215). Citizenship was now

something that could provide protection for its members in exchange for a few services.

It is this liberal model that formed the basis for our modern conception of citizen. Most modern world governments view citizenship as this "occasional status" (Leydet 2014) where individuals can enjoy the associated rights when convenient, and are encouraged to participate in political realm, instead of taking turns holding political office. As opposed to citizenship being limited by the rigid boundaries of *us* and *them*, citizenship is "potentially inclusive and indefinitely extensible" (Leydet 2014). However, this also meant that an increasingly diverse group of individuals fell under the category of *citizen* in ethnically pluralistic societies; a group that noticed numerous dissimilarities between other citizens, be those differences racial, ethnic, religious, or otherwise in terms. The question, then, is in how to foster group solidarity amid such difference. How can a nebulous and flexible category convince members that they are all fundamentally connected?

Anderson (2006), suggested that diverse groups could be brought together via the symbols exchanged by the citizens themselves. Unified through modern media from print, radio, and television, national citizens are referred to as part of the "imagined community" (Anderson 2006). National communities are formed around symbolic media, despite group members appearing too dissimilar to create unions. Influential group members created stories that inextricably linked their people to their homelands thereby creating a justification for occupying the land. A national system tends to bring different ethnic groups together under the same umbrella by highlighting the naturalness of shared interactions; instead of highlighting difference, similarities and connectedness is illuminated. Such connectedness to the land, and the people within it, gets established using national symbols that were developed and distributed to maintain camaraderie. Smith (1991) notes that these unifying symbols did not

have to take on a written form, but could exist as songs, a flag, shared stories about influential

founders, or other national symbols. Using the United States as an example, such tools of

cohesion exist as "patriotic" items: The Pledge of Allegiance, the national anthem, the legend of

George Washington throwing a silver dollar across the Potomac River, the American flag, and

bald eagle, among others.

Regardless of the type, origin, or appearance of such symbols, the goal is the same:

knowing what the symbols were and what they represented meant that one was with "us,"

while an aversion to the symbols or an allegiance to an alternative set of symbols meant they

were with "them." While the construction of these two groups has been normalized, it was a

necessary stepping stone toward the formation of the modern nation-state (Anderson 2006;

Brubaker 1996; Joppke 2010). With the rise of this new form of unification, group members

could cling to something beyond shared geographic location of residence when talking about

their compatriots. Cultural, ethnic, and ideological characteristics were employed to bring

individuals closer together (Anderson 2006; Smith 1991). Similarly, these characteristics were

the means through which the status was gained. It is toward this status that I now direct our

attention, whether the status be an entitlement or right.

Further, it should be noted that examples from numerous countries will be used

throughout this research. Like the concept of the "imagined community" that sought to unify

populations within national territories, many of the laws surrounding citizenship, naturalization,

dual citizenship, and CIPs have taken on a transnational tone, in that seemingly disparate

countries utilize strikingly similar legal language. While the causal factors of such isomorphism

are beyond the scope of this work, the institutionalization of citizenship, and the characteristics

of who can become a citizen, have become, largely, universal. As such, the examples employed here are representative of other similar nations' laws, and the selected nations are used to illustrate the breadth of existing legal statuses and opportunities.

Shared identities and similarities of cultural constructions set the foundation for two methods used in the ascriptive process of acquiring national citizenship. These methods meant that citizenship was, initially, something that was bestowed upon those individuals who were viewed as belonging. The first method to gain citizenship focused on citizenship via one's bloodline, referred to as the *jus sanguinis* method. Within this method, individuals are granted national citizenship based on the citizenship of their parents. As such, citizenship is viewed as something passed on to future generations. Thereby, if one's father possessed Saudi citizenship, his offspring, too, would gain Saudi citizenship due solely to descent.

Two main characteristics of the nation-state are at play in countries relying solely on the *jus sanguinis* approach. First, it is a method that emphasizes the ethnic membership portion of citizenship (Castles & Davidson 2000). Ethnicity and citizenship are comparable in that they are attributes kept alive through intergenerational transmission. The practices and beliefs (i.e. culture) of the group are taught to future generations via socialization, and are thus maintained in a similar way. Within the *jus sanguinis* approach, the same transmission is visible. The ethnic blueprint of the groups is transmitted from aging generations to younger generations to maintain their belief systems. As noted above, this cultural knowledge is a marker used to determine who belongs and who does not, who is one of "us" versus who is one of "them," and, finally, who is a citizen and who is not. From the *jus sanguinis* perspective, those who can document a blood-link to the culture, and thus the nation-state, qualify for citizenship.

Examples of this approach include the Israeli Law of Return and the German

Kulturnation (Castles & Davidson 2000). In both processes, citizenship is extended to those born

in foreign nations who can trace their ancestry to their respective nations. Those who can

accomplish this task, are free to file for citizenship and gain the rights associated with that

status. The "Law of Return" (Israel 1950) notes:

> 1. Every Jew has the right to come to this country as an oleh.
> 2. (a) Aliyah shall be by oleh's visa.
>   (b) An oleh's visa shall be granted to every Jew who has expressed his desire to
>   settle in Israel…
> 4A. (a) The rights of a Jew under this Law and the rights of an oleh under the
>   Nationality Law…are also vested in a child and grandchild of a Jew, the spouse of
>   a Jew, the spouse of a child of a Jew and the spouse of a grandchild of a Jew,
>   except for a person who has been a Jew and has voluntarily changed his religion…

The German example has its roots in the events of World War II, like the "Law of

Return." Article 116 of the *Basic Law for the Federal Republic of Germany* (Germany 2014)

provides a definition of "German" regarding restoring citizenship. This process is only open to

> Former German citizens who between 30 January 1933 and 8 May 1945 were deprived of
> their citizenship on political, racial or religious grounds, and their descendants, shall on
> application have their citizenship restored. They shall be deemed never to have been
> deprived of their citizenship if they have established their domicile in Germany after 8
> May 1945 and have not expressed a contrary intention. (Germany 2014)

Because of the country's emphasis on the familial transmission of citizenship, Spiro (2008) has

suggested that Germany is the last "stronghold" (18) of *jus sanguinis* based citizenship in

modern Europe, as the nation has made policy distinctions between Turkish guestworkers and

German nationals. By employing the *just sanguinis* method, Germany has effectively shut-off

citizenship to those outside the dominant culture. This action will be discussed in further depth

in Chapters 4 and 5, but a summary of the countries using this method can be found in

Appendix A.

The second fundamental method used to classify citizens was via *jus soli* (complete list also in Appendix A). This method grants citizenship to any child born within a nation-state's borders, regardless of parentage, which suggests that countries using *jus soli* are less concerned with an individual's ethnic heritage, but more concerned with expanding their population, and as a by-product, creating an increasingly cultural diverse society (Brand 2006). As the *jus soli* approach produces a more diverse populous, it is viewed as a, generally, more inclusive citizenship model. Ethnicity is not a deciding factor, only one's geography. In some cases, a modified form of *jus soli* is used to restrict citizenship to children born in the region whose parents have resided there for a given amount of time, thereby minimizing the possibility that individuals temporarily immigrate to an area, or simply visit, to give birth there, thereby guaranteeing citizenship rights to their child. The United States is a commonly used example of this system, as it grants citizenship to any child born within its borders, even to those whose parents are somehow left outside of the legal citizenship system. That said, it is worth remembering that what is at stake in either of the ascriptive methods of inclusion is a status that provides access to certain rights. Rights, to which I direct our attention now.

While these ascriptive types of citizenship outline who can receive the benefits of group membership, they also delineate who can be *excluded* from the system. Therefore, these methods are equally important for the hard boundaries they create (Bosniak 2006). If one is not born to the right parents or in the correct region, they will not gain the benefits of citizenship in the nation-state. Among the costs of exclusion is the loss of civil, political, and social rights (Marshall & Bottomore 1992; Marshall 2006; Reiter 2013). The details of these rights were outlined in Chapter 1, but it is worth recalling that while these rights are taken as a given in

many modern societies, they were initially only available to a select group of individuals—

known as "full citizens"—such as white landowning males (Ignatieff 1987; Marshall 2006).

Ignatieff (1987) suggests that the Aristotelian conception of citizen was based on dependency,

and one must be independent to rule properly. As such,

> Dependent creatures could not be citizens: slaves, those who worked for wages, women and children who were both subject to the authority of the domestic oeconomia were excluded from citizenship. (Ignatieff 1987:402)

The fear was that if someone depended on others for their protection, wage, or survival, their

decisions would be based on maintaining their own wellbeing, not the wellbeing of the group.

Despite the preliminary restrictions associated with citizenship status, as rights systems

developed, the development and expansion of the welfare state could take place. The state was

expected to provide basic support to its citizens. However, it is important to note that while the

full set of these rights were initially limited, as the concept of citizenship became more liberal,

the citizenry grew. Thus, formerly marginalized or excluded groups could now become "full

citizens," themselves.

These basic benefits associated with national membership become confounded as

global connectivity between nation-states increases. With more individuals crossing borders to

seek work in both the historical and modern contexts, the question of "What to do with these

people?" takes center-stage (Hampshire 2013; Joppke 1998, 2010; Sassen 1999; Shachar 2009;

Soysal 1994; Weiner 1995). Further, the receiving nation's treatment of immigrant groups could

come under the scrutiny of other nations who may use such conduct as the basis for future

relationships. For example, if the government had treated immigrant groups poorly in the past,

past trade partners may elect to do business elsewhere, as an informal sanction. With the

intensifying processes of globalization, the strict ascriptive bases of citizenship begin to falter.

Nation-states were forced into a quandary when foreign-born workers want to become citizens

(Joppke 1998; Sassen 1999). Simply denying immigrants inclusion could, potentially, discourage

foreign talent from coming to the country, further limiting the economic prosperity of the

receiving nation (Brand 2006; Hampshire 2013). In short, it is natural to ask: Why should

immigrants travel to regions for work when their path to inclusion is blocked? Given our

increasingly connected world, it appears that the traditional ascriptive methods of inclusion are

no longer adequate to deal with our new realities (Hutchings 1995; Sassen 1999; Soysal 1994).

For many states, the question now becomes one of how to include new foreign-born

individuals, to benefit the nation-state; a question that ascriptive methods of citizenship cannot

answer due to their strict membership requirements. In response to this changing landscape,

nation-states are increasingly adopting more liberal methods of inclusion (see Joppke 2010,

Ong 1999, and Shachar 2009, among numerous other scholars). While the ascriptive bases of

citizenship are still used as the foundation towards group membership, there are now other

opportunities to gain citizenship in non-native countries. The first of these has been through

the general process of naturalization. Broadly speaking, naturalization requires immigrants to

follow a set of state mandated guidelines to attain citizenship status in the receiving country

(Sassen 1999; Spiro 2008). However, there is wide variation in the sets of expectations states

employ during the process. In nearly all cases, a period of residency in the receiving country is

required prior to any required applications be submitted. Further, individuals are often

expected to be in good health, to not have committed any crimes, and speak the dominant

language of the receiving country. Regardless of the compulsory requirements involved in the

process, they all show levels of physical and cultural commitment to the applicant's new country (Joppke 2010; Sassen 1999; Spiro 2008).

Belgium's (2013) recently updated Declaration of Nationality (article 12bis) contains many of the characteristics that other nations have employed to admit new citizens. To gain citizenship, applicants must have "knowledge of at least one of the 3 national languages," and have attained "social integration through a diploma, a training session or a professional experience (5 years' uninterrupted work) or attendance at an officially recognized integration programme…" (Belgium 2013). Further, the length of the applicant's residency can have an impact on their chances at gaining citizenship with those living under 10 years in the country attaining "economic participation through work (minimum 468 days) or through payment of social security contributions (minimum 6 trimesters)" while those living in the country for over 10 years are required to have some "participation to community life" (Belgium 2013). In addition to these specific requirements, candidates are expected to not have any "serious personal facts" which can take the form of committing crimes or being a member of groups seeking to overthrow the national government. Again, while I use Belgium as an example here, all states in this study have similar requirements for those seeking naturalization.

Despite naturalization being painted as an opportunity for anyone to gain citizenship in a new region, other processes have adopted a decidedly class-based tone. Some countries have introduced point-based naturalization processes to "fast track" certain individuals through the citizenship process (Walsh 2011, 2012). Applicants earn points for various benefits they bring to the receiving country. Among these traits are having an advanced degree, a business plan in place that will hire a given number of individuals from the receiving country, or even having

provided a "great service" to the receiving country in the past. While this is a brief list of the potential ways an applicant could gain an advantage over others, what these characteristics indicate is that the naturalization process is not as open as one would suspect.

For example, Canada provides an online calculator for naturalization applicants to find out their score, and thereby their likelihood, to be granted citizenship. The "Comprehensive Ranking System (CRS) Tool: Skilled Immigrants (Express Entry)" (Canada 2017) is designed to help expedite the naturalization process for immigrants from valuable groups. The questions used in the tool include some basic demographic questions, such as the applicant's marital status and whether their spouse or significant other will be moving to Canada with them, and the applicant's age—with younger applicants scoring higher. However, educational level and command of French and English are considered, as well. Those with more advanced professional degrees and higher language assessment scores are more likely to be "fast tracked" than those with a lower ranking degree and average language scores (Canada 2017). From a bureaucratic viewpoint, the point system may make identifying ideal applicants simpler for the government agencies involved, thereby allowing for shorter wait times for valued immigrants. However, it also creates a system where only a select few will prosper (Walsh 2011).

A class based naturalization process can be observed when considering the financial contributions of the applicant. In some cases—e.g. Antigua & Barbuda or Malta—citizenship may be for sale. In these situations, citizenship is offered to potential buyers in similar fashion to other products one can buy. Once purchased, holders of these citizenships can utilize the benefits of each nation-state's citizenship system (Abrahamian 2015; Hidalgo 2015; Joppke 1998; Ong 1999). In many of these

cases, the citizenship statuses offered by the receiving countries provide tax loopholes and

lower local tax rates, thus letting the "financial immigrant" place their money in a different

location than their primary residence. As an added incentive for purchasing citizenship,

applicants oftentimes experience an increased ease of travel due to holding multiple passports

and avoiding lengthy waits for business related visas. Within this system, it is not hard to

envision higher socioeconomic groups gaining significant advantages compared to lower

ranking groups. Citizenships could become social capital, where those who hold more are more

successful (Hidalgo 2015; Ong 1999; Shachar & Bauböck 2014; Webb 2014).

Abrahamian (2015) outlined an interesting case in which the UAE government sought to

remove various non-national groups—labeled *bidoon*—from the country by purchasing

Comorian citizenship for them. While related to the CIPs, examined in more detail in Chapter 5,

this "pay to play" method of citizenship provided an outlet for Dubai. While purchasing

Comorian citizenship for thousands of non-nationals was expensive up-front, the plan was

viewed as an acceptable alternative to integrating the *bidoon* into the dominant Emirati culture.

Not only, would Dubai export "foreign" cultural groups, Comoros could financially benefit from

the deal. Ultimately, rough estimates suggest that somewhere between 60,000 and 100,000

Comorian passports were printed and sold, (supposedly) netting the government approximately

360 million dollars (Abrahamian 2015). However, the Comorian government states that it did

not receive close to that amount of money, and International Monetary Fund inquiries have

supported their claims (Abrahamian 2015).

The previous two examples of purchasing citizenship add to the suggestion that

citizenship and class go together. Most notably, in the example of "financial immigrants" and

CIPs, those who can afford additional statuses can free themselves from the limitations of their birth status. As will be noted further in Chapter 5, members of higher socioeconomic classes can limit the impacts of a weak set of rights; they can increase the ease of moving—both physical and of business interests—by buying the opportunities that competitors may not have. Further, when addressing the *bidoon* "problem" in Dubai, political elites negotiated the move of tens-of-thousands of stateless individuals, many of whom were born within their borders. Those in positions of power could dictate the life outcomes of legally unprotected individuals by moving them somewhere else, and in this case, somewhere that many *bidoon* had never seen. From a class perspective, not only does one see the values of legal protection in citizenship here, but there is an added benefit to being in a higher-ranking status as one can, potentially, dictate with whom one shares space. From a Marxist perspective, if the stateless person is doing a job that cannot directly benefit the elites—whether in business, physical labor, or service—, they are not contributing to the economic system, and can be targeted for deportation. In this case, socioeconomic status gave one control over their living space and future.

The third example of the liberalizing citizenship process can be seen when considering a country's diaspora. In this case, one sees the ongoing relationship that immigrants maintain with their initial countries; it is essential to remember that immigrants remain in contact with their families "at home" and, many times, have a significant interest in the region's events (Brand 2006; Davidson 2000). Along with such concern, many immigrants send remittances to families in the sending country. Such connections—both monetary and familial—are simplified by offering unique citizenships to those in the diaspora. Doing so not only eases travel, but can

also foster greater concern with local events. In India's case, holding a certain level of diasporic

citizenship allows the individual to hold property while simultaneously offering increased rights

to their foreign spouse and any foreign-born offspring (Aneesh 2015).

In an effort to appeal to members of the diaspora, the Irish Naturalisation and

Immigration Service has provided a statement to encourage a new state-of-being, "Irish citizens

may also be citizens of another country" (Ireland 2017). Referred to as dual or multiple

citizenships, these situations shed light on the bureaucratic issues that can arise with classifying

individuals. For example, Spiro (2008) notes an increasingly common situation where children

could be born into multiple citizenships depending on their parentage and their birth locale. His

example notes that a child of an Italian immigrant in the United States could be born with

citizenship in both countries, due to their prevailing ascriptive laws: Italy's system is based on

blood, while the United States employs a system that gives citizens to children born within its

borders. As such, this child poses a bureaucratic conundrum for the Italian and American

governments. Ireland's statement on dual citizenship also accounts for this situation, as Irish

nationality is transmitted via *jus sanguinis* and not guaranteed to everyone born within the

national borders (Ireland 2004). As discussed further in Chapter 5, Italy and Ireland are part of a

growing number of countries offering a set of options to citizens living abroad.

What one sees across all three of these liberalized approaches to inclusion is a

weakening of the state's hard boundaries of exclusion, inherent in ascriptive approaches to

citizenship (Bosniak 2006). Within these weakening ideological borders citizenship regimes are

becoming more open to the non-citizen, allowing different groups from distant regions to

access the mechanisms to become a citizen. However, this discussion is very different than one

of a "weak state versus strong state" discussion. I do not mean to imply that the state apparatuses of each nation are withering, but instead the hard exclusivity of citizenship—a status initially defined by the state with the intent to keep "others" out—has begun to weaken. As such, the state still plays an essential role in the creation of law and that the guarantee of rights is provided to citizen-like members. Within this scope, the state is still a significant and strong actor. However, it is still worth asking, as others have done (for example Habermas 1998, Sassen 2006, and Somers 2010, among others): what *is* the state's role in this changing world? In the following paragraphs, I will briefly introduce two conflicting stances on the condition of the state's participation in citizenship rights, and outline a mediating approach seeking to reconcile them.

The first proposition is that the state is becoming outdated because of the globalization process. Simultaneously, it is losing power to enforce its sovereignty, and is, thus, in decline as an institution (Habermas 1998; Isin 2000; Moeller 2008). More specifically, national policy decisions are considered within its regional ecology. What other countries are doing matters as those decisions influence how political decisions are made in nearby countries (Isin 2000; Sassen 1998; Somers 2000). Coinciding with the increased rates of transnational economic transactions, communication, and travel, is the call for a universal concept of human rights (Bosniak 2006; Soysal 1994; Turner 2000). This shifting definition of rights expands on Marshall's basic state-based typology by seeking to suggest that all humans inherently have a "right to education" and "right to freedom," among others. The United Nations' (UN) Universal Declaration of Human Rights has already provided a basis for the move towards a universal rights regime (Benhabib 2005; United Nations 1948). One potential benefit of a push for

universal rights is that "at risk" groups, such as refugees and others seeking asylum from

violence, will be protected while simultaneously providing protection for foreign workers

(Benhabib 2004; Brand 2006; Somers 2010). Ideally, a universal rights system would negate the

needs for different citizens' rights regimes; providing a uniform system of guidelines that all

nations would follow.

Despite the appeal of this cosmopolitan approach to citizenship (Appiah 2006), it begs

the question, "Who is responsible for providing these rights" (Benhabib 2005; Somers 2010).

Here, the state's role designating who gets rights is mediated by intergovernmental

organizations (IGOs) or international non-governmental organizations (INGOs). As previously

mentioned, the UN has proposed a blueprint for how nation-less citizenship should look, but

the organization lacks the authority to enforce any real policy. Thus, reaffirming that the

nation-state is still required and influential. Humanity is living in an era where transnational

norms are taking hold, but is still expecting the nation-state to enforce these norms.

Within this line of thinking, nation-states are becoming stronger, in the sense that they

are creating citizenship norms, while designating who can gain the rights accompanying the

status (Blau & Meyer 1971; Isin 2000; Shachar 2009). Further, these memberships may be

increasingly important to individuals, as they are a method to form personal identity and show

loyalty (Isin 2000; Ong 1999). Group identity is important from an organizational standpoint as

well since it helps the state identify who should receive rights-based benefits. Further, a visibly

strong group identity creates a convincing case to policy makers that they should be a

legitimate recipient of rights (Bosniak 2006). Ultimately, the burden of recognizing and

enforcing compliance to citizenship rights and the provision of benefits falls on the shoulders of the nation-state, further reinforcing the claim that the state remains central to the discussion.

As an extension of the ongoing strength of the state, Saskia Sassen's work can provide insight into how state apparatuses can develop to influence, and drive transnational organization behavior. Sassen (1998, 1999, 2006) posits that world scripts and transnational norms, now increasingly common across national boundaries, have their origins in the history of various regions. As such, our modern, global institutions and norms originated as entities within the national apparatus. Initially, the nationalizing process begins as local actors—e.g. rulers or ministries—enact various policies or rules using a given type of language. Over time, more large-scale ruling bodies, such as the state, transfer the local policies and actors to the national level. What were once local rulers and rules become national cabinet officials and federal laws. Finally, national policies are brought to the transnational stage when they are adopted by IGOs and INGOs (Sassen 2006).

In short, the scope of a modern policy's influence can become transnational, but the origins of the idea can be traced to earlier local forms of social interaction. This process of policy dispersion directly benefits from increased rates of globalization. While nations are becoming increasingly dependent on international trade and their citizens and capital are traversing international borders, the citizenship and rights processes researchers observe are being incorporated onto the transnational stage. Similarly, trade agreements between nations are built on the assumption that the involved countries share similar economic systems. Barriers to the import or export of goods are reduced to increase the flow of products between

the nations. Further, the flow of capital to fund these expenditures increases to maintain a

positive business environment (Sassen 2006).

Now that the historical and theoretical bases of citizenship have been laid out, what

does this ideological shift look like in the "real world?" While my examination is based on

authoritarian and non-authoritarian political regimes, it is worth remembering that neither

category is uniformly pro-ascriptive methods or pro-liberal methods. Instead, each nation-state

holds sway over its own policies. Chapter 3 will begin to address this disparity in liberal

citizenship norm adoption by discussing how the countries used in this study were classified

along political lines. In addition, the methodological process of data gathering and analysis will

be outlined. Lastly, the indicators of liberal norms—naturalization, dual citizenship, and CIPs—

are defined as their links to the existing state apparatus are identified.

Chapter 3
Implied Incommensurability

While the previous chapter outlined the historical bases for citizenship and described the norm regimes used by the world's nation-states and the areas scholars, this chapter provides some context into why the nation-state has remained the focus of citizenship research, despite the push towards liberal citizenship norms. Further, I provide a contextual elaboration of the central research problem: do authoritarian and non-authoritarian nations employ inherently different citizenship norms. I start with a brief examination of three influential, modern studies of citizenship that illustrate the loosening of the ties between the nation-state and the citizens who inhabit it. From this discussion, the focus of these studies, liberal citizenship as practiced in the west, becomes clear and provides intellectual space for this work's case study of the GCC. As part of this elucidation, Huntington's (1993) argument that disparate cultures are destined to remain in contention is addressed in light of inclusive, liberal, humans-rights based citizenship plans. Lastly, the methodology used in this study to address the research problem. The process of collecting and coding the numerous national legal documents allowed me to explore how closely citizenship is linked with political regime—authoritarian and non-authoritarian. While one would expect to find that non-authoritarian regimes employ liberal norms and authoritarian regimes rely on ascriptive processes, as one recent publication (Mirilovic 2015) suggests, I find that there is significant variation within each category.

The Liberal Horizon

Soysal's (1994), Shachar's (2009), and Bosniak's (2006, 2009) works have been influential in their analysis of human-rights based citizenship norms. Whether those norms be centered around the inherent humanness of us all in accordance with the world society scripts of human rights (Soysal 1994), the inequality connected to the location of birth (Shachar 2009), or in the nation-state's continued role of choosing who is eligible for rights (Bosniak 2009), each work has built upon the contributions of the prior. However, the strict focus on the West as the exemplar of citizenship rights and affordances limits our assessments. In what follows, I will provide brief summaries of each work, their relationships with one another, but also how they have led to the formation of this research project.

Soysal (1994), provides a valuable analysis of liberal citizenship norms by suggesting that postnational citizenship in Europe increasingly derives its legitimacy from world level models of human rights, allowing guestworker populations to enjoy many rights that were earlier available only to European citizens. Within her formulation, membership in the dominant culture is not a necessary component of group membership, but one's status as a human actor warrants access to basic rights. What this means is that guestworkers and other non-nationals would gain access to sets of rights in the country they are working and living in, simply because they are human, not based on gaining citizenship in that locale. Substantively, the postnational system would guarantee guestworkers and other non-citizen groups "…the right and duty of participation in the authority structures and public life of a polity, regardless of their historical or cultural ties to that community" (Soysal 1994:3). As such, citizens' rights become a transnational issue as individuals' rights would not only come with them when they cross

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national borders, but the rights regimes in place would be similar regardless of the border one crosses. In essence guestworkers and other non-nationals would be provided a political voice in the country where they already making significant economic contributions.

In contrast to Soysal, Shachar (2009) argues that citizenship is still tied to place and person, despite the spread of liberal citizenship norms. Currently, one gains citizenship via the blood-and-soil mechanisms discussed previously, leading to situations of inequality based on one's place of birth. All citizenships are not equal. An individual born in a rich country inherits, like property, rather than earn, political and economic benefits. For example, French citizenship automatically guarantees the holder unimpeded travel to other European Union member-states, an opportunity that is not extended to those born in China. Further, citizenship can also provide entitlements, solely based on holding the status; such situations are outlined within the context of the GCC in Chapter 6. To remedy these inherent inequalities, Shachar suggests two potential solutions. First, that those holding citizenship in a richer country pay a sort of inheritance tax on their citizenship status; the balance, of which, is then transferred to poorer nations. Her second solution is that nations lessen the restrictions tied to immigration. Lowering these barriers will allow those from poor countries to gain access to richer nations, thereby also gaining access to the larger sets of rights (Aneesh & Wolover 2017; Shachar 2009).

A second site of contention with Soysal's postnational plan comes from the ongoing role of the state in rights coverage. Bosniak (2006, 2009) contends that citizenship not only identifies who can or cannot receive rights, but also how one's status can be linked to their place in society. Within these situations, the state values those considered citizens more than non-citizens, and provides rights to the "deserving" group. As such, the nation-state acts as the

guarantor of rights, and as Bourdieu (2014) notes, a "citizen is a person who is recognized as such by the constitution, and there is nothing more to say about him" (p.351). Further, the state's role is to ensure that every national citizen has access to the same rights as any other national citizen. In this way, rights are equally distributed among the "deserving," while the "undeserving" do not have access to the same entitlements.

Within this context of the "haves" and "have nots," the state provides a second function, that of a firm barrier demarking where the guarantee of rights end (Bosniak 2006). The borders of each state are not only signs of political sovereignty, but also act as the edges of the citizens' basket of rights. Once a citizen traverses the border, they cannot be guaranteed the same protections since they are, now, within another state's domain. However, reverse course back to their nation of origin, and the citizen can enjoy the same rights as their compatriots.

Despite philosophical differences between Soysal's (1994) postnational citizenship, Shachar's (2009) conception of citizenship as the prize from a "birthright lottery" everyone plays at birth, and Bosniak's (2006:4) "hard on the outside and soft on the inside" understanding of citizenship as something guaranteed and limited by the state, there are two significant similarities among their works. The first is geographic. All three of these researchers focused their empirical lenses on how citizenship functioned and changed within Western cultures. Both Soysal and Shachar examined the experiences of the broad swath of the West in considering both US citizenship and, by extension, its European roots. Soysal turned her focus to the experiences of migrants and guestworkers on the European continent. Further, her conclusions are based within the seeming "naturalness" of migration in the region. History is

filled with examples of groups crossing boundaries for not only the economic benefits that garner much of current literature's focus, but also as part of religious pilgrimage and the spreading of those beliefs (Soysal 1994). What this created was a situation where the peculiarities of citizenship were also examined within the context of a specific governmental body: non-authoritarianism's liberal norms. How I define a liberal regime in this study—versus a non-liberal or authoritarian one—is outlined in further detail in what follows, but, in general, these regimes are characterized by their adherence to the democratic political goal of participation, and citizens have a degree of freedom of speech, etc. In short, Marshall's (2006; Marshall & Bottomore 1992) triumvirate of rights can be observed in liberal regimes.

Governmental type is also tied to a second similarity between these influential studies: their empirical focus. All three of these works find the nation-state as important actors. For Soysal, the inequalities in opportunities she observed between European citizens and migrant populations were enforced by state-level policies. Shachar contends that the differences in rights groups possess are based on our national memberships; the nation-state one is born into is the one that dictates our chances. Finally, Bosniak, too, identifies the nation-state, not only, as the body granting rights to its citizens, but also in determining who can be a citizen.

This empirical emphasis on the liberal European experience brings us back to the primary research question of this work: are there differences between the citizenship norms employed by liberal and authoritarian regimes? Is there something about liberal regimes that cause them to employ the more inclusive, non-ascriptive forms of citizenship? Further, is there something about the authoritarian systems that are "predisposed" to adopting a more restrictive view of membership?

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While Chapters 4 and 5 provide a geography of the current citizenship landscape,

Chapter 6, a case study of the GCC, provides a closer look at the final research question above.

The case of the GCC is an exemplar of the complexities associated with citizenship regimes.

Politically, the GCC countries are classified as authoritarian, yet they are heavily integrated into

the world economy. Their national economies are dependent on their trade relationships with

numerous other countries, including many non-authoritarian states. What this implies is that

the leaders of GCC countries have been exposed to the norms that their non-authoritarian

trade partners employ, but have actively decided to adhere to ascriptive forms of citizenship.

The bases for these decisions will be discussed at greater length later, but it is important to take

note of variation.

Generally, while the liberal forms of citizenship emphasize a universality of rights that

transcends locale and nationality, the ascriptive forms of citizenship highlight difference and

exclusivity. Such "out-group" fear or skepticism has formed the foundation of a "clash of

cultures" argument that suggests an inherent incompatibility between groups. Instead of

countries practicing liberal citizenship norms becoming pluralistic nations where difference is

embraced, these countries are somehow doomed to endure conflict as the result of numerous

cultures seeking to become dominant. Huntington (1993) suggested that these observable

differences between cultures would be the fuel of future international conflict, and, ultimately,

inhibit any out-group unity. Our differences in history, language, identity, religion, and cultural

items would cause groups to cling tightly to the main pieces of their identity, while

simultaneously pushing away individuals who did not hold those views; thereby making

postnational citizenship and inclusive nations impossible.

However, Huntington's assertions have been met with widespread criticism. First, he treats civilizations as a primordial source of identity. While it is true, as he notes, that civilizations are large-scale collections of people with similar cultural practices and long-held beliefs. Writing his piece in 1993, Huntington did not have the benefit of seeing the direct effect of "everyday" information and communication technologies (ICTs). The daily life of a citizen has changed drastically in the almost 25 years since his publication. The dependence of much of the world's population on the internet's information trove, and the ICTs used to connect us to it, have been effective at increasing our exposure to foreign cultural practices and beliefs. However, I do not suggest that McLuhan's (2003) hope for a *global village* constructed from our use of communication media has materialized, thereby eliminating any-and-all misconceptions, but these tools are much more accessible than ever before. Further, such availability does not equal accessibility since one still needs to be able to afford the technological tools and speak the dominant online language. Also, I do not discount the impact of cultural identity, and the perception of difference between groups. One only need look to numerous genocide and ethnic cleansing events in recent history to gauge identity's importance. However, contrary to Huntington's argument, seemingly primordial clashes many times occur within civilizations rather than between them (Appadurai 2006). For example, the long-running war between Iran and Iraq was between the conflicting viewpoints between Sunni and Shia tenets of Islam, not a battle of Western and Eastern civilizations.

Similar intra-ideological rifts also exist when considering liberal regimes' differing uses of citizenship norms. While these countries espouse the values of democratic systems—open elections, free speech, etc.—there is a distinct turn away from the inclusive nature of pure

democracies; some groups may be kept out of the political system, barred from receiving

specific sets of rights, or not allowed access to the processes of naturalization (Zakaria 1997).

One previously mentioned example can be found in the case of Germany. Naturalization, and

thereby access to citizenship, is open to a small number of ethnically bound applicants, but the

government functions as a liberal democracy and holds open elections.

Japan's extant citizenship policies also follow this semi-liberal trend. Citizenship by birth

is gained solely through the *jus sanguinis* method, where the parents' status is passed onto any

children, regardless of the location of birth (Japan 2017). The legal importance of familial

lineage is further highlighted when discussing foreign-born children who have been adopted by

Japanese parents. Adoption does not grant the child immediate citizenship, but they must apply

for naturalization upon turning twenty years old. The basic requirements for the adoptee are

the same as for any other applicant, in that they are of "upright conduct," have a reliable means

of income, and have not "plotted or advocated…the overthrow of the Constitution of Japan or

the Government" (Japan 2017). However, an adoptee is only required to have "domiciled" in

Japan for three consecutive years prior to their application, compared to a minimum of five

years for other applicants. This adoptee requirement is also transferred to non-national

spouses of Japanese citizens, thereby making their paths to citizenship a bit shorter than

general applicants.

Despite Japanese citizenship being open to most individuals, currently there is a distinct

turn away from the liberal norm of dual citizenship. As one of the final requirements towards

naturalization, an applicant must renounce any other citizenships they possess. Similarly,

Japanese nationals who obtain citizenship in another country immediately lose their status as

part of the naturalization process. As such, dual citizenship cannot be a (legal) reality for Japanese citizens, at this point. Nationality and citizenship remain directly tied to the sole nation-state, in this case, thereby eschewing the liberal norms of citizenship discussed in Chapter 2 and outlined in more detail in Chapters 4 and 5. Substantively, this means that despite Japan's status as a liberal political regime (*The Economist* 2016), it has maintained relatively restrictive citizenship policies surrounding who can join the nation, and what they must do to become a member of the state.

The second main problem with Huntington's conclusion relates to his treatment of religion as the factor determining whether or not civilizations clash. Instead, and as will be discussed in further detail in future chapters, race and economic concerns are equally important for citizenship policymakers. Further, Huntington's "East versus West" conception of the clash of civilization paints a picture where countries are cursed to engage in conflict, not flourish via economic trade or the exchange of ideas. Similarly, in a criticism of Huntington's claims, Edward Said (2001) highlighted Huntington's misconception of civilizations as:

> …shut-down, sealed-off entities that have been purged of the myriad currents and countercurrents that animate human history, and that over centuries have made it possible for that history not only to contain wars of religion and imperial conquest but also to be one of exchange, cross-fertilization and sharing. (p.12)

Instead, one needs to consider culture, and humanity, as a porous entity affected by a variety of factors, not only the economic, but also one influenced by increased communication, increasing ease of international travel, and the ability for workers to find jobs outside of their country of origin. As such, while Huntington's clash of civilizations argument is in many ways flawed (see Said 2001 for an excellent discussion), it still employs the intuitive measure that many individuals use to evaluate their interactions with others. As noted previously, the parsing of

individuals into "us" or "them" can be used as a determination as to who is guaranteed access; who can become a citizen, and who cannot (Hampshire 2013).

However, prior to further analysis, it would be expedient to discuss the methods used in this study. The next section will lay out how this study's dataset was created, how the various legal documents pertaining to national citizenship laws were analyzed, and address how the categories of "authoritarian" and "non-authoritarian" political regimes were constructed.

Classification and Coding

To adequately address this study's first concern of what kind of political regime employs which citizenship policies, a comprehensive list of countries was compiled. This task was expedited by utilizing the International Organization for Standardization's (ISO) list of country codes. For this study's purposes, ISO 3166—the International Standard for country codes and codes for their subdivisions (ISO 2014)—was referenced, as it is a current list of countries and is frequently utilized by numerous organizations focusing on transnational issues. Ultimately, these codes provided a sense of uniformity in an international context as the names of countries frequently change depending on the language used (ISO 2014).

After compiling the list, the necessary documentation to address the research questions was collected. These documents were compiled from a variety of sources, including government websites of relevant departments, ministries, embassies, and consulates. In cases of ambiguity, the embassies and consulates for the country in question was contacted for clarification. In addition to the appropriate legal documentation, other demographic data was gathered. General population figures and information regarding the official language, religion, and dominant ethnic group was collected via the 2013-2014 CIA World Factbook (Central

Intelligence Agency 2013). Such documentation also provided the necessary information to determine the naturalization policies in place for each country.

The *Democracy Index 2015* (*The Economist* 2016)—published by *The Economist* magazine's Intelligence Unit—was used to ascertain the liberal or non-liberal character of a political regime. The *Democracy Index* is an attempt to unify the discussions surrounding how a democracy is defined. As the publication notes, "Although the terms of freedom and democracy are often used interchangeably, the two are not synonymous" (*The Economist* 2016:42). This brief quote notes a primary issue with studying political regimes, particularly democracy, one can identify what they consider to be a democratic system, but how do researchers apply these generalizations on an international stage? What characteristics do all democracies possess? Finally, to address the relationship between freedom and democracy, the *Democracy Index* considers "electoral process and pluralism; civil liberties; the functioning of government; political participation; and political culture" (*The Economist* 2016:44). While there may be skepticism over utilizing a mass publication's measurement system, Alexander & Welzel's (2011) analysis of commonly available democracy measures suggests that *The Economist's* measure displays "very strong correlations with empowering social contexts" (p.283-284). This conclusion holds true across all contexts used in their study, with the *Democracy Index* scoring in the top three of assessed indices which included economic freedoms, wealth distributions, and levels of civic engagement.

The *Democracy Index* uses ratings for 60 indicators spanning five categories, with a final scaled score between zero and ten being tallied. From this scale, four types of regimes are identified with full democracies scoring between 8 and 10 on the scale, flawed democracies

receiving scores between 6-7.9, hybrid regimes scoring 4-5.9, and authoritarian regimes scoring

below 4 (*The Economist* 2016). Full democracies hold characteristics including a political

culture—supported by a "flourishing" (*The Economist* 2016:45) democracy—where civil

liberties are respected, government functions satisfactorily, media maintain a diverse and

independent existence, systems of checks and balances are effective, and the judiciary is

independent and their decisions are enforced (*The Economist* 2016). At the other end of the

spectrum, authoritarian regimes exhibit characteristics against political pluralism—with many

countries practicing outright dictatorships—characteristics of democracy may exist but may be

figureheads, elections are not free, civil rights are impinged upon, and the media is typically

state-owned or controlled by those who are associated with the ruling regime (The Economist

2016). To create a binary for this study, I compared the citizenship and naturalization processes

of authoritarian regimes to those of generally non-authoritarian regimes, which is a

combination of the remaining three categories. This step sought to group all of countries with

some modicum of democratic characteristics present, while delineating from those countries

where no democratic characteristics flourish.

Two final sources were used to understand the potential reasons why a country may

wish to consider allowing formal dual citizenship status or not. First, to provide a perspective on

the diaspora that could be affected by citizenship law changes, information regarding the

approximate diaspora population for the countries in the study was gathered via the

Organisation for Economic Cooperation and Development's (OECD) (OECD 2012). The OECD's

research provided information outlining the size of each member country's diaspora. In other

words, it created a picture as to how many former nationals of a country were now living abroad.

Information in respect to the countries' foreign direct investment (FDI) was obtained via The Heritage Foundation's *2014 Index of Economic Freedom* (Heritage Foundation 2014). This data is important to this study, as it can be an indicator of a country's stature in the global economy. As such, a country with a higher FDI may institute more liberal naturalization policies in the interest of expanding its citizenship base to increase direct investment. Further, a national economy that is more active in the international arena could lead to increased remittances from the diaspora. In contrast, regimes interested in insulating a region from global trade could move to restrict its citizenship requirements.

Both the size of a country's diaspora and its FDI can help lend insight into how willing a country is to adopting liberal citizenship policies. First, if a nation is seeing large amounts of money coming into the country, whether via personal remittances or foreign investment, it would be in their best economic interest to ensure that the policies facilitate the inflow of remittances (Aneesh 2015; Brand 2006). The faster the funds reach their recipient, the quicker it can be injected into the local economy in the form of personal purchases or business investments. Second, having a large diasporic population could encourage policy makers to ease travel requirements for former nationals returning to their birth-nation to visit family, and, in some cases, allow for those residing abroad to maintain their participation in national politics (Brubaker 2006). For example, in the case of India, the status of an Overseas Citizenship of India (OCI) was developed to allow former nationals to gain "…the right to buy and sell property and the ability to enter and leave India without a visa, but no political rights." (Aneesh 2015:14). As

such, the status voids an emigrant's political rights, but provides a legal advantage to access

that is closed off from other travelers to the country.

Lastly, information regarding citizenship by investment was collected. Data collection for

this research arena followed the same process as the previously discussed areas. However, in

the case of investment based citizenship, much of the data was not housed in official sources,

but discussed on the websites of firms specializing in attaining these statuses for their clients.

As such, this examination sheds light into the business of citizenship, along with the changing

definitions and expectations for the status.

Following the collection of each country's citizenship laws and basic demographic

information, the legal documents were coded using QCA. This method allows for easy

categorization of information while maintaining concise coding categories. While a quantitative

approach to my research question would be useful in assessing how similar countries

employing dual citizenship laws are to one another, researchers lose the general context of

each case. Assuredly there is some similarities between countries' laws, however, a question

remains in explaining countries that do not align with the regional trends? Here, QCA allows for

an investigation into regional variation and provides space to question, "why is there

difference?" while providing the context of such difference.

Holsti (1969) has outlined an effective strategy where inference can be made "on the

appearance or nonappearance of attributes in messages" (p.10). Within this framework,

researchers can assess the effectiveness of a given language pattern (Weare and Lin 2000). This

thought process was utilized in two distinct areas of this project. First, recurring themes in how

citizenship statuses are labeled can be identified. Second, the types of rights and opportunities

for differing statuses were evaluated and compared to those of other nations to determine whether a weaker form of citizenship—such as dual citizenship and naturalization—is present. Qualitative research allows us to identify this gap between policy and practice. Further, such insight could help explain the situations of countries without documented dual citizenship policies, but having informal expectations or requirements.

Following the identification of the *in vivo* codes—or "literal terms" of investigation (Berg 2004:271)—present in the legal documentation and media accounts, the documents were processed via open coding. During this process, researchers ask a specific set of questions of every document. These questions are meant to probe deeper into the source material and will center around how was citizenship gained—*jus sanguinis, jus soli*, or some combination—, is there any mention of dual citizenship, and are individuals who gain this status afforded different rights than those holding sole citizenship in a region? Further, who can or cannot apply for citizenship?

A second intensive wave of coding was then begun. During this undertaking, it was essential for me to frequently note potentially important theoretical points derived from the texts. Each document was evaluated for the presence or absence of a specific theme or characteristic. By providing a more in-depth look at these topics, one can begin to look for patterns present in the legal documents. [For a complete list of codes employed in this research, see Appendix B]

To aid in coding, *Dedoose* qualitative analysis software was utilized. This cloud-based tool allows for a single database to be created where coders can upload general data about the countries in the study, but also link legal documentation and other appropriate media content

to each entry. Once the documentation is linked in the database, coders can apply specific research codes to each item. Coding within the system allows for easy analysis of each document, as each code was shown as a specific color. Further, this visualization helps ensure accuracy as others could verify the codes and disagreements surrounding how a passage was coded were addressed. Finally, the software eases the process of data analysis by allowing for the quick coding of texts, compilation and visualization of data.

Variation as the Norm

During the process of coding I identified three main arcs of adoption, which I will, briefly, describe here and will form the foundation of the next two chapters' discussions. At the foundational level, I coded each country's legal documents to assess their naturalization policies. As noted in the previous chapter, naturalization was one of the central elements countries implemented to overcome the limitations imposed by the exclusivity of ascriptive norms of citizenship. Naturalization offers immigrant groups access to the citizenship process, and in turn its political and economic systems. Completing the process allowed for a complete personal realignment: leaving one's birthplace behind while adopting a new homeland. Naturalization assumes that an individual is not solely bound to their birth citizenship, but can, instead, decide to move abroad. As such, it challenges the assumption of citizenship's permanence through the accident of birth. One is not only their birth nationality, status, or identity, but they are also free to seek out other locales. At the same time, this thinking begins to show the permeability of the national boundary. Instead of the border of the nation-state being an impenetrable barrier to keep the *others* out and ensure its citizens'—those within the

boundary lines—rights, the border softens into a fluid region where individual statuses become

blurred (Bauböck 2009; Janoski 1998).

The second sign of a nation's push toward liberal citizenship policies is the acceptance of

citizens gaining more than one citizenship. Within the scope of this work, I measured this level

of liberal citizenship policy adoption by identifying countries that allow their citizens to gain

dual, or multiple, citizenship or actively denounce the practice. In short, dual citizenship is a

situation where an individual holds legal citizenship in two or more countries, and as such has

access to, at least, two distinct sets of rights. In the common literature (Sejersen 2008), dual

citizenship is often considered the product of a conscious decision by a rational adult who

chooses to acquire a second citizenship, regardless of their individual motivations. However, as

noted in the previous chapter's hypothetical case of the child of an Italian immigrant who is

born in the United States, one can, literally, be born into an ambiguous status due to regional

interpretations of who is a citizen (Spiro 2008). While this issue may be more prevalent in

countries relying on the *jus soli* principle of citizenship (Brubaker 1992), it also highlights the

imprecise nature of dual citizenship. This coding category was not only restricted to the

"accepting" and "denying" categories, but also included nations who did not author formal

policy. In these cases, I examined popular accounts of those trapped in this hazy status.

Essentially, what were these individuals supposed to do? Were they expected to formally

request citizenship from one country while denouncing the citizenship from the other?

Finally, the broadest arc of my research falls into a relatively new and malleable

conception of citizenship where individuals purchase citizenships on a, virtually, open market.

Commonly referred to as CIPs, flexible citizenship (Ong 1999), or the "golden passport" (see an

edition of special working papers edited by Shachar & Bauböck 2014 examining the ethics

surrounding such sales), wealthy individuals purchase passports from foreign nations for a

variety of reasons including easing their own travel between nations (Ong 1999; Shachar 2014;

Spiro 2014), knocking down barriers to international trade (Bauböck 2014; Dzankic 2014), or

removing guestworkers and other non-nationals from the country (Abrahamian 2015).

Regardless of the reason, this opportunity pushes beyond the issues surrounding dual

citizenship. Now, instead of dealing with individual ties to two nations, those with access to

capital can gain rights in handfuls of countries. As will be discussed in more detail in Chapter 5,

this poses a significant issue for the nation-state, given the skepticism many have towards

dual/multiple citizenship holders: where do their allegiances *really* lie (Brand 2006; Davidson

2000; Sassen 1999; Somers 2010; Spiro 2008)?

However, it is worth noting now that this conception of citizenship, where one's

economic status can direct their national allegiance(s), adds to the previously discussed topic:

the rise of the human rights regime. One the one hand, holders of multiple citizenships are

exemplars of the rise of the universality of human rights. As such, countries accepting this

status, thereby embracing these individuals and the multiplicity of statuses they embody, are

exhibiting the most fluid state of citizenship; a citizenship that is free to move across borders

and flexible enough to adapt to its current state. As Aneesh (2015) noted, these cosmopolites,

to borrow Abrahamian's (2015) designation, hold a basket of rights that expands or contracts

depending on where they are and what they are doing in their present location. However, one

should not assume that just because that human rights based systems has been employed that

the nation-states are somehow in decline. Instead, I posit, as others have (Brand 2006; Dower

2005; Isin 2000; Joppke 2010; Linklater 1998; Sassen 1998), that the state is still a necessary

component of the transformation of citizenship. It is the source for granting or denying rights,

while also maintaining the structures necessary to promote group membership. Further, as the

next two chapters note, the state is the institution responsible for enacting or discarding the

scripts associated with liberal citizenship norms.

Chapter 4
Ambiguity of Belonging: Political Regimes and the Deserving Few

In the previous chapter, I briefly outlined the research processes used in this study, including how countries were included or excluded from the number evaluated, the criteria used to designate a state's political category, and elucidated the three interrelated markers of liberal citizenship norms I have used in my analysis: naturalization, dual citizenship adoption, and CIPs—also known as "golden passport" programs. What each of these markers suggest, is that the scholarly literature examining citizenship has begun to identify ways in which the norms of belonging are becoming more flexible. Instead of the nation-state holding a dictatorial hold over the opportunities of individuals. Individuals, instead, can seek to gain rights elsewhere, or move abroad if they are able.

While the desire to move from one place to another is not new to humanity, how do national governments deal with the potential for an increased demand? Further, and within the scope of this research, are different political regimes adopting various norms of citizenship based on political belief? Do, in fact, authoritarian regimes holdfast to the ascriptive norms of blood and soil while non-authoritarian states liberalize citizenship, thereby encouraging populations to freely traverse borders?

This chapter begins my look at the results of this work by focusing on the political characteristics of the world's nation-states. Determining how many countries adhere to authoritarian or non-authoritarian governments allows us to, then, ask "What do their citizenship norms look like?" Within this context, the remaining portion of this chapter will examine the first area of inclusion: naturalization. I find that there is great policy variation

within authoritarian and non-authoritarian states. While generalizations can be made about which norms will be in place in each category, there are notable exceptions to the rule. These exceptions provide the rich contextual discussions of norm expansion.

Political Regime as the Building Blocks of Acceptance

Prior to addressing examples of how countries choose to apply, or eschew liberal citizenship norms, the classifications system used in this work must be addressed. Figure 1 provides a summary of the political regime type for the 198 countries involved in this study. 52 countries were classified as "authoritarian" by the *Democracy Index* (*The Economist 2016*), while the remainder fell into some variation of non-authoritarian regime.

Figure 1: Political classifications of countries included in study (n=198).
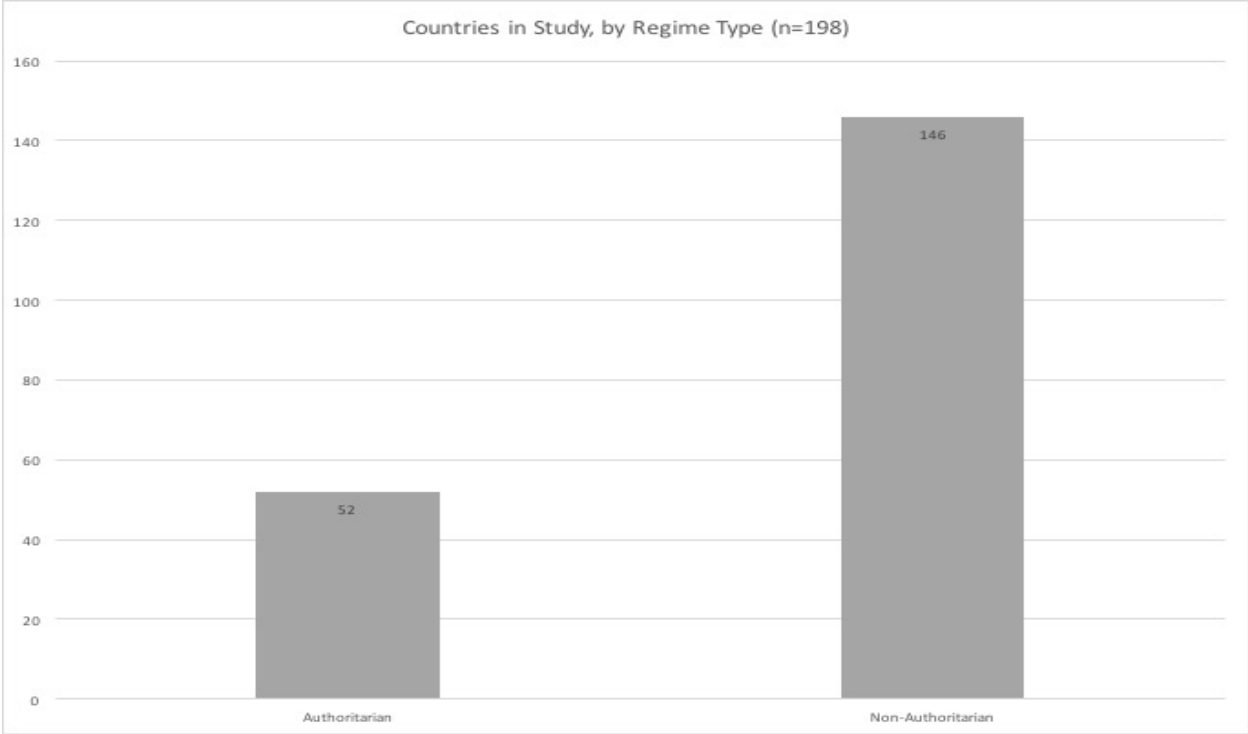
This categorization, certainly, eliminates some of the nuance highlighted in the *Index*

discussed last chapter, but allows for a straight-forward metric for measuring various nation-

states' adoption, or non-adoption, of liberal citizenship norms. Further, my results suggest that

while an adherence to a specific liberal political process can influence a country's inclusive

approach to foreign groups, it is by no means the sole consideration. As such, I observed

situations on both sides of the spectrum where states classified as democracies eschewed

liberal inclusion processes, while some authoritarian states embraced such policies. Certainly,

these states were in the minority of their given political category, but their contrast with the

majority can illustrate the other mechanisms at play during policy adoption.

These conclusions were also identified while considering communist regimes. The

world's six extant communist countries—China, Cuba, Laos, North Korea, and Vietnam—all

have ascriptive citizenship policies in place: citizenship is passed to the next generation by

blood in each country, with Cuba extending birthright citizenship to babies born on the island.

Further, there is some minor variation based on regional history in these countries' dual

citizenship policies. In 2009, Vietnam implemented a policy to legalize dual citizenship for

former nationals who had fled the country to avoid violence, but now wish to reacquire the

status (Vietnam 2009; Zeller 2008). The offer of dual citizenship was also extended to their

descendants in the hopes of convincing those abroad to move bring their knowledge and

capital to the country (Zeller 2008). By comparison, all the remaining communist regimes

explicitly bar dual citizenship.

Now that the political landscape has been mapped, I turn out attention to the

citizenship norms in each category. The next section outlines the naturalization laws employed

by the authoritarian and non-authoritarian regimes in this study. What becomes evident, is that there is not a strict rule in place for either category, but laws on a continuum of access with one end barring access for a small select few, while the other end opens access to, virtually, any interested party.

Historical Inclusivity

As noted in Chapter 2, naturalization was a useful tool for nation-states that sought to increase the size of their populations. Further, citizenship, and the rights associated with it, became a mechanism of control for recently colonized peoples. In this section, I turn our attention away from the generalities of naturalization laws, and toward the specific requirements citizenship candidates must fulfill to gain access to rights. Within this discussion, membership in an ethnic group, language comprehension, and regional history all display their influence on policy and applicants.

Consider the wording used in the citizenship laws of Egypt and Italy. Basic Egyptian requirements to be granted citizenship, after the adoption of their 1975 law, are as follows:

1. Those who were born of Egyptian fathers.
2. Those who were born in Egypt of an Egyptian mother, and a father whose nationality is unknown or who is stateless.
3. Those who were born in Egypt, of an Egyptian mother but their kinship to the father has not been proved legally.
4. Those who were born in Egypt of unknown parents. A foundling in Egypt shall be considered as born in it, unless otherwise proved. (Egypt 1975)

Here is the wording from the Italian citizenship law of 1992:

1. The following shall be citizens by birth:
   a) any person whose father or mother are citizens;
   b) any person who was born in the territory of the
      Republic, either where both parents are unknown or stateless, or where he or

she does not acquire his or her parents' citizenship according to the law of the State to which the latter belong;
2. Any person who is found in the territory of the
    Republic, whose parents are unknown, shall be deemed a citizen by birth, where their possession of any other citizenship cannot be proven. (Italy 1992)

While there are notable differences in the gendered nature of citizenship present—Egyptian citizenship being inherited from one's father, specifically, while the status can be inherited from either parent in the Italian case—the general language used in the laws and their structure is virtually identical. Both countries elucidate who qualifies as a citizen, the way the status is garnered; in these cases, via *jus sanguinis*, unless there are extenuating circumstances. Later in the documents, the rights associated with membership, the processes of naturalization, and which offices and individuals are responsible for addressing citizenship concerns are outlined. The question, then, can be asked: Why do two sovereign and unrelated countries use similar formats and language? From a world society perspective, it is due to the external pressures of a global system. Governments expect other governmental bodies to deal with this topic in a consistent way. Questions like "Who's responsible for this individual?" and "Who can I talk to about becoming a citizen?" are clearly answered in each document. Further by following the format and wording of other national laws, countries strengthen their legitimacy in other realms. Other countries will be more likely to treat them as equals during citizenship discussions since their laws are worded similarly. Finally, transnational organizations can help ensure that these countries take this topic seriously (Guillén 1984; Meyer 1987; Ramirez & Meyer 1998).

Further, societal expectations drive a "bottom-up" force of coercive isomorphism. From this angle, how the general population thinks the organization should behave and what policies

it should put in place direct organizational development (DiMaggio & Powell 1983). In the case of citizenship law, such influence is couched in the discussion of expanding group membership. The question of "Who can join?" becomes dependent on the general population's seeming acceptance of the group in question. Immigrants stemming from groups that are valuable assets—perhaps by plying a specific trade, being perceived similarity to the immigrating group, or benefitting from positive stereotypes—are more likely to be viewed positively by the populous (Aktürk 2012; Brubaker 1992, 1996; Sassen 2006). Further, these positive views make it more likely that the populous will, at least, accept policy favoring the naturalization of these groups, or perhaps even push their officials to create such policy.

Liberal citizenship norms are heavily integrated into the processes of movement, settlement, and inclusion. However, the relative acceptance and adoption of liberal citizenship norms are not necessarily conditional on a nation-state's practice of democracy. Benhabib (2004) has noted that there is an inherent conflict between the liberal democratic ideal of inclusion and a nation-state's right toward political self-determination. This type of discord— between the ideal and the political—can place stress on regimes that rely on the benefits of having diverse societies to help navigate transnational relationships (Benhabib 2004). Further, perceived ill-treatment of foreign workers may hamper national efforts to lure them into jobs in the national economy (Joppke 1998; Sassen 1999).

Yet, our general assumptions that liberal state norms are tightly bound to the democratic political system may not be borne out by reality. One important aspect of the democratic state is that public opinions matter (Hampshire 2013). Citizens can have a direct effect on policy decisions by exercising their political rights, engaging in protest, or contacting

their representatives in government. That said, it is worth considering where "the people" tend to fall in the citizenship conversation. Are the people overwhelmingly welcoming immigrants with open arms, or do they think the best course of action is to fortify all national boundaries? As with any sort of public polling, the results are mixed. Hampshire (2013) notes that there is a general opposition to immigration among those living in democratic countries. The public tends to think that there are too many of "them" here already so steps should be taken to stem the flow of additional migrants.

Such anti-immigration sentiment tends to fall along two general lines. The first highlights the economic concerns of the local population. This is, in short, the "they'll take our jobs" argument (Hampshire 2013). Citizens born in the region view immigrants as direct competitors for work, thereby these foreign-born groups are threats to the citizens' perceived economic livelihoods. Keeping "them" out helps ensure that "we" have jobs and maintain our standard of living. The second, and more frequently employed, line of thinking falls along the seemingly incommensurable nature of identities (Hampshire 2013; Huntington 1993). Here, citizens argue against admitting new immigrants due to "their" culture being too different than "ours," and, thus, new immigrants will not be able to fit into the dominant culture. Further, this in-group favoritism versus out-group hostility is thought to be based in a fear of diluting the dominant culture (Appadurai 2006; Hampshire 2013). The perception is that, somehow, by admitting those with different beliefs and practices will pollute the nation and lead to it being irreparably damaged (Douglas 1994).

Despite concerns arising from the populace regarding the impending problems immigrants pose to the nation-state, democratically elected leaders still push for liberal

citizenship policies. Hinnebusch (2000), Holston (2008), Habermas (1989), and others have noted the disconnect between policy makers (political elites) and those who must live their lives by the policy's guidelines (citizens). Using Brazil's political history as an example, Holston (2008) notes that increased rates of democratization and globalization have stimulated conflicts between citizens and rulers. Within this context, one of the fundamental disagreements between the rulers and the ruled revolves around the use of the term "citizen," itself. The Brazilian government has based an individual's access to rights on identifiable social markers, including gender, socioeconomic status, education level, and race, thereby creating a hierarchical system based on one's level of inclusion (Holston 2008:7). Like other nations' laws, Brazil's naturalization laws are generally open to any applicant seeking citizenship. Anyone who is of legal age and able to make their own decisions (mental competence), has registered as a permanent resident and lived in the country for the four years prior to filing their application, has language proficiency in Portuguese, has a legal means of income, and has not committed any crimes can begin the naturalization process (Brazil 2017).

However, Brazilian citizens have differentiated between a possessor of citizenship and one who has ties to the country. Colloquially, they use the term "citizen" to indicate the "other," or to identify someone who does not have an intimate connection to the speaker, via friendship, familial ties, etc. (Holston 2008). Ultimately, what the Brazilian account highlights are situations where the citizenship process is no longer based on inclusion, but is, instead, a study in the limits of liberal inclusion.

Given the described disagreements towards inclusion and citizenship displayed by the state, what many states display is a "…Janus face towards immigration…" (Hampshire 2013:13)

where foreign workers are sought to fill local labor needs, but denied inclusion via citizenship so they can be deported when the job is done. As such, liberal citizenship norms—most commonly the naturalization process, in this case—allow the nation-state to exert its power by creating selection criteria. Even in democratic regimes, legal guidelines can be created to identify who can become "one of us" and who is left outside the state's protection (Jacobson 1996; Joppke 2010; Somers 2010). Therefore, despite suggestions that the (liberal) nation-state is losing its influence on the world-stage and international organizations are driving the discussion on what constitutes a citizen (Benhabib 2004, 2005; Hampshire 2013; Joppke 1998; Kymlicka 1995; Sassen 1999, 2006; Soysal 1994) increased attention to citizenship norms and the selection criteria used for membership suggest that nation-states remain in power and are driving the adoption of citizenship norms and who can become a member (Basch, Schiller, & Blanc 1994; Bourdieu 2014; Jacobson 1996; Meyer 2010, 2010a; Meyer, Boli, Thomas, & Ramirez 1997).

One can see evidence of these pushes in the legal record. Naturalization policies that highlight that citizenship applicants must hold a specific ethnic status, or "fit" with the dominant group show up frequently. One may suspect that ethnic requirements for inclusion, are limited to authoritarian regimes, but there is evidence of these policies in non-authoritarian regimes, as well. Within systems restricting ethnicity, a culturally and ideologically homogenous population allows for some of the basic components of group unity to exist. Group membership is strengthened via shared religious beliefs, affinity towards nationalistic iconography (symbols, songs, and holidays), and views about "dangerous outsiders." I, by no means, intend to create generalizations about citizen populations by claiming that all individuals within a nation-state think in uniform ways. Instead, I suggest that in these cases a dominant majority—either vocally

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or silently—supports what Aktürk (2012) referred to as monoethnic citizenship policies to create an ethnocultural state (Brubaker 1992); policies actively favoring a single ethnicity while actively discriminating against all others. As the result of monoethnic pursuits, the created society looks *culturally* the same.

Consider the case of Germany's restrictive citizenship policies. Until recently, German laws have routinely barred those who could not trace their familial heritage to an identifiable German ancestor from naturalizing. Simply put, unless an applicant can show the government proof, they will not be approved. What these policies created was the very essence of the monoethnic state, and the citizenry, generally, accepted these processes. Further, naturalization restriction meant that the population of guestworkers in the country (mainly Turkish emigrants or their descendants) could not gain citizenship, despite playing an active role in the national economy (Aktürk 2012). Emphasizing the cultural basis of citizenship, opposed to one's location of residence, helps define citizenship within the German way of thinking: citizenship is a cultural fact, not a political one (Brubaker 1992). That said, Germany is also a "full democracy" according the 2015 Democracy Index (*The Economist* 2016). Essentially, German citizens are saying that they have accepted the ethnocultural basis of their citizenship, or are at least satisfied enough that they are not calling for politicians to reexamine the laws. These signals are continuing in the face of Chancellor Angela Merkel's recent push for extending dual citizenship to the children of immigrants. A call that has received significant criticism across the political spectrum (Huggler 2016).

To return to Egypt's citizenship law, one sees a similar emphasis on group membership. Also, the patriarchal nature of citizenship in the state is revealed at greater length. While much

of the language outlining the process of naturalization is common to other documents—length

of legal residence, the applicant being in good health and not committing any crimes, etc.—

there some specific stipulations. First, in point three of Article 4 of the Egyptian law (1975), the

following statement regarding who may be granted Egyptian nationality is presented:

> To any foreigner born in Egypt of a foreign father who was also born in it, if such a foreigner *belongs to the majority of inhabitants in a country whose language is Arabic, or religion is Islam*, if he applies for the Egyptian nationality within one year form the date he attains full age. [italics mine]

A second, and common, prerequisite for naturalization is the ability to speak the local dominant

language. Point four of Article 4 states that "…he should be acquainted with the Arabic

language." (Egypt 1975).

What both points attempt to ensure is that potential citizens will be able to assimilate

into the dominant culture quickly. Point four—while confirming that the individual will be able

to navigate daily life in Egypt—also draws upon the ethnic basis of the imagined community. By

being able to speak the dominant language, one will be able to better identify with the

nationalistic tendencies and practices of the region (Anderson 2006). The new citizen will be

able to learn the cultural norms, signals, and processes, thereby making them a contributing

citizen faster if they can speak Arabic, compared to a non-speaker. Point three seeks to

maintain a monoethnic state. While a minority of Egyptians speak English or French and

approximately 10-percent of the population is affiliated with Christianity (Central Intelligence

Agency 2013), the citizenship policy in place actively favors dominant norms. Essentially, the

policy is claiming that if one's father grew up in an Arab country, they will understand Egypt.

This emphasis is so strong that there is a single line in Article 16, outlining the revocation of

citizenship, that the Ministers Council can strip Egyptian nationality from an individual on the

grounds of ethnic allegiance. "If at any time he has been qualified as a zionist [sic]" (Egypt 1975) an Egyptian can lose their nationality; so, like Germany, Egyptian citizenship has an active ethnocultural basis in its law.

Afghanistan's citizenship law has, recently, seen a shift in language, while attempting to maintain its ideological roots. The legal basis for citizenship in Afghanistan was grounded in the 1936 "Law of Citizenship in Afghanistan." This document was designed to incorporate the tenets of the 1930 Hague Convention into national law to create space for women's citizenship status, as well as the statuses of children (Athayi 2017). Like the other legal documents cited in this work, the structural similarities to other items are easy to identify, such as similar wording, the ordering of sections (in this case dividing topics into "Articles"), who to contact with any questions regarding one's rights, and a date of ratification. However, there is a notable shift in language between the law of 1936 and the most recent incarnation of 2010: the inclusion of ethnicity. In 1936, the naturalization process was open to anyone who could share basic familial information—e.g. names, birthdates—and accompanying identifying documentation, provide reasons for leaving their former state and plans for the move, local occupancy plans, identifying photographs, and furnish a signed statement stating that he did not have a criminal past (Afghanistan 1936). The generalities of the law suggested that the naturalization process was open to anyone who wanted to move to the country and could support themselves.

The 2010 law saw significant linguistic changes. While structurally comparable to the earlier mandate, a noticeable change is in the title of the document. While the 1936 law simply stated what the document is and where the law applied, the 2010 update injected ethnicity into the law: "Law on Citizenship of the Islamic Emirate of Afghanistan." By marking official

documents using this title, government officials are stating that to be considered Afghani, one must also be Muslim and follow the tenets of that culture. While making no restrictions on naturalization based on ethnicity, a later article suggests that nationality can be "…obtained according to the norms predicted in the international treaties *unless they contradict the tenets of Islam*." (Afghanistan 2010:5; italics mine). This leaves interpretive space within the law. While an applicant may meet the basic requirements, if they are deemed a threat to national security, or somehow even a potentially troublesome individual, they can be barred access to citizenship.

As such, the 2010 law is a difficult case where there is evidence of a government trying to adhere to the international standards of citizenship, especially regarding the rights of women and children, but have ethnicity written into the text. Athayi (2017) highlights the difficult history in the region and its effects on governmental policy. After the US invasion following the terrorist attacks of September 11, 2001, the Afghani government was crippled. With the election of former President Hamid Karzai, the government began to rebuild and further pushed toward inclusive citizenship policies. At that stage, dual citizenship was treated as an inevitability due to the large numbers of Afghan refugees who had fled the country during the ongoing violence (Athayi 2017). In addition, Afghanistan has also been dealing with national security due to its status as a central travel hub in Asia. In general terms, the geography and political environment make it difficult to evaluate all individuals seeking to cross its borders legally, let alone prevent those who cross for more nefarious means (Athayi 2017).

Given the storm of events engulfing the region, Afghanistan's citizenship policy and its changes have accomplished mixed goals. First, there is an institutional push toward adhering to

the world scripts of liberal citizenship. Dual citizenship has been adopted and language has been put into place to create a more inclusive population. However, there is also concern about what such policies will do to the country. If the doors are open to everyone, will Afghanistan still be for the Afghani people? The language regarding ethnicity in the 2010 law reflect this concern. This concern is also fueling the "open door" appearance of their naturalization process and citizenship. Policy makers want to allow Afghans who fled the region to be able to come home, and until that goal is accomplished, the law on the books will be useful.

Certain Uncertainty

What the previous examples show us, is that there are wide variations present in citizenship norms. While this is not a surprising fact, their presence at the foundational elements of inclusion suggest that political regime is not the only factor dictating whether citizenship norms are adopted. Whether the laws at hand be Egyptian, Afghani, or German, the citizenship norms codified into national law are dependent on each region's history, their dominant group, and culture. This complexity will be further examined in the following chapter, when the remaining two areas of liberal citizenship will be examined. Dual citizenship and CIPs, while aligned with the human rights norms of postnational citizenship or cosmopolitanism, are further evidence that citizenship scholars cannot consider political system, alone, when studying how citizenship norms have spread. I argue, that such complexity should inform and drive each examination to provide a holistic look at the question at hand.

Chapter 5
Unequal Statuses: Citizenship, Social Class, and Opportunity

While the last chapter laid out how regimes have dealt with the most basic method of inclusion—naturalization—what follows focuses on the nation-state's loosening grip on citizenship. What do norms begin to look like when they begin to follow Soysal's postnational hypothesis? What happens when one is free to choose not only their residencies, but also their bundles of rights? Dual citizenship and CIPs allow many individuals to make such choices, but the opportunities are not universal. As shall be shown, while dual citizenship acceptance is increasingly common on the national stage, but how do states deal non-nationalist stance? Further, what happens when people are free to buy citizenship in places they may have never been? I posit that despite these pushes for a, relatively, deterritorialized existence, the nation-state is still playing a significant role in ensuring rights and identifying who can receive them.

In the first of these situations, dual citizenship, one begins to see a dissociation between the nation-state and those who hold more than one status. Within the context of this research and citizenship literature, dual citizenship occurs when an individual holds citizenship rights from two countries. This translates into situations where an individual could hold some influence in the political processes of two distinct nations, participate in each country's economy, and gain access to the travel rights of each region. While this mutable status holds increased benefits for the citizenship holder, it creates a distrust that many government officials and the public, have toward dual citizens. Those with "other" citizenships may have their allegiances questioned, as those in power question how an individual could display loyalty

to more than one nation and undertake the basic institutional concerns of guaranteeing rights

and legal protections (Brand 2006; Sassen 1999; Spiro 2008).

CIPs are the loosest attachment to place within the spectrum of this research. These

programs are increasingly popular with three groups occupying two spheres of influence:

dominant groups in sending countries, those same groups in receiving countries, and business

elites who frequently cross-national borders. Within the context of inequality, the sender-

receiver relationships between dealing states can be indicative of the states' status in the

international economy. In the case of sending countries who are seeking to expel specific

groups from their borders, affluent states dictate the "terms and conditions" for deals to

poorer states, thereby creating systems of dependence. If the subordinate state wishes to be

included in the deal, they must conform to the demands, or face replacement. Within this

transnational field, CIPs can prove to be beneficial for states in two interrelated realms. First, it

can aid sending countries with the removal of "unwanted" groups. As illustrated in the second

example at the start of this work, the UAE sought a deal with the Comorian government to

purchase a larger number of passports for their stateless workers. In short, what this allowed

the UAE government to achieve was the legal deportation of such workers from their country,

while simultaneously acting in a, superficially, beneficent way by giving deportees legal

connection to a state. By undergoing deportation, the *bidoon* could gain access to rights and

resources that they could not, if they had remained in the UAE.

CIPs not only benefit the sending state by removing of "other" populations from within

its borders, but the receiving country—the one providing the citizenship documentation—also

can garner significant financial returns during the transaction. Prior to the UAE's agreement

with Comoros, the small island nation was experiencing numerous economic hardships. The government was unable to provide many basic amenities to its citizens, including a reliable source of electricity, due to its outdated infrastructure (Abrahamian 2015). The passport deal with the UAE, then, appeared as a tool to do some social good. Ideally, selling a set number of passports to the UAE, would allow Comorian nationals to live more safe and enriched lives (Abrahamian 2015). The economic rationale Comorian officials used to approve their deal with the UAE is not hard to understand; the country was struggling, and they wanted to help their people. However, the cultural, ethical, and ideological calculus is more difficult to solve. How does one justify selling a set of rights to people who were not born in the country or may have never been there?

The final group of beneficiaries of CIPs are the transnational business workers who can now traverse boundaries with, relative, ease. As Ong (1999) notes, holding multiple passports not only allows for some individuals to garner economic benefits others are excluded from, but it can also act as a form of social capital, where those holding the largest and most diverse passport portfolios may be more effective deal makers with a larger and more international social network. Those who are more affluent have distinct advantages in terms of moving capital, traveling between regions, and the status that comes along with these abilities.

What's in a Title?

The previous chapters' discussion on the promulgation of countries' citizenship laws and naturalization processes help illustrate the first step in moving towards liberal forms of citizenship. In this section, I direct our focus to the second and third signs of the liberalization

process, which illustrate a further deterritorialization of citizenship: dual citizenship and CIPs.

Dual citizenship adds a level of flexibility for the individual, where they can, potentially, glean the benefits of two sets of rights. They may be able to influence the political processes of two nations by their dual enfranchisement. Dual citizens may be able to hold property and open businesses in both of their countries; symbolizing access to capital and banking in both places, as well. Finally, they also may gain the "right" to pay taxes in both areas. While this final point may not be a particularly positive notion, nonetheless it acts a symbol of allegiance with their countries.

Holding citizenship in two or more countries is becoming an increasingly accepted phenomenon. Figure 2 shows that two-thirds of this study's countries (131 of 198) have adopted a form of dual citizenship policy or allowed some sort of similar existence. However, this number does not completely overlap with the types of political regimes here. Of non-authoritarian regimes, about 79-percent (115 of 146) have implemented dual citizenship policies. Non-authoritarian regimes are not the only ones to shy away from the citizenship norms of their political classification. Authoritarian regimes electing to implement dual citizenship policies, while in the minority in accounting for 30-percent of all authoritarian regimes (16 of 52), account for approximately 12-percent of all adoptees (16 of 131) (see Figure 3). Given these results, I argue that while political regime type is a contributing factor when adopting liberal citizenship norms, it is not the only factor at play.

Figure 2: Summary of countries adopting or eschewing dual citizenship policy. (n=198)
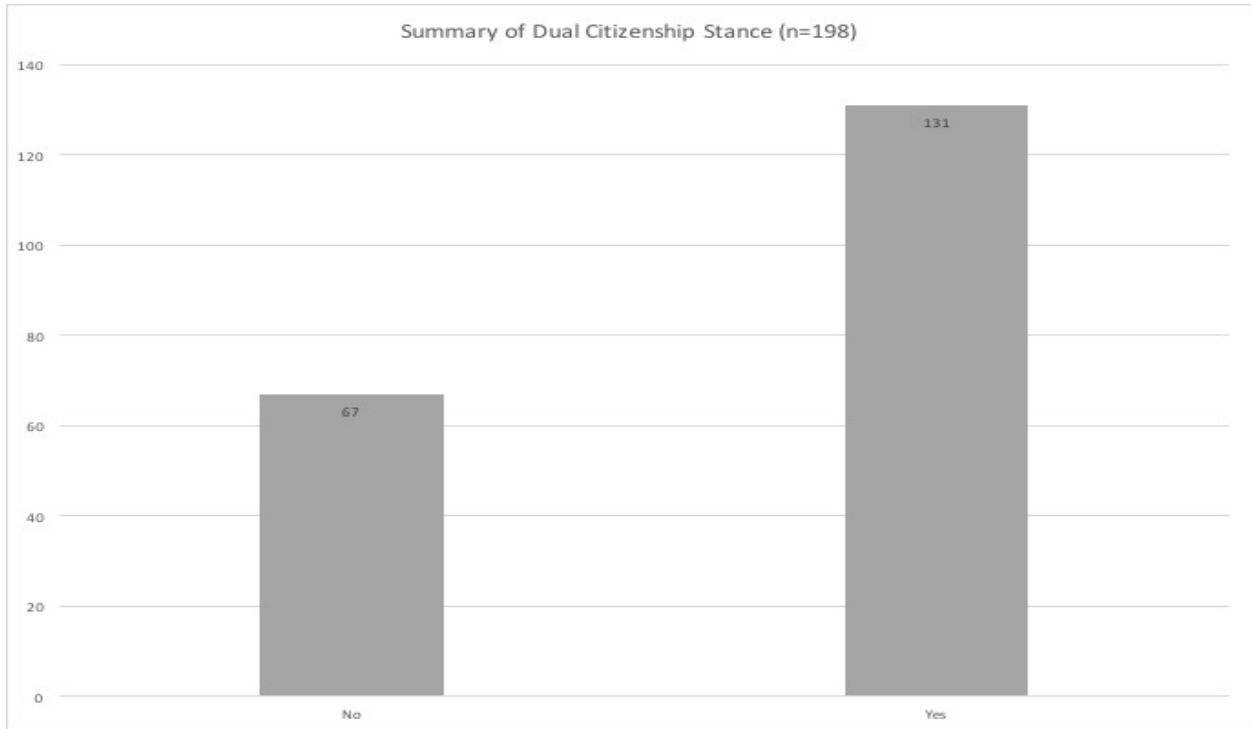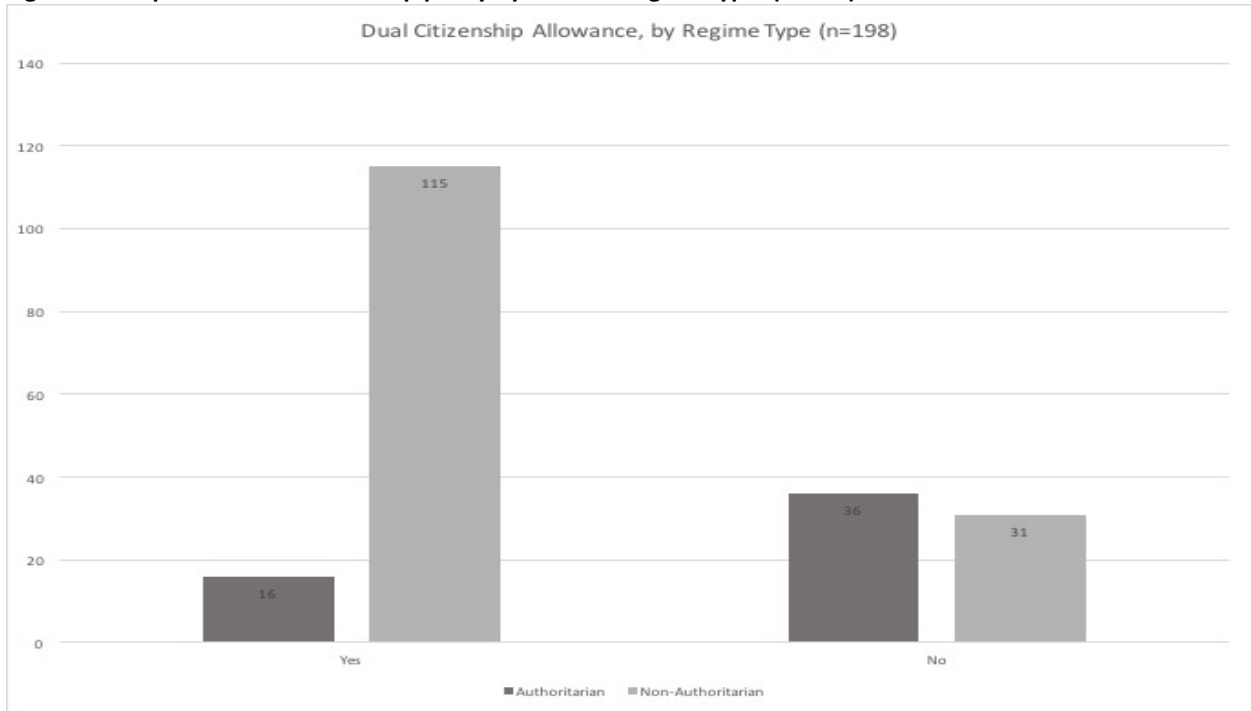

Figure 3: Adoption of dual citizenship policy by national regime type. (n=198)

As noted earlier, a fundamental conflict within the dual citizen status is of allegiance. Within the traditional Westphalian system of citizenship—born from the development of the nation-state in Europe—dual citizenship is an unthinkable status (Brand 2006). Not only due to the previously mentioned questions of allegiance that arise from dual loyalties, but from the logistical concerns over which state is responsible for providing rights to the individual. The modern state was developed on the grounds of sovereignty, and its citizens were expected to show their allegiance to the state via their active involvements in the political and social systems (Sassen 2006). Further, if individuals expressed high levels of nationalism and viewed their rulers as legitimate, they were less likely to accept the possibility of dual citizenship (Brand 2006). When this link between the ruler and the ruled begins to breakdown, or the nationality and naturalization processes become disjointed from one another, one is more likely to see a rise in dual citizenship policy, despite federal distaste for the status (Spiro 2008). However, in the reality of the post-Cold War global world, dual citizenship has become a more frequently occurring status (see Figure 4), with the number of countries adopting dual citizenship policies increasing sharply since 1990. Not only are states legally describing the status, but the public is also beginning to see it as increasingly "normal." Further, this new reality is falling in line with liberal (e.g. cosmopolitan) conceptions of citizenship—those built on shared definitions of human rights, not solely on one's birth location or family lineage—and has even received calls to be considered a human right (Spiro 2010).

Figure 4: Trend in dual citizenship policy adoption among practicing countries. (n=131)
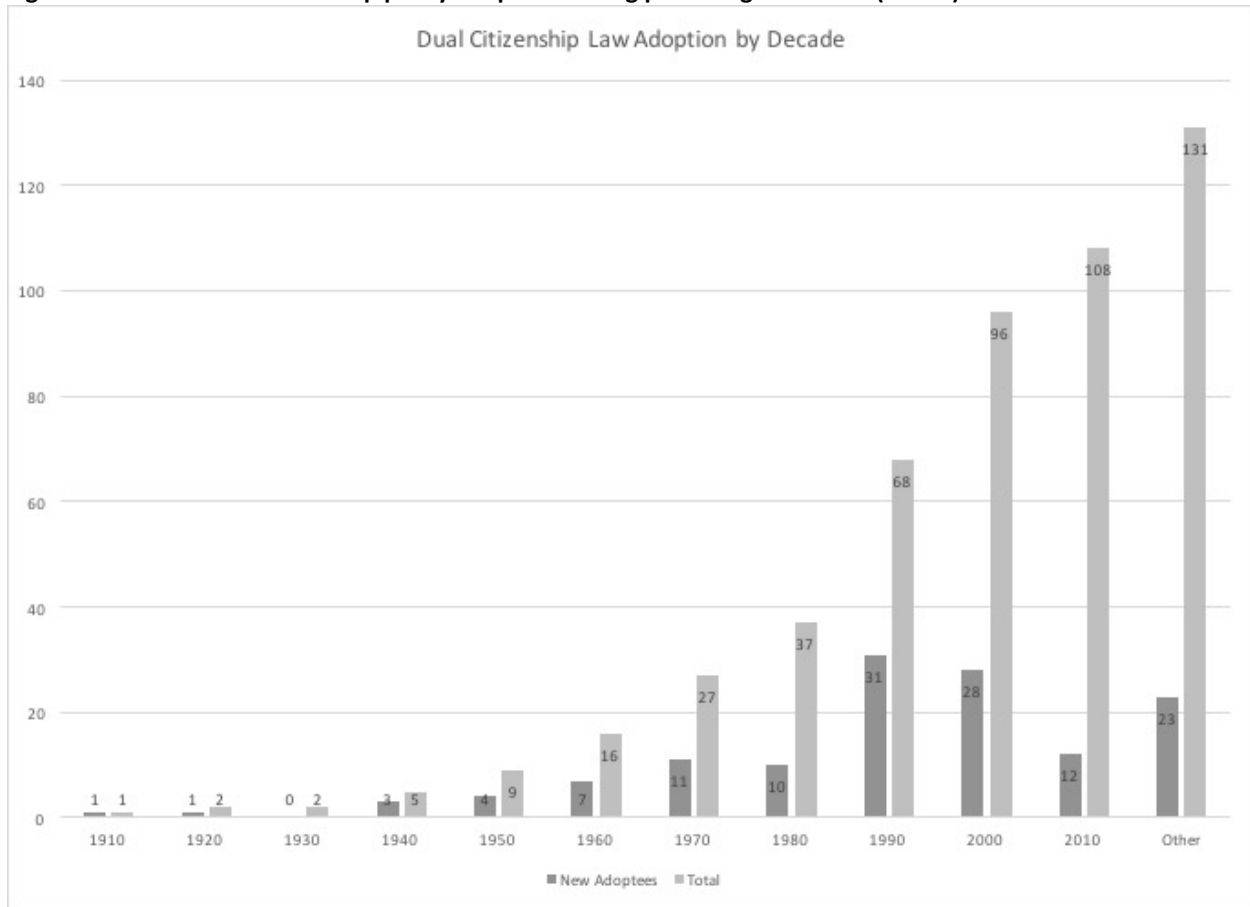
Unlike the legislative policies surrounding naturalization and the basic definitions of citizen, dual citizenship laws are fairly muddled. Dual citizenship statuses have tended to exist as bureaucratic loopholes. Early forms of the laws often surrounded children born in *jus soli* regions to non-national parents and being forced to decide which country they "belonged to." Further, these decisions were intended to be made by the time the child reached the legal age of adulthood. As such, when the child was no longer a dependent of their parents, they were required to declare their allegiance. However, it should be noted that in these cases, the dual citizenship status had an expiration date. States recognized that children were tied to their

parents and, thereby, subject to their decisions, but also that the norm of single-nation citizenship should be upheld.

A second state of dual citizenship relies on the renunciation of former statuses. In these cases, individuals can become dual citizens after becoming naturalized into a country that does not require them to renounce their other statuses as part of the legal process. Once that naturalization process is complete, the individual is of two countries, and this ambiguity shows up across nations without stated dual citizenship policies. The Philippines (Philippines 2003), Egypt (Egypt 1975), Hong Kong (GovHK 2017, Ong 1999) and the US (U.S. Department of State Foreign Affairs 2005) are among world countries that have this ambiguity present in their policies. While dual citizenship may not be officially endorsed, it is still a potential reality for those living in these regions. In the case of Hong Kong, the process of maintaining dual citizenship is particularly convoluted. Hong Kong has been subject to China's citizenship laws, which explicitly ban dual citizenship, since the British ceded sovereignty in 1997. However, Hong Kong's place as a world economic and business center allowed it some freedom as to how the law was enforced. As such, citizens of Hong Kong who held multiple passports, or later gained additional ones, would only lose the documents if the they filed to have their new nationality formally recognized (Ong 1999). This allowed for the proliferation of the flexible citizens Ong (1999) observed, since individuals could hold numerous passports, as long as they did not file the paperwork. As Ukrainian governor Ihor Dniepropitrovsk noted when asked about holding three passports despite dual citizenship being illegal in his country, "Yes [it is illegal]. But it [the Ukrainian constitution] does not say anything about triple nationality." (Abrahamian 2015:74).

However, as my results have shown, dual citizenship policies have begun to be included in updated national laws and public statements across the globe, thereby institutionalizing the status. Finland's immigration service webpage (Finnish Immigration Service 2017) notes that dual citizenship is acknowledged by the government. However, it does warn dual citizens that they may not be treated as a Finnish citizen by states that do not recognize dual citizenship. In 2012, the Haitian government struck a series of amendments from its 1987 constitution, making a path through which dual citizenship became law (DiLeonardo 2012). A caveat to the Haitian plan is that dual citizenship holders are barred from running for "four key political positions—president, prime minister, senator or member of the lower house of Parliament, the [sic] Chamber of Deputies" (Delva 2012).

Economic concerns are also at play when countries elect to adopt dual citizenship policy. Table 1 outlines the top ten national recipients of remittances in 2016, taking into account their dual citizenship laws and government type. From this, eight of the ten countries have some sort of dual citizenship law in place, and the same number are classified as non-authoritarian regimes (the outliers are China and Egypt, and China and Nigeria, respectively). When considering the amount of foreign direct investment (FDI) in each country, China is the highest recipient among these countries, and receives the third highest amount of monetary investment worldwide, behind the US and Germany (Laudicina & Peterson 2017). Taken together, remittances and FDI numbers are indicative of national economies that benefit from foreign-based (or earned) money.

The billions of dollars being sent home from foreign-based workers is a boon to the local economies receiving the funds. Recipients inject money into local businesses via their

purchases, payments for housing, and the national government via sales taxes and other fees.

From a Marxist perspective, easing limits on the amount of money foreign-based workers send

home while lowering the taxation rate of these transactions, thereby making it easier for

money to be sent "home," is a free source of capital for the government and capitalists (Marx

1972). They receive the benefits of a worker's labor—in this case, the money sent to family—

without having to provide the capital required to produce anything. Thus, lowering the barriers

to getting remittances into the hands of local consumers, renters, laborers is beneficial to the

state's elite.

Table 1: Top 10 Recipients of Remittances

Country	Remittances (in thousands of USD, 2016)^	Foreign Direct Investment (2017)+	Dual Citizenship Status	Regime Type
India	$62,745,000.00	$44.2 billion	Allowed	Non-Authoritarian
China	$35,225,583.77	$135.6 billion	Not Allowed	Authoritarian
Philippines	$31,144,632.28	$5.2 billion	Allowed	Non-Authoritarian
Mexico	$28,667,958.48	$30.3 billion	Allowed	Non-Authoritarian
France	$24,220,419.13	$42.9 billion	Allowed	Non-Authoritarian
Pakistan	$19,846,568.13	$864.7 million	Allowed	Non-Authoritarian
Nigeria	$18,956,000.00	$3.1 billion	Allowed	Authoritarian
Germany	$16,683,183.24	$31.7 billion	Allowed	Non-Authoritarian
Egypt	$16,584,486.59	$6.9 billion	Not Allowed	Non-Authoritarian
Bangladesh	$13,679,834.11	$2.2 billion	Allowed	Non-Authoritarian

^ values from (World Bank 2017), + values from (Heritage Foundation 2017)

While the previous situations highlight the actions of those in favor of dual citizenship

policies, it is worth remembering that there are still nations and populations that have come

out against the status. Aside from explicitly barring individuals from gaining the status, there

are public political debates calling into question the goals of dual citizens and their legitimacy.

In addition to previously mentioned ongoing debate surrounding German dual citizenship, a

brief article from the Kuwait Times (2015) website outlined how the Kuwaiti government's

Nationality and Passports Department was in the process of gathering data on suspected dual

citizens. While the information discussing why the individuals were selected was limited, the

government was contemplating revoking their national statuses. Similarly, ten former citizens

of Oman were stripped of their citizenship for being dual nationals (Al Mukrashi 2016). To close

some of the bureaucratic loopholes, Russia—which allows dual citizenship—made hiding dual

citizenship a criminal offence in 2014 (Vityazeva 2014). Those failing to report theirs, or their

children's, second passport within two months of receiving it would be subject to a monetary

fine—estimated to be between $14 and $28—and if it was proven that the status was

intentionally hidden, offenders would be fined approximately $5,530 "or be obliged to perform

400 hours of compulsory community service" (Vityazeva 2014).

Certainly, what one sees in these examples is the push back of agents against liberal

citizenship norms and the increasingly popular script of dual citizenship. As such, it is necessary

to remember that while world society theory exists within a world culture that seems

unavoidable and all encompassing, bureaucracies also have mechanisms in place to allow for

limited agentic action, or deviance from the norm. Simply because an individual is in a powerful

position and is confronted with a script others have adopted does not mean that they will

unthinkingly put it into place. Instead, their position is tied to the authority and legitimacy

granted by the system; it is limited by the history of the region and who has ruled before. One's

connection to history is where script non-adoption can occur, and countries go against other

similar states. Essentially, this is what can allow a non-authoritarian regime to eschew dual

citizenship norms, or even liberal naturalization policies, while some authoritarian regimes

embrace liberal citizenship policies while their allies buttress their borders with exclusionary rules.

The rise of CIPs stem from the growing acceptance of dual citizenships, but the accessibility of these programs and the ethicality of selling citizenship has become focus for scholarly debate (Shachar & Bauböck 2014). In general, selling citizenship is seen as negative due to its trivializing the status by making it accessible to those who can afford it (Armstrong, 2014; Berton 2014; Spiro 2014), thereby exacerbating the already classist connections group membership. However, there is a line of thinking that suggests that nations should be able to treat citizenship as a commodity; something to sell or give away as they deem fit (Hidalgo 2015; Paskalev 2014). Ultimately, the state is the body granting and/or limiting access to their set of rights, so the sale of these rights is just the state further extending its reach in this realm.

Given the open marketplace for "golden passports," those with the financial means to undertake the process gain a significant advantage over those who have limited funds. For the right price, an individual—and sometimes their family—can gain the travel rights and access the financial institutions of a participating country. Essentially, if one can afford to pay the application and processing fees and meet the basic requirements for application, they can gain access to a new set of rights. From the perspective of citizenship research, this area has received little attention. Apart from the ethical discussions surrounding whether countries should be selling a status that others access via birth, scant research has investigated the development of policies, spread of the programs, and the social implications of their use. It is within these areas that this writing can add insight. Holistic data surrounding CIPs is, generally, lacking. It is difficult to find accurate estimates of how many people are annually acquiring

citizenship this way, the demographics of CIP applicants (locale of birth, income level, etc.), and

if they have held, or currently hold, any other citizenships. Internet searches for CIPs and

countries that offer them often lead to business articles summarizing which countries are the

cheapest, or which country's citizenship has the "best value" for the investment. In addition to

these lists, one can easily locate law firms or other contractors that act as representatives for

CIP applicants. Essentially, applicants pay these firms a set fee (in addition to the CIP

requirements) and they will complete the process.

Superficially, this lack of general data can be troublesome. How do researchers gain

insight into a global process if one cannot get basic information about who is utilizing these

programs and how many people already have? Despite such uncertainties, I argue that

shedding light on these process, even in the broadest forms, will help future work. According to

the extant research focusing on the types of people who utilize these programs (Altan-Olcay &

Balta 2016; Ong 1999), they are mainly of the economic elite. Holding multiple citizenships has

become a sign of social status among Southeast Asian businessmen (Ong 1999) and gaining

access to more than one set of rights can give children a substantive advantage over their

contemporaries (Altan-Olcay & Balta 2016). As such, I would not be surprised to see possessing

multiple citizenships as a modern marker of one's membership in the power elite.

Mills (2000a) noted how members of the power elite not only live a lifestyle that many

people cannot imagine—residing in mansions, holding memberships in exclusive social clubs,

etc.—but that their lifestyles also grant them privileged access to various institutions. One of

the fundamental concerns, was that members of the elite could gain influence over political

leaders, that the average citizen could not, thereby having their concerns viewed as more

important than the general population's. Within this thread, flexible citizens, too, could gain influence on a global scale. They can more easily traverse national borders without the restrictions others face due to their access to multiple sets of rights. They can be active in numerous national banking systems by holding property and business interests in multiple countries. Paired with the prestige of having a "rights portfolio," holding multiple citizenships creates individuals who are, in some ways, "superior" to the rest of society.

My central focus in the CIP realm is how these programs exacerbate inequalities (Abrahamian 2015; Ong 1999). As part of my examination, a comprehensive list of extant CIPs has been compiled, including the requirements for applying for citizenship and what can be gained with membership (Table 2). Ultimately, those who can afford to purchase additional statuses hold a significant advantage over those who cannot. Further, parents have begun to actively seek out these advantages for their unborn children via the process of "birth tourism" (Altan-Olcay & Balta 2016). "Birth tourism" seeks to take advantage of the ambiguities in many countries' citizenship laws by creating situations where children are born as dual citizens; gaining *jus soli* citizenship by being born in a specific country and *jus sanguinis* based citizenship from their parental heritage. These children are, thus, born with two sets of rights, whereas most children are born with a single set.

Such economic transactional relationships associated with citizenship are a relatively new phenomenon. The earliest program in place was enacted in 1984 by St. Kitts & Nevis. For a non-refundable donation of $250,000 to the St. Kitts & Nevis Sugar Industry Diversification Foundation or $400,000 investment in local real estate, applicants could gain the rights afforded to any St. Kitts & Nevis birth citizen (Gittleson 2014). Further, these rights were

available as soon as an applicant had been approved, guaranteeing immediate benefit from

their donation. The travel rights associated with St. Kitts & Nevis citizenship have been

particularly alluring to certain nationalities. For example, Middle Eastern investors can gain the

ability to travel to the United States without having to undergo the normal visa process. Instead

of waiting for months to be approved for a travel visa, Middle Eastern born St. Kitts & Nevis

passport holders could, instead, produce their purchased passport for their identification,

thereby skipping the wait period. St. Kitts & Nevis citizenship is additionally attractive to

investors since there is no formal period of required residency for investors to maintain their

citizenship status. This means that investors could, potentially, have the entire application

process taken care of by their representatives (e.g. lawyer, banker, or other advisor) and

become citizens without setting foot on, or residing in, the islands.

As of this writing, 42 nations have implemented some form of CIP, with most programs

being founded after 2010. While the St. Kitts & Nevis plan is among the least expensive and

minimally restrictive policies in place, it does not represent what many programs look like. For

most policies, there are government mandates on how the application investment will be used

and a residency period is required to become eligible for application. In addition, some period

of residency is often required to maintain one's citizenship status. For example, Spain's CIP

requires that investors spend at least 185 days per calendar year in Spain, or risk forfeiting their

citizenship documents (Lobel 2015). Further, CIPs are not only attractive to countries who may

be struggling, as was the case with Comoros discussed earlier. Post-industrial, modern nation-

states, such as the United States and Austria, have elected to have some variation of CIP in

place to help attract valuable immigrant groups (Business Investor Immigration 2016;

Henderson 2016; U.S. Citizenship and Immigration Services 2016). Within these systems, instead of a financial donation leading directly to citizenship, it acts as a "point" in the numeric scoring system designed to rate incoming migrants (Walsh 2011). Such scoring allows for the neoliberal values of profit and economic value to be attached to each immigrant, and those who score higher in their assessments—business creators, higher educated applicants, etc.— are more likely to be granted access (Ong 2006; Walsh 2011, 2012). So, even when access to economic capital cannot directly purchase group membership, it can buy credits toward attaining the status.

Despite the variability present in CIPs, one shared thread is that these systems exploit the increasingly influential world scripts that hold citizenship rights should be less based on geography and more on transnational rights regimes. In this sense, CIPs are the most liberal form of modern citizenship since it can free individuals from geographic land lock and allows them to select from the rights and accesses that best suit them. Yet, this freedom of choice is not available to everyone. As previously noted, the high price-tag associated with these programs make them a reality for a select class of individuals. Those who already experience higher rates of local freedom due to their decreased dependencies, stand to gain international movement and increased access to foreign tools. As such, CIPs are not a remedy to Shachar's (2009) concerns surrounding citizenship as an unearned birthright. If anything, these programs further exacerbate issues of inequality by giving the affluent a decided advantage over other social classes.

Table 2: Summary of World Citizenship-by-Investment Programs (CIPs)

Country (Year)	Required Investment	Type of Visa/Document	Summary of Additional Qualifying Requirements
Antigua & Barbuda (2013)	$ 200,000 - $ 300,000	CIP	Contribution to the National Development Fund (NDF), 5 days spent in country during period of 5 years
Australia (2014)	$ 200,000, $ 1.5million, $ 15million AUD	Business Innovation & Investment	Must score at least 65pts during application evaluation to qualify
Austria (n/a)	€ 2 - €10 million	Direct Citizenship	Austrian government must approve of charitable organization receiving donation
Belgium (n/a)	€ 500,000	Investor Visa	Continuous residence fast-tracks naturalization process
Brazil (2012)	$ 65,000	Investor Visa	Must reside in country for at least 18months over 4 years to apply for full citizenship
Bulgaria (2009)	€ 250,000 - € 1 million	Investor Program for Residence & Citizenship	Eligible to apply for full citizenship in 2-5 years, depending on investment
Canada * (2015)	$ 800,000 - $ 1,600,000 CAN	Investor Program	Possess management experience in farming, commercial, or industrial business and plan to employ at least one national in business (depending on investment)
China ** (2012-2015)	$ 10 million HKD	Capital Investment Entrant Scheme	Investment must go toward CIES eligible group
Colombia (n/a)	$ 89,000	TP-7 Visa (Residency Investor)	Real estate investment worth 100, 350, or 650 times the local minimum wage (depending on length of visa)
Cyprus (2013)	€ 2.5 - €5 million	Cyprus Citizenship by Investment Program	Investment must go towards purchase of real estate

Dominica (n/a)	$ 100,000	Dominica Economic Citizenship	An in-person interview must be performed, in addition to monetary investment and application
Ecuador (2013)	$ 30,000	Visa 9-II	Investment must be in made in agriculture or export commerce industries
France ^	n/a	Investment Type Visa	Make a qualifying investment in a French business
Germany (2009-2012)	€ 250,000	n/a	Investment must go toward a German company and create at least 10 jobs
Greece (2013)	€ 250,000	Law 4146/2013	Investment must go towards real estate
Hungary (2013)	€ 300,000	Residency Bond Program	Investment in Hungarian government bonds
India ^	$ 1.5 Million	n/a	Investments totaling between 100-250 million Rupees over 3 years and create 20 Indian jobs
Iran ^	n/a	n/a	n/a
Ireland (2012)	€ 450,000 - 950000	Immigrant Investor Programme	Investment in government hybrid bonds and personal real estate
Italy (2014)	€ 300,000	Golden Visa	Engage local chamber of commerce approved self-employment entrepreneurial activity
Latvia (2010)	€ 250,000	Residency Visa	Investment in Latvian company, real estate purchase, or bank deposits (as outlined in policy)
Lithuania (2014)	$ 19,000	Investment Visa	Start company with minimum capital start-up of $19,000
Malaysia (2010)	$ 32,700 - $ 327,000	MM2H	Investment in real estate

Malta (2014)	€ 150,000 - € 650,000	Individual Investment Programme	Investment in property, bonds, and/or the local economy
Mexico (n/a)	$ 86,000	Investment Visa	Unspecified business investment
Netherlands (2013)	€ 1.25 Million	Golden Visa	Investment in Dutch business
New Zealand (n/a)	$ 1.5 -$ 10 Million NZD	Investor 2 Category	Investment must be made over a 4-year period
Nicaragua (n/a)	$60,000	Pension Visa	Investment must be made to a Nicaraguan charity or go towards a local business start-up
Panama (n/a)	$ 40,000 - $ 150,000	Reforestation or Person of Means	Investment toward reforestation program or to create local business to employ at least 3 Panamanians
Paraguay (2012)	$ 8,576 - $ 25,729	Sistema Unificado de Apertura y Cierre de Empresas	Investment towards starting a business in the country
Philippines (2006)	$ 72,000	Special Investors Residence Visa	Investments must be made via a nationally accredited depository bank
Portugal (2012)	€ 500,000 LLLLLLLL	Residency Visa	Investment must go towards real estate purchase and/or a business that creates at least 10 jobs
Singapore (2012)	$ 2.5 million SD	Global Investor Programme	Invest in an existing business or fund a new local company
South Africa (2014)	5,000,000 ZAR	Business Visa	Investment must go towards a business where at least 60% of staff are South Africans

South Korea (n/a)	$ 5 Million	D8 Visa	Invest in business start-up
Spain (2013)	€ 500,000 - € 1 million	Residency Visa	Invest in Spanish real estate, buying shares in local businesses, or national bank deposits
St. Kitts & Nevis (1984)	$ 250,000 - $ 400,000	CIP	Investment must be in real estate or charitable donation
Switzerland (n/a)	$ 250,000	Immigrant Investor Program	Investment must go towards a business start-up that will employ Swiss citizens
Thailand (2014)	10 Million THB	Investor Visa	Invest in government bonds or a condominium unit
UAE (n/a)	10,000 - 20,000 AED	Investor Visa	Business investment
United Kingdom (2008)	£ 50,000 - £1 million	UK Tier 1 (Investor Visa)	Invest in a government approved industry
United States (1990)	$500,000	EB-5	Invest in US businesses that will produce at least 10 local jobs per investor

*CIP only available in Quebec.
**Policy in place in Hong Kong prior to UK withdrawal.
^Policy is in development

Buying Your Way to Freedom

The results of this research suggest that while adoption of liberal citizenship policies is on the rise, they are not uniformly adopted at present. What factors may be influencing those who are making such decisions? First, and as outlined earlier in the chapter, a country's political regime plays a role in policy. Generally, within authoritarian nations, public discussion of policy is closed, thereby giving the leader independence to form policy in an environment free from backlash. In addition, scholars associate liberal citizenship norms with non-authoritarian regime, and expect to see democracy and liberal norms paired with one another frequently (Hampshire 2013; Joppke 1998; Spiro 2008). Second, a country's distinct history has an influence on its policy adoption. Whether the country has broken away from a former colonial power (Bendix 1977) or been formed by the influx of immigrant groups (Bloemraad 2005) affects future relationships with immigrant groups. While countries founded on immigration may be more likely to welcome new (potential) citizens, those who had dealt with forced occupations may be more likely to seek a single ethnocultural state.

Third, modern views of immigrant groups influence policy makers, and this relationship goes two different ways. It, first, is a behavior transmitted to the masses from influential individuals in that they can access the means of communication and make their beliefs known—via interviews, press releases, etc. Conversely, the masses can also influence policy by calling for those in power to augment policy or to focus on a specific issue. As such, the modern view of immigrants is subject to not only affect how elites dictate discussions about them, but can also be driven by mass opinions on such groups. Finally, I posit that a country's connections to other nations play a role in policy adoption. Activity in any international forum increases

contact between states, and thereby the exchange of ideas (Rogers 2003). Further, these

interactions are more likely to result in policy adoption by subordinate countries if influential

states are using the ideas, institutions, and structures (Meyer & Rowan 1983).

Prior to further elucidating these four areas of influence in policy adoption, one should

remember the fundamental processes outlined within world society theory for policy

transmission. These scripts—whether they be about citizenship, educational, or financial

policies—are exposed to states via their acceptance by other actors. Therefore, the more states

that enact a given institution or rule, the more legitimacy it gains. As the levels of legitimacy

surrounding a process increase, it also gains authority as a greater number of states adopt it.

Finally, in this work, states are seen to adopt policies via the isomorphic mechanisms (coercive

and mimetic) described by DiMaggio & Powell (1983).

A recent study (Mirilovic 2015) adds quantitative support to my qualitative findings and

sheds light into the mechanisms at play here. The results of the study found that authoritarian

and non-authoritarian regimes were more likely to accept dual citizenship due to differing

levels of emigration, and what that emigration population looked like. Generally speaking, high

levels of emigration were indicative of a higher likelihood to enact dual citizenship policies

among non-authoritarian regimes, while authoritarian regimes experiencing high levels of

emigration were less likely to embrace such policies. These results were still supported when

considering the educational levels of the emigrant population. Losing highly educated citizens

motivated non-authoritarian states to enact dual citizenship, thereby keeping those individuals

enmeshed in the national landscape.

While Mirilovic's (2015) findings effectively highlight the statistical effects of political regime, diaspora population, remittances, and emigrant demographics on policy adoption, it lacks in-depth discussion of other external factors that may not be measureable using quantitative methods. While his analysis includes a variable considering the historical status of a country (former colony or not), it would be difficult to quantify how a country developed its citizenship policies. Did it follow the Marshallian timeline or did the country "skip ahead" to consider universal human rights prior to establishing civil rights? Did the country in question "evolve" as Marshall's process suggests? Further, there is no consideration of the popular feelings towards immigrants. As previously noted, and as will be discussed in greater length next chapter, popular opinion about immigrants has a significant influence on who is deemed a "worthy" immigrant group, and which is excluded. It is within these numeric blind spots that I seat my policy influence processes. The qualitative evidence adds credence to the quantitative claims, and vice-versa, thereby creating a more holistic view of the policy adoption process.

The second factor influencing citizenship policy adoption is based in the local historical context. A country's relationship with and conceptions of citizenship guide local understandings of the status. Within the Marshallian process, modern citizenship is something that arose in Western Europe at the end of the feudal era (Bendix 1977; Marshall & Bottomore 1992). The French Revolution provided the groundwork for the modern Western understanding of *citizen*, where an electorate could be trusted to guide their country's future via free elections, and receive legal protections from state action (Brubaker 1992). Instead of the populous being labeled *subjects* and existing at the whim of the elite, citizenship attempted to extend rights across the group with a goal of increasing freedom.

Simultaneously, the concept of the nation-state was gaining ground. Instead of lands being divided into fiefdoms, states developed as sovereign regions under the control of identifiable leadership. Geographic boundaries gave distinct borders to a state's reach, thereby allowing for a simple delineation between "us" and "them." Further, within states, citizens were now allowed, given their new citizenship statuses, to push for expanded rights coverage. Benhabib (2005), channeling Kant, suggests that sovereignty is dependent on society, while the republican form of constitution provided the blueprint for future national documents. Further, the logistics of the nation-state and definitions surrounding who received rights, procedures for crossing borders, and expectations from neighboring regions were all developed during this period. During colonialism, these conceptions of the nation-state and citizenship were transferred to an empire's colonies. Ramirez and Meyer (1998) note that these scripts were "aggressively exported" (60), instead of selectively copied via isomorphism. Therefore, Western definitions of "citizen" and "nation-state" were forced on other, non-Western, regions. Adherence to these scripts was required, regardless of the prior cultural and social mechanisms in place.

Such aggressive export of norms to a region could produce a myriad of local responses, but for our purposes generalities should be the focus. Cases arise where the receiving country, or colony, adopt the system and it is kept in place after the region gains independence. One sees these sorts of outcomes in various post-colonial settings where naturalization processes adhere to the world script—such as Gabon (French), South Africa (Dutch and British), and Chile (Spain). However, the reverse is also true. The GCC countries are prime examples where their historical existences as colonies—primarily British—or parts of the Ottoman Empire created

citizenship norms running counter to the prevailing scripts. This regional cleavage will be the topic of next chapter.

The third area of concern is immigrants' status. As noted earlier in this work, the conceptualization of the "other" affects how group members view them. If immigrants are viewed as hard working and valued members of society, the public and officials may be more likely to support inclusive citizenship policies (Joppke 2010). However, if the immigrants in question are viewed as flawed, stricter policies may be employed. What is true, in both the adoption and rejection of such policies, is that perception matters.

My findings support others (Aktürk 2012; Joppke 2003, 2005; Sassen 1999; Sejersen 2008) who have suggested that views on ethnicity play a significant role. Germany's, the UAE's, and Afghanistan's restrictive naturalization laws emphasizing membership in the dominant ethnic group harkens back to a group's concern over "the other." A fear over other ethnicities somehow polluting the whole can drive policy decisions to select one group over another, or to bar non-native ethnicities completely (Aktürk 2012; Appadurai 2006; Brand 2006; Brubaker 1992). Allowing a small number of "outsiders" into the fold could cause the whole nation to become tainted, thereby fundamentally changing who "we" are (Douglas 1994). Notions that ethnicity acts as a foundational element of the nation can mean that groups are less likely to accept outsiders.

Finally, a country's status on the world-stage and relationships to other nation-states is at play. As world society theory suggests, one expects heavily integrated countries to be exposed to world scripts at higher rates than unincorporated states (Meyer 2010). Further, these scripts gain legitimacy and authority through their repetition, thereby aiding to their

influence. Influential individuals can act within the freedoms of their bureaucratic station. As such, if their title and responsibilities grant them the space to decide, it can be made. If they are unable to enact policy alone, perhaps they could become influential in the process.

But what does one make of scholars' (Isin 2000; Moeller 2006; among others) claims that the state is withering? If world scripts hold such great influence and there are indications that liberal citizenship norms based in universal human rights are becoming the norm, is the state destined to die? At this stage in history, I would assert that while there has been, indeed, a change in our formulations of citizenship, both it, and the nation-state, are on firm footing. Instead of a rusted and broken iron cage of bureaucracy, what exists is a remodeled one that considers our increased mobility and global connections. However, despite these new confines, humanity must still contend with our "old problems" of unequal opportunity and economic freedom; and, oftentimes, rely on the state to remedy them. Until there are IGOs and INGOs possessing the authority to enforce global rights regimes, there is little other choice.

Chapter 6
The Case of the Gulf Cooperation Council

In previous chapters, the transmission of the liberal norms of citizenship have been examined. As I have outlined, the acceptance, or non-adoption, of world scripts is based on an expanded system of geographic and cultural factors that unequally affect decision making actors. The first factor influencing the state's decision to adopt liberal citizenship policies to consider, as I mentioned earlier, is the type of political regime in power. The quantitative data of Mirilovic's work (2015) and my qualitative findings, with some important caveats, support this statement. While non-authoritarian regimes are more likely to adopt inclusive naturalization and dual citizenship policies, Mirilovic (2015) notes that the size and education level of the emigrant group in question can have significant effects on a country's dual citizenship policy. While I agree that a country's diaspora, relationship with immigrant populations, and political regime affect dual policy adoption, I add to his conclusion by including substantive factors—local history, national economy, and views held towards outsiders—that have not been included in similar studies and that may be hard to measure with traditional quantitative methods.

The second possible factor to consider, is the history of the region. In the broader cases highlighted in the last two chapters, a nation-state's history can lead to governments adopting dual citizenship policies based on their understandings of citizens' rights, role of the nation-state in providing such rights, and historical status. Third, views of the "other" must be considered. If influential actors view immigrant populations as fundamentally different from the general population, policies calling for equal treatment are likely to fall on deaf ears.

Further, if the general population views immigrants as "less-than," they will be less likely to pressure political actors to adopt liberal citizenship policies. Finally, the fourth factor influencing policy adoption considers international connectivity. World scripts pass more easily between countries if they are in frequent contact with international bodies or other countries; thus, highly enmeshed countries are more likely to have frequent contact with predominant norms, and have more reason to adopt them, when compared to more independent nations.

While it is beyond the scope of this work to measure the direct influence of each of the previous factors' influences on national policy adoption, I present a case where a series of countries that are active in the international economy have eschewed liberal citizenship norms, subscribing exclusively to the ascriptive forms of blood and soil: the GCC. After providing a brief history of the GCC and its membership, I will discuss how the countries' authoritarian autonomy, ideological disagreements based in the nation-state and local history, economic status, and views on guestworkers have affected the region. Within these characteristics, one can observe a group of countries that have shown strength in their resolve by standing against the scripts of liberal citizenship norms. However, this stand has created significant economic and social issues surrounding citizenship and human rights for populations of workers.

A final introductory note must address prior issues found in many Western-based evaluations of Middle Eastern countries. Western researchers have, historically, treated the Middle East as a cultural and political monolith (Said 1993, 1994; Sick 1994; Vogel 1994). Too frequently, the subtleties of local variation were lost in efforts to exoticize a, seemingly "homogenous" people. "Middle Easterners" were so disparate from "Westerners" that there was no way they could ever understand one another, fully, let alone account for the variety of

histories present in the distant region. Further, as these attitudes took hold, not only in

academia but also in various other cultural items—such as literature, art, and theater—, a

chasm opened between the West and Middle East, creating an absolute boundary between

those deemed "Western" and everyone else (Said 1993). As Edward Said (1993) noted,

imperialism and colonization created "different species" (p.108) who required different

treatments; the colonizer to rule, and the colonized to serve.

Westerners justified this taxonomic evolution by stressing an inherent dominance in

their history. The Industrial Revolution had modernized Europe, and countries that had not

undergone a similar process, were viewed as "backwards" due to their differing beliefs. Further,

the fruits of the Revolution became justification for marginalization. Noting the self-

aggrandizing echo chamber of many Western powers, Said (1993) posited that in such thinking:

> There is an impressive circularity here: we are dominant because we have the power (industrial, technological, military, moral), and they don't, because of which they are *not* dominant; they are inferior, we are superior…and so on and so on. (p.106)

As such, non-Western or preindustrial groups were seen as missing some basic characteristics

to make them "like us," and since these things were lacking, they will never be our equals.

Thankfully, modern scholarship considering the development of the nation-state,

applicability of democracy, and citizens' rights in the Middle East have sought to chip-away at

such generalities and stereotypes. Instead of Middle Eastern countries failing to adopt

democracy due to some inherent cultural incompatibility, non-adoption became a product of

regional history (Sisk 1992). A more holistic approach was adopted that required researchers to

account for history and culture in their analyses, not only the economic and political basis for

implementation. This research is seated within such a holistic vein. While the data and findings

in the following pages can only be applied to the GCC countries, it tries to consider citizenship

script adoption from all angles.

Characteristics and Composition of the GCC

Figure 5: Map of GCC Member Countries

The founding documents for the establishment of the GCC were authored over

approximately three months in 1981 after numerous discussions between officials dating back

to the late 1970s. Representatives of the six participating countries—Bahrain, Kuwait, Oman,

Qatar, the KSA, and the UAE—signed the agreement on May 26, 1981 (Nakhleh 1986; Ramazani

1988). While the basis for the agreement was in the religious, social, economic, and

demographic similarities among the nations, there is some disagreement on the official reasons

for founding the Council (Nakhleh 1986). Experts supporting the Council's founding at the time

noted that its incorporation would accomplish a long-held desire of a united Gulf region, based

on cultural and historical similarities (Ayubi 1995; Nakhleh 1986). However, others more

skeptical of the Council's goals have viewed it as a response to ongoing contention between

neighboring Iran and Iraq, thus creating a degree of national security for the members. Within

this skepticism have been claims that the GCC would be a Middle East-based, armed wing of the

North Atlantic Treaty Organization (NATO). This meant that the alliance would be a tool to

accomplish US goals in the region (including increased access to oil), and that it would act as the

"stalking horse of Saudi Arabia" (Ramazani 1988:2), making it an instrument to be used in some

sort of future military conquest.

Despite experts' disagreements on reasons for the GCC's founding, national

representatives who signed the founding declaration cited four main assumptions about the

region as justification for the coalition: the existence of a naturally ongoing cooperation of the

member nations, presenting a united front to protect their region's interests, maintaining an

autonomous zone and preventing foreign influence, and a belief that peace in the Middle East

could only be attained with a "just" resolution of the Palestinian conflict, which included the

formation of an independent Palestinian state (Nakhleh 1986). However, despite the Council's

aversion to outside influence, Vora (2013) notes how these countries are rentier states,

garnering most of their national income from the renting of land to foreign investors.

Due to the GCC's emphasis on attracting foreign investment and interest in expanding

the local economies, member countries have formed a dependence on foreign workers.

Workers are needed to not only fill low-skill jobs (e.g. manual labor or service positions), but

also to manage these groups once they're within the country. The opportunity for work and

existing social networks in the receiving country, have convinced large numbers of migrants to

come to the Gulf region. While numerous countries and regions have experienced similar flows

of migrants during times of economic boom or local strife—be it famine, war, or oppression—

the demography of the GCC is interesting and creates a unique study. As outlined in Table 3,

below, in the period between 2010 and 2014, only two member GCC nations had more than 50-

percent of their total populations registered as nationals: Oman and the KSA. Considering the

entire Council, nationals make up a slim numeric majority of the region's population (52-

percent) (GLMM 2014).

Table 3: Total population and percentage of nationals and non-nationals in GCC countries. (reproduced from GLMM 2014)

Country	date/period	Total population	% in total population	
			Nationals	**Non-Nationals**
Bahrain (1)	June 2011	**1,195,020**	48.9	51.1
Kuwait (2)	End October 2014	**4,079,698**	31.5	68.9
Oman (3)	mid-2014	**3,992,893**	56.6	43.4
Qatar (4)	April 2010	**1,699,435**	14.3	85.7
Saudi Arabia (5)	mid-2013	**29,994,272**	67.6	32.4
United Arab Emirates (6)	mid-2010	**8,264,070**	11.5	88.5
Total*		**49,225,388**	**52.0**	**48.0**

* Provides the sum of population numbers at different dates between April 2010 and October 2014. It is representative of the combined total population at all the listed dates.

Given the observed multinational demography of the Council and its dependence on

foreign investment, it would stand to reason that they would employ more liberal approaches

to citizenship. However, the opposite appears to be occurring, where very few individuals meet

the basic criteria to apply for naturalization. In addition, some of those in power—for example

Sheikh Mohammed of the UAE—do not see a link between an internationally integrated

economy, or status as a global city as a threat to its national identity (Vora 2013). Following this

thinking, a country could be made up of any number of different groups, as long as a homogenous and exclusive dominant group remains in power.

GCC countries not only share similar demographic statistics, but also hold similar ratings in the 2015 *Democracy Index* (*The Economist* 2016). All six countries are classified as authoritarian states, placing them in the most restrictive third of the list. As noted in Chapter 3, within the *Democracy Index*'s system, authoritarian regimes are those which place obstructions in press reporting with many media outlets being state controlled, if elections are held they are not free with candidates representing a single party, and public protest is barred. As such, GCC countries are governed via autocratic rule, and foreign watch-dog groups voice significant concerns regarding the various countries' human rights records (Human Rights Watch 2006, 2015; Human Rights Watch & Varia 2008). While much of the focus has been placed on the UAE's troubled record with guestworkers, given the country's status as a world economic center (Abdi 2015; Kanna 2011), the treatment of foreign workers should be a regional concern as foreign workers drive a variety of industries. Further, the region's political stance suggests that the countries are more likely to resist dual citizenship, as a sign of liberal citizenship. The qualitative results are echoed by Mirilovic's (2015) quantitative findings that authoritarian countries that experience high numbers of low-skilled foreign immigrants are less likely to adopt dual citizenship. Thus, the first aspect of script adoption—type of political regime—favors ascriptive citizenship norms, in this case.

However, before delving deeper into the human rights records of GCC countries, one must first discuss the basis of treatment: the citizenship laws in the region.

Ascriptive Dominance

Lending support to the "authoritarian-ascriptive norms" argument are the citizenship laws in place in the region. As the GCC, itself, was founded based on national similarities, the general citizenship processes for the member countries are very similar, thereby allowing me to make some generalizations. Each country uses a *jus sanguinis* approach to citizenship transmission. Within this system, national membership is passed to an individual via the patrilineal line. The patriarchal nature of citizenship is further illustrated in the Kuwaiti citizenship law, as it states that "Any person born in, or outside, Kuwait whose father is a Kuwaiti national shall be a Kuwaiti national himself" (Kuwait 1959). Citizenship is only inherited from one's mother if the identity of their father is unknown. While this caveat is present in other national citizenship laws, such as the Egyptian case presented in Chapter 4, Tétreault (2000) has suggested that this rule is a holdover from Islamic law. Within this legal realm, one's status is directly tied to their rights, with different statuses ascribed to someone who is married, divorced, or their spouse has died. The KSA articles surrounding spousal citizenship show a loosening within this claim, noting:

> If an individual lost his Saudi Citizenship, the following terms apply to his wife and children:
>
> a- Wife of the individual who have lost his Saudi Citizenship according to the Article (13) [acquiring foreign citizenship without permission, working with foreign government or military without permission, taking a role against the Kingdom during armed conflict, or refusing to quit a foreign post] have the right whether to follow her husband's new nationality or to keep her Saudi Nationality, and she has the right to recover her Saudi Citizenship in case of divorce. However, children residing outside the Kingdom have the right to acquire the Saudi Citizenship when they reached the legal age.
>
> b- If an individual lost his Saudi Citizenship according to the Article (11) [acquiring foreign citizenship without permission], his wife and children will not lose their Saudi Citizenship as a result. (Saudi Arabia 1953)

As such, girls are born into the status of their fathers, but married women's statuses, at least in the KSA's case, provide a modicum of liberalization if her husband has been found to be in violation of national law.

Bolstering the regional preference toward ascriptive norms, naturalization processes—the second indicator of liberal citizenship norms—have been restricted. GCC countries limit who can apply for citizenship due to ethnocultural factors, thereby creating monoethnic states (Aktürk 2012), like the Egyptian and German examples from Chapter 4. Oman's Royal Decree addressing citizenship (Oman 2014) provides a useful example of this limiting process. While the ethnic basis of citizenship is not overt, in this case, language and cultural assimilation processes are present in Article 15 of the law:

> 1. He should have resided in Oman for at least 20 continuous years, or 15 years if married to an Omani woman provided that their marriage shall have taken place after obtaining approval of the Ministry of Interior…and he shall have a son from his Omani wife.
> 2. Fluency in Arabic…
> 6. Written consent to relinquish current nationality and proof of such (Oman 2014)

The extended period of residency required prior to applying for naturalization assures that approved candidates have become accustomed to Oman's culture. Further, the common language requirement is present to aid in one's incorporation into the imagined community. Despite the link to local culture being downplayed in the updated law above, the 1983 law highlights the importance of one's ethnicity that continues in the country. During the process of acquiring citizenship, applicants must publicly state that "I swear by Almighty God to be loyal to the Sultante [sic] of Oman and to respect the laws, costumes, traditions, and be a good citizen as God is my witness" (Oman 2010).

While Oman's updated citizenship law provides an example of limited reliance on

ethnicity as a component of naturalization, Kuwait's naturalization policy provides explicit

ethnic requirements surrounding the acquisition of citizenship. Point five in Article 4 states that

citizenship applicants:

> …be an original Muslim by birth, or that he has converted to Islam according to the prescribed rules
> and procedures and that a period of at least 5 years has passed since he embraced Islam before the
> grant of naturalization. Nationality thus acquired is ipso facto lost and the Decree of naturalization
> rendered void ab initio if the naturalized person expressly renounces Islam or if he behaves in such a
> manner as clearly indicates his intention to abandon Islam. In any such case, the nationality of any
> dependant [sic] of the apostate who had acquired it upon the naturalization of the apostate is also
> rendered void. (Kuwait 1959)

Religion, here, is inextricably tied to citizenship. To be Kuwaiti, one must be Muslim and follow

the tents of Islam. Further, if someone renounces Islam, they also effectively renounce their

citizenship. Individuals cannot be one without the other.

Despite the naturalization processes employed by GCC countries showing signs of a

liberalization of citizenship, they are in an inchoate form. The ascriptive norms of citizenship,

based in one's bloodline, are the dominant script in the region, and while naturalization is an

option, it is not an opportunity that is accessible by all. This limiting of access is evident in the

universal prohibition of dual citizenship in the GCC. Homogenously worded statements to the

following examples of dual citizenship's illegality are found across the region. Article 15, point C

in UAE Federal Law of 1972—which is still the "law of the land"—notes that a citizen can have

his status revoked, "If he has adopted, voluntarily, a nationality of another country" (UAE

1972:5). Qatar's law supports the "single nationality" policy noting that an individual can lose

their nationality if he or she "Acquires the nationality of another country" (Qatar 2005:3).

Within these ascriptive systems, one can only hold allegiance to a single state, thereby limiting

outsiders' access to each country's bundle of rights. Further, as highlighted in this piece's

opening vignettes of Nour Miyati and the *bidoon* in the UAE, legal classification can significantly

affect how one navigates their daily lives. Citizens can gain the benefits of institutional

protection from the state's legal and judicial systems, whereas non-citizens may risk

deportation for seeking help. This difference puts non-nationals in precarious positions where

their well-being could be dependent on their status.

A More Complete Picture of the GCC

While the previous section outlines the relationship between political regime and liberal

norms in the GCC, the legal examples provided use a language of exclusion which hint at other

mechanisms at play. As such, it would be reductionist to assume that the GCC countries reject

the liberal citizenship model and human rights based citizenship purely based on authoritarian

power. While despots wield significant power in their homelands, they are not invincible, as the

Arab Spring and other uprisings have shown. Instead, I posit that the regional interpretation of

citizen and group membership are housed in the local histories, economies, and popular views

toward non-nationals. The influences of these variables allow us to locate the regional rejection

of popular world citizenship scripts, and see the justifications into why this occurs. Despite the

council's almost 40-year existence, it cannot explain the development of a semi-ubiquitous

cultural belief systems in the region. It is within the regional developments before the GCC's

founding—located in religion, socioeconomic situations, and popular views—where one can

find a more complete explanation.

A basis for many scholarly debates concerning liberalism in the Middle East lies in an

examination of Islam and democracy. The Middle East, itself, is dominated by authoritarian-

republican regimes that justify their places via the Western concept of divine right (Mernissi 1992; Sisk 1992). Telhami (2013) suggests that the prevalence and general acceptance of authoritarian regimes by Arab groups is because they

> have never fully divorced the authoritarianism of their rulers from the Western-dominated international order that they see as having cultivated and entrenched these rulers in power from the very inception of the modern political system in the Arab world at the end of World War I. (p.19)

As such, authoritarianism is a direct link from the colonial past of these countries. Further, the bubble vacated by the abrupt end of colonization allowed for authoritarian leaders to come to power. They were supported by the most organized groups, so they were the first to fill the gap (Hudson 1977).

From these authoritarian ties, the Middle East has been painted as a landscape intolerant to democracy, and simultaneously at odds with it (Said 1993; Sick 1994). As Sisk (1992) notes, the modern Islamist's view of God's will as sovereign can help explain this perceived friction. Within a democratic system, the people are the mechanisms of government. The will of the people is heard and applied via elections, public discourse, and the like. Instead, within the modern Islamist system, God is sovereign, and as such, humans cannot question His will. Further, democracy could only be achieved by adhering to the "shari'a paradigm" (Sisk 1992:23). While popular outcries against socioeconomic problems are not unheard of in the Middle East, powerful individuals have used cultural uncertainty and specific interpretations of the Koran to maintain their positions.

This argument of "God's will" as justification for a political regime's existence has been weaponized by the ruling elite. In creating an unbridgeable gap between the Middle East and West, leaders created literal and figurative boundaries from the unknown. Within the regional

concept of the *hudud*, boundaries are solidly designed objects intended to be comforting and

protecting to those feeling fear (Mernissi 1992). By regulating who could enter or exit an area,

visit a city, or do business in a region, boundaries helped minimize intergroup conflicts; gaining

their legitimacy via Koranic passages (Mernissi 1992). Anything outside of the borders,

particularly those areas to the West, took on the symbolic embodiment of fear and fright.

"*Gharb*, the Arabic word for the West, is also the place of darkness and the incomprehensible,

always frightening. Everything we don't understand is frightening" (Mernissi 1992:13). While

this quote is in direct conversation with how the Middle East views the West, it also applies to

the West while looking East. Uncertainty breeds fear, fear could lead to generalizations and

footholds for those wishing to gain power. Group unity, then, helped reduce uncertainty.

Thereby, the darkness of the West could be used as justification for eschewing the ideas

originating there. Further, differences can be used, from a functionalist perspective, to bring us

together. Charismatic leaders know this, and can base their successes off it. Legitimacy is

gained through the effective wielding of ideas. As such, elites in the Middle East have used

religious doctrine, uncertainty, and "otherness" to maintain their positions, as have Western

elites. Within the case of the GCC and rest of the Middle East, the difference between East and

West has fueled differing interpretations of how society should be run.

In addition to the reliance on religion as a social adhesive, discussed above, ideologies

can be used a mechanism of resistance. Consider the Western concepts of modernity and

modernization. The philosophical underpinnings of modernity are found in the humanist basis

of Western Enlightenment thinking (Mernissi 1992; Said 1993). The rise of individualism was

predicted to take place concurrent with the declining influence of religion. As such, the rights of

the individual were to take center stage. This process, now, sees the rise of universal human rights regimes. Gone are the tribal specifics of individual nations, as states now turn to an all-encompassing, universal form of citizen.

However, in the GCC's case, this process has not occurred. According to Mernissi (1992), the rise of individual responsibility—via democracy, rights regimes, etc.—frightens the elites in the Middle East. Personal opinions are seen to "always bring violence" (Mernissi 1992:19) as it indicates group-level disharmony. Disagreeing factions are harder to control. To prevent this sort of breakdown, regional elites highlighted the primordial nature of differences between groups, as noted above, but also restricted access to the ideas modernism was based in (Hudson 1977). However, to placate citizens, they were allowed access to certain benefits of modernization via selective modernity (Mernissi 1992; Sisk 1992). Individuals can buy and use modern consumer goods (TVs, cellphones, automobiles) without adopting the ideologies from the countries that produced them (Ibrahim 1982). While modernist ideas may be largely absent from the region, the products of modernization are widely available and easily adopted.

What has taken hold in the place of modernism are some regionally based ideologies intended to bring groups together. Intended to minimize interstate skirmishes and, ultimately, culminate with the founding of a single Arab state, Pan-Arabism sought to emphasize ethnicity over nationality or geography (Ayubi 1995; Telhami 2013). While a laudable goal, the plan was cast aside as regional differences came to dominate any discussions about unification (Ayubi 1995). The GCC can be thought of not as an extension of the Pan-Arabist push, but as an agreement based on necessity. As noted above, the GCC countries founded their allegiance in shared cultural, economic, and social characteristics. Of note is the shared oil wealth found in

each country, as these discoveries created the severe inequities between nationals and non-nationals, as has been shown throughout this work.

The national economies of GCC members are run based on landownership and granting foreign companies paid access to those areas and resources. Referred to as rentier states, these economies are characterized by not only relying on "substantial *external* rent," (Beblawi 1987:51) but in situations where rental agreements predominate; a limited number of individuals or groups generate the rent, with most individuals involved in the distribution of it, and the government is the primary recipient of the money from rents (Beblawi 1987). This unique economic situation is thought to have been developed in GCC countries during the early to mid-20th century. Kuwait was first to adopt the system in the 1950s, which later spread to Qatar and the UAE. Saudi Arabia had a similar system in place in the 1920s and 1930s centered around series of "land gifts" that were given to individuals and groups that the regime sought favor with (Beblawi 1987).

In the GCC's case, what was being offered by the governments was access to the region's oil reserves. Using a *kafil*, or sponsor, land deals were struck where laborers, storage and transportation of crude, and security were established. As such, *kafils* made themselves indispensable in these deals since they could bridge the uncertainties between the local and foreign groups and arrange for the proper travel documents to be completed (Ibrahim 1982). Without access to a local sponsor, many visas requests were likely to be rejected since most of the region's countries were—and are—unlikely to grant tourist visas (Ibrahim 1982).

Despite deals being in place for land access and shipping, a significant resource was missing: workers. To minimize costs, *kafils* began to act as recruiters and managers of workers.

Given the high demand for the region's oil, companies were unable to locate enough workers

to staff their operations. Further, many of the local workers who were available were not

trained to manage the business (Abdi 2015). Given these constraints, the GCC began to recruit

laborers to fill these vacancies; giving birth to the modern guestworker status. Many sponsors

confiscated legal documents as part of the hiring process, essentially holding workers in

temporary slavery until their contract was complete, a tactic that remains until today (Ibrahim

1982).

While such an overtly exploitative situation seems unethical and institutionally

troublesome, the *kafil*s' existence has been supported in two significant ways. First, they have

the support of the local governments. As shown with domestic guestworkers, contracted

workers have little recourse if they are being swindled by unethical sponsors. Further, sponsors

have little legal motivation to treat workers humanely. National laws and regulations support

the sponsors' actions as they are doing a significant service for the government (Beblawi 1987;

Ibrahim 1982).

Second, given the institutional support of sponsorship practices and virtually assured

profitability of the rentier state, the beneficiaries of the system begin to see themselves as

fundamentally different from the scores of workers. A "rentier mentality" (Beblawi 1987:52),

develops due to a breakdown between the reward-causation relationship in work. Instead of

the financial rewards of work being dependent on the amount of risk an individual takes on, the

rewards are doled out based on situation. As such, groups that are entitled to the financial

profits from a deal see themselves as deserving, even if their only "contribution" was being

born into that position. While superficially minor, this mental splitting between deserving and

non-deserving groups can lead to justifying different treatment. Guestworkers and other non-national groups were not born into citizenship, so their having to perform labor is an indicator of group membership. Citizens garner the benefits of the rent relationships in a variety of forms, including payments, access to interest free loans, and access to state sponsored institutions (Longva 2000). While the national economy depends on the work of non-nationals, they are not granted access to the fruits of that labor, purely based on citizenship status.

Further, the GCC's reliance on foreign workers has caused some problems aside from the accusations of worker abuse outlined throughout this piece. As previously shown, when the rentier economy was established, it required large populations of workers that were recruited from outside national borders. While that policy worked well to get the number of hands needed to fill the staffing needs of invested companies, the reliance on these workers has kept many nationals out of the job market. As a result, some GCC countries are developing programs to increase the numbers of national workers in the workplace, thereby making them less reliant on the benefits associated with the rentier system. One notable example can be found in the Saudi Nitaqat program that was implemented in 2011 to incentivize the hiring of Saudi nationals by Saudi-based companies (Sadi 2013). The plan was largely supported by ICT investors and used e-tools to track workers, with a goal to marry the needs of the government's desire to track where workers were and the people who were looking for gainful employment. However, the program has run into logistical roadblocks that revolve around the national economy's dependence on foreign labor and the government's desire to provide more jobs for nationals.

The program uses a four-classification color-coded system according to how many

Saudis the companies employ. Each color (high to low: platinum, green, yellow, and red) is awarded according to the field (or activity) the company is involved in (e.g. wholesale and retail trade) and size of the company, with higher rankings going to those companies whose workforce is composed of a larger percentage of Saudi nationals. However, the smallest companies (1-9 employees) are exempt from the Nitaqat coding system, but are legally required to have at least 1 Saudi national (Massoud 2013).

The hiring of marginalized groups (such as disabled job seekers) is incentivized within the current system. For example, the hiring of a disabled Saudi male or female counts "as four people in the nationalization equation" (Massoud 2013:2), thus providing greater incentives to include these individuals in the workforce. However, within the program, hiring students is penalized as they count as 0.5 people in the equation. Ideally, this move encourages the hiring of full-time professionals, as opposed to temporary workers. Linked with the Nitaqat policy's concern over worker inclusion is the importance of wage equity within the field. Any employee earning less than 3,000 Riyals counts as less than one person within the calculation. If they make under 1,500 Riyals, they are excluded from the equation all-together (Massoud 2013).

While the Nitaqat program makes sense when considering the Saudi working force, the situation begs the question: Why should employers bother adhering to the program's guidelines? Further, why should they turn away from relying on guestworkers who will work for less? In short, observing the program's guidelines provides employers with the opportunity to hire additional foreign-born workers (Massoud 2013). If a company earns a green or platinum rating, they can gain access to an expedited online process for renewing foreign employee work permits, adjust foreign employees' professions, and hire foreign workers from red and yellow

rated businesses without receiving the previous employer's approval. Beyond these benefits, there are restrictions to poorer performing businesses. Yellow rated employers are only allowed to renew visas for foreign employees with less than six years of service in the KSA. Further, these employers can only apply for a new visa after the permanent departure of two expatriate workers. Red employers are unable to hire new expatriate workers, renew current work permits, or open new business branches within the KSA until their status improves (Massoud 2013). These restrictions, added to the potential of employees being poached from higher ranking firms is thought to provide an effective motivation to employ nationals as employees.

However, while this system will focus on limiting expatriate employment within the Kingdom and has been running relatively smoothly since its implementation in 2011, it has run into recent roadblocks. In early 2015, the third phase of the program, focusing on the "Saudization" of businesses by drastically increasing the localization quotas of the program was scheduled to be implemented. According to a news report by Mary Sophia (2015), the phase would increase "retail and wholesale firms…quotas from 29 per cent to 44 per cent while other major commercial firms are required to increase the limits from 29 per cent to 66 per cent." This drastic increase drew concern from the Council of Saudi Chambers who requested that the phase be put into practice over "two to three years" (Ghafour 2015) for more qualified job candidates to be created. The lack of suitable national candidates would have a negative effect on Saudi companies as they would be subject to the stipulations outlined in phase three, but unable to find enough quality job candidates to fill the openings (Naffee 2015). Because of these concerns, the phase's start has been delayed for three years.

This delay is particularly beneficial to the construction industry, which employs large numbers of expatriate workers. In a piece outlining the impact of the delay on Saudi firms, an anonymous Indian worker suggested that if the third phase went ahead as scheduled, it would mean that "nearly 50 percent of expatriate workers would have to leave the kingdom" (Naffee 2015), leaving more job openings than there are job seekers.

The Nitaqat example is illustrative of the complex nature surrounding guestworkers and the economies that depend on them. While national policies seek to marginalize the groups, oftentimes denying any path to citizenship, national economies have developed around the availability and need of cheap labor. As such, when efforts to increase the numbers of employed national workers are implemented, they run up against a reality that many national workers may not know how to do the jobs that become available. Further, as many expatriates are employed in positions that many nationals would rather not do—such as sanitation or construction—there is little that can be done to attract "affluent Saudis" to these positions (Sophia 2015). By dismissing various jobs, in general, as "below" one's station, the prominence of the rentier mentality is on display.

Turning to the UAE, one can see how a non-national group can be kept outside of the citizenship process despite making significant contributions to the national culture. Within this intricate relationship between Indian expats, migrants, and guest-workers and UAE nationals is an issue surrounding culture and context, as well as economics. Considering the economic context, Vora (2013) has shown how despite being excluded from the naturalization process, Indians in Dubai have successfully integrated themselves into the national economy. Not only do Indian migrants occupy manual labor positions that one tends to expect from migrant

workers (e.g. construction, housekeeping, etc.), but they have incorporated themselves into more prestigious positions, with individuals becoming successful businessmen and IT workers. Further, the connections between the Indian diaspora in Dubai and the global city, itself, extend beyond the economic realm. Indian sections of the city have been established and Indian cuisine is commonly available (Vora 2013).

Migrant groups have also contributed to the culture of Dubai, as well. Local restaurants cater to the needs of foreign workers by serving items from their homelands (Vora 2013; Vora & Koch 2015) and shops carry custom-printed fabrics that women use to make dresses (Abdi 2015). This cultural integration has become so complete that shopkeepers in the Dubai Gold Market in Deira frequently call to shoppers in their native tongues. This is especially impressive when the shopkeepers use Somali, which has about 10-million speakers worldwide (Abdi 2015).

Yet, within this scope and despite some families living in Dubai for multiple generations, non-nationals in Dubai and the rest of the GCC are "impossible citizens" since they have a significant impact on the region, yet are actively kept outside the status of citizen. To help legitimize this exclusion, the UAE government has delineated various categories of individual as part of the process to implement neoliberal policies in the nation. Among these are citizen, expat, and worker. Citizens experience the greatest amount of economic opportunity in the country, while often garnering the highest paying jobs, despite sometimes being unqualified to fill those roles (Vora 2013). In the UAE, this group is in the extreme numerical minority with only an estimated 10 to 20-percent of all residents being in the category (GLMM 2014; Vora 2013:44). Freedom of residence, length of stay in Dubai, and cross city movement is then increasingly restricted until reaching the lowest rank: workers. Many times, workers reside in

work camps segregated from the city's center. This geography of status is familiar to many of Dubai's residents as they can identify which groups live in which region and, further, what skin colors are welcome where (Vora 2013).

Limits to Inclusion

What the case of the GCC illustrates is the complexities tied to script acceptance. While the Council's members are in close contact with foreign investors via the rentier system, many of whom have adopted liberal citizenship norms, they have still elected to rely on ascriptive norms of membership. While this decision is partly based on the authoritarian political regimes held by the countries, it is not solely on the shoulders of politics. As I have shown, the seeds of exclusivity were sown during the region's colonial past. During this period, tribalism and group membership were used to create safety. Those coming from "other" groups or regions were viewed with suspicion, as is the case of any other geographic region or cultural group. However, this skepticism was effectively harnessed by powerful elites seeking to gain power in the post-colonial era. By highlighting the differences between the West and Middle East, elites could construct a society steeped in religious belief, while avoiding the Enlightenment and humanist thinking which had gained traction in Europe and other parts of the world.

By being able to minimize the influence of an ideologically humanist turn, national leaders could also dictate the language surrounding membership, and who could become "one of us." Citizenship, in these terms, was not based upon a set of universal human rights, as observed in countries that have adopted liberal citizenship norms, but on an indestructible link between ethnic membership and citizenship. Monoethnic states were created using this

rationale, and only those who had come from other similar states, or converted to the dominant ethnic group, could hope to gain access to citizens' rights. After the founding of the rentier system, citizenship also meant access to economic stability. Being a citizen meant that one was entitled to a portion of the money that the government received from providing access to the local resources. Further, citizenship allowed individuals to act as sponsors in other ventures, thereby guaranteeing additional income by acting as a go-between for foreign workers and local companies. The *rentier mentality* was born from this situation. Citizens became viewed as rightful recipients of rights, while non-citizens' exclusion was justified. They have to work because they are different from us.

While the baskets of local rights that GCC citizens access are significant, the rights are only open to a small number of people. The swaths of foreign guestworkers the region relies on are barred from ever gaining citizenship. Despite workers raising families in their adoptive homes, spending their lives working for local companies, and their cultures being integrated into cities' landscapes, they cannot ever be "one of us." Sponsors limit workers' movements by confiscating legal documents, and abuse is tolerated by the authorities. Further, there is little public call to change the existing system. Generally, the citizens are benefitting by keeping non-nationals marginalized and out of the rewards system. Leadership has no cause to change since they are, relatively, immune to criticism or public recourse. Further, the public, many times, cannot sympathize with the workers. "No one puts a gun to the [expatriates'] heads. If they don't like [the working conditions] here, they can go elsewhere" (Kanna 2011:44).

As such, what the case of the GCC shows us is that norm adoption is contingent on the social, economic, and political environment of a place as well as its history and culture. What

ideologies dominate the region? Who is in charge and how did they get there? How does the

local population view the issue at hand? These things come together to help agents evaluate

the applicability of available scripts. While the scripts of liberal citizenship norms may be

prevalent and influential, there is still space for resistance against them, and this resistance

cannot be identified using a single variable. To understand what has happened, one must

consider the whole country or region in its historical and cultural contexts.

Chapter 7
A Rocky Landscape

This work has addressed the question of citizenship in a few different ways. First, it attends to the traditional understanding of citizenship as primarily an exclusive form of membership in a polity. Within this scope, one's status as a member means that one is part of a limited group who has exclusive access to membership benefits available from the state after the Marshallian schema of civil, political, and social rights. The exclusivity of national citizenship is designed via the ascriptive transmission of membership, thus, limiting its availability to those who can be connected through blood or soil. Second, I have also analyzed the emerging forms of citizenship with increasingly plastic membership, including postnational forms, deriving legitimacy from an extension of universal human rights as well as monetary forms based on CIP schemes. The second manner of gaining citizenship rights has transnational origins as opposed to the ones stemming from one's tight coupling with national territory or ancestry.

Instead of solely relying on citizenship as an heirloom to be passed down through generations, the liberalization processes outlined here have shown that citizenship is becoming post- or transnational. No longer do one's ties to a geographic region act as the sole determinant of one's future. Individuals have gained the ability to cast off their birth nationalities for citizenships from other places, as one can, in principle, hold memberships in multiple locales, and some can even go as far as to collect passports to create personal advantages in business and travel. Further, the rights that are tied to each status can be similarly traded. If one's birth-state makes business travel difficult, thereby impeding their career, they can now have options to gain the rights of others and avoid those circumstances.

This ability to pick-and-choose rights and memberships brings me to the final main incarnation of citizenship in this piece: inequity. The differences between the "haves" and "have nots" have been a topic of concern for sociologists, and other social scientists, since the field's inception. Vast bodies of literature have examined how different racial groups experience different social realities, dependent on the educational and socioeconomic opportunities available to them. Those groups with access to the most opportunities had comparatively better chances to "succeed" in life, by getting an education, landing more prestigious jobs, and accessing the wealth that both achievements can yield. Those with little access to the same institutions and choices, may not be as equipped to succeed. For example, they may be forced to shorten their time in school to take on low-paying work to support their family, thereby limiting their access to wealth and the freedoms that come along with it.

While interest in inequality has included inter-state comparisons after the rise of globalization, which saw some countries benefit more than others, one can use these same metrics to consider citizenship. Because not all citizenships are created equal, one's life chances and opportunities are tied to one's ability to access citizenships with higher dividends (Shachar 2009). While inequity persists within the nation-state, one must now consider the differences in rights gained via group membership. The locale of one's birth, and the identification papers they gain at that point, can have a significant impact on whether they can conduct international business deals, access other educational opportunities, avoid persecution, exercise various freedoms, or travel safely across borders in times of distress. Further, being born without those papers can mean that individuals may not be protected by local laws, could be targeted for abuse, or subject to arbitrary expulsion from the state, even if they were born there. As such,

citizenship can act as protection for the individual, but those protections differ according to where someone is and what papers they carry.

However, as citizenship becomes disentangled from the nation-state, as shown by the liberalization of membership. Citizenship has moved away from the exclusivity of strict, birth-based membership, often employing a more inclusive set of norms. The first step in this separation is through the process of naturalization. Through naturalization, individuals born outside of a given state can apply to gain citizenship. Further, this process of formal inclusion also helped extend the goals of republican citizenship: bring more individuals into the imagined community with popular sovereignty (Leydet 2014; Walzer 1989). Once individuals had successfully navigated the requirements to gain group membership, they had access to the rights of the area. Naturalization, then, was a first step in allowing citizenship to become focused on the individual and what their needs and preferences were.

The second important trend in the liberalization of citizenship norms pertains to the increased acceptance of dual citizenship. This study found that dual citizenship policies have been enacted by 131 countries, essentially meaning that 131 countries now allow their citizens to access multiple sets of rights inside and outside the national territory. However, dual citizenship also calls into question what a citizen *should* be. Critics of the process note that individuals cannot hold allegiances to multiple states. By being a legal member of two groups, how are the responsibilities of the individual distributed? What this criticism leads to is a question of trust: How does the state know that they are one of "us?" Many recent political arguments against dual citizenship have taken this tone. In addition to the criticisms leveled at German Chancellor Angela Merkel's call for extending dual citizenship noted in Chapter 4

(Huggler 2016), the status—and those holding it—has been a frequent target of conservative politicians across much of the world. In the United States, the Trump administration's attempted ban on various immigrant groups also sought to ban dual citizenship holders from targeted nations (Seipel 2017). Zimbabwe's Registrar General Tobaiwa Mudede has proposed eliminating dual citizenship from the country's new constitution, citing security concerns (*Chronicle* 2017). Lastly, a Sri Lankan member of parliament lost her seat due to failing to renounce her Swiss citizenship (*Outlook* 2017). What one learns from these cases is that while dual citizenship policies are becoming more common, they are, by no means, universally accepted.

As a final sign of the growing separation between the state and citizenship, a comprehensive list of CIPs was created. What CIPs, effectively, do is allow individuals to purchase access to other sets of rights, thereby gaining the ability to increase the ease of travel between nations, become active in foreign economic markets, and, also, gain social capital among their colleagues and competitors. Within these programs, the increasing inequity of citizenship is fully exposed. No longer does one only need worry about their passport being worth more-or-less than a foreign colleague's, but now, those who can afford the application processes and investments can gain access to completely new sets of rights, giving them substantive advantages over others in the region. Ong's (1999) study of flexible citizens, having access to the most passports can be a symbol of a better businessperson. As such, having more passports than a competitor could equal more lucrative deals, since it is assumed multiple holders have a wider menu of choices. In addition, CIPs also allow countries to expel unwanted populations by buying them documents from other regions, then deporting them to those

locales. As Abrahamian (2015) noted, the *bidoon* in the UAE were stateless people, so the government purchased individuals Comorian citizenship as a superficially benevolent gesture, then deported those same individuals to Comoros, a country most had never been to.

Again, while these three arcs of liberal citizenship illustrate a separation between the state and citizenship, they are also marked by inequality. CIPs function along the traditional lines of inequality by allowing those with higher socioeconomic statuses to gain access to opportunities lower ranked individuals cannot. They are using their status to increase their levels of access. Dual citizenship allows a more expansive group to gain access to multiple sets of rights, thereby not tying holders to a specific geographic realm. For both CIP users and dual citizens, if their home country is experiencing violence, they have the ability and means to avoid harm. While naturalization could allow for a similar safety net, it is one that is not open to all and often fraught with institutional requirements. To change one's citizenship, they may need to reside in the area for an extended period, adopt the dominant culture, and renounce their previous nationality. Within this trade-off, there are tangible benefits, but it is not something that can be done quickly, for most people. I argue that citizenship, and the associated regimes, are seated in these inequalities. The types of rights groups can access, who can access them, and how quickly one can gain access helps set them apart from others; thereby gaining new opportunities blocked for some.

However, as Chapter 6's case study notes, not all countries and regions are embracing the liberal citizenship norms discussed here. The GCC's history, economic arrangements, and social attitudes towards non-national groups creates an interesting look at how transnational scripts can be adopted. World society theory helps to explain the dispersion of citizenship

norms, but a dispersion that deeply depends on the state's political type (authoritarian or non-authoritarian) or the type of workers present (Mirilovic 2015). This research's qualitative approach adds support to other quantitative conclusions that regime-type plays a role in dual citizenship policy adoption. However, this study adds the substantive variables of culture, economy, and public perception to the script tool-kit. Within the GCC example, one sees that a specific reading of religion and culture has created symbolic situations favoring in-groups. Those born outside of the region cannot be trusted or incorporated, due to these long-held beliefs.

Further, while the democratic norms often associated with liberal citizenship scripts are absent in the region, it is not due to some fundamental incompatibility between the GCC and democracy. Instead, I posit that elite focus on local tribalism, bolstered by their restrictive reading of the Koran, was used to justify their position. A position that was further supported when oil deposits were discovered in the region, leading to the formation of the rentier state. This allowed the economies of the GCC to influence social situations via the creation of entitled classes, and the "others." Nationals directly benefit from the rentier arrangements, and see little reason to include non-national workers in profits and entitlements. Here, citizenship grants one access to economic gain. Being left out of the status means that not only does a worker not gain wealth, but they are also viewed as disposable commodities, regardless of their cultural and economic contributions.

Limitations and Future Work

My use of the GCC leads to one notable limitation of this work, it's limited applicability outside of the region. As I note in Chapter 6, the conditions surrounding the GCC's rejection of liberal citizenship norms cannot be effectively extended to other situations. The histories, economic arrangements, and cultural influences are specific to the member countries. While similarities may be observed in other authoritarian regimes or monoethnic states, the path to script rejection is based in local experience.

Despite the drawbacks of cultural peculiarities, this study provides tools that can be used in future global policy assessments. First, the holistic approach used to analyze script adoption is useful in identifying the local intricacies at play. The political, economic, social, and cultural influences in government policy cannot be explained away. While bureaucracy allows for agents to make policy decisions according to their own beliefs, those beliefs are founded in personal experience. Each agent is the product of past and present experiences. Further, the station they occupy within the bureaucratic system limits their power. While a Minister of Immigration in one country may be able to effectively stop movement into the country, an individual with the same title in another region may not be allowed to take that action. Thus, these holistic factors can affect national offices and their practices.

A second novel contribution of this research concerns CIPs. While the exact number of individuals taking advantage of CIPs is unknown, this work is among the first to create a complete list of the type of programs available. By identifying the enacted programs, researchers can, then, shift their focus to who is using what program, and begin to address many of the assumptions around golden passports. Do CIP users represent a new power elite?

How often are these programs used to expel unwanted groups? What are the experiences by these groups once they are deported? These questions provide opportunities for both quantitative and qualitative avenues of inquiry, where one can learn the breadth of CIP influence through demographic tracking and see the lived experience via personal interviews.

Such research opportunities also highlight some specific areas of inquiry that I would like to see take shape. The first concern is tied to the aforementioned logistics of movement. While there are various sources of data to assess traditional immigration and refugee movements, there is not a similar source for privileged movement methods, aside from "formal" systems like the United States' EB-5 Visa. I suspect that this is due, in part, to the profiles of those obtaining CIPs. Most CIPs are only open to the highest economic strata of society, as such, these individuals can also afford privacy. As noted earlier in this work, when performing internet searches for details on CIPs, I encountered numerous websites for brokers offering their services. All a client must do to gain a new passport is to pay the firm and they will take care of the actual process. This affords applicants a level of anonymity since they may not be required to sign forms as these firms can act as legal representatives. Essentially, one could gain a new citizenship without divulging the process to any outside group. Further, some countries highlight the economic benefits of their CIPs. By purchasing citizenship in some countries, one can then, use them as a tax haven and avoid paying the local rates (Gittleson 2014). To ensure this benefit is viable, those countries must protect the identities of their passport holders, providing a specific level of anonymity.

The second area of inquiry that could benefit in the coming years is in the realm of public opinion. Telhami's (2013) survey of public perceptions toward democracy in the Middle

East is among the only modern substantive works to consider how the people feel. While there

is a litany of works available to assess Western perceptions of Middle Eastern immigrants, I was

unable to locate a single study asking similar questions to Middle Eastern populations. This

could be due to the difficulties associated with gaining approvals for surveys in many of the

countries (Telhami 2013), but it would be useful to ask, "How do you feel about immigrants?"

Limited anecdotal evidence suggests that many individuals are indifferent toward non-nationals

in the region (Abdi 2015; Abrahamian 2015; Kanna 2011), but there is no broader data

available. I suspect that in the GCC's case, that many respondents may view non-nationals with

indifference, but without public opinion data to show this, I cannot be certain and nor can other

researchers.

Closing Thoughts

While inequality is a constant in our everyday lives, how humanity navigates those lives

varies greatly according to our basic status our citizenship. As Milanovic (2013) points out that if

one knew nothing else about any given individual in the world, they could, with a reasonable

amount of confidence, predict their income just from the knowledge of their citizenship.

Certainly, inequality is a relative term, as one nation's middle-class may be comparable to

another's wealthy elite, but I argue that the different opportunities afforded by our citizenships

can be equally impactful. Membership in a wealthy, "developed" country could mean that

citizens will be able to get an advanced education, remain safe during their daily lives, and voice

dissent openly. Others with citizenships in authoritarian or "undeveloped" areas may see their

life expectancies shortened, any public disagreements quashed, and limited opportunities for movement.

To limit the impact of global inequality, one must continue to debate the citizenship question. Are systems based on universal human rights the right decision? If so, who will ensure those rights are equally distributed? Who is considered a citizen here? Who can be protected? Who can be? Our problems are increasingly global with refugee populations flowing in-and-out of foreign lands. How do statuses affect them? What of the East Asian domestic workers and construction crews in Dubai? Citizenship is, not only, tied to us, but it becomes our reflection.

> People with "good" passports don't think about them much. But people with "bad" passports think of them a great deal. To the wealthy, this is particularly insulting: A bad passport is like a phantom limb that won't stop tingling no matter how much money, power, or success they've accumulated—a constant reminder that the playing field is never truly level, and that life for your average Canadian billionaire will be easier than for a billionaire from Botswana or Peru. (Abrahamian 2015:73)

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Appendix A: Ascriptive Citizenship Norms

The following list outlines the use of ascriptive citizenship norms by modern nation-states. While all countries use some form of the *jus sanguinis*—blood—form to pass on citizenship between generations, variations of the *jus soli*—soil—method are less frequent. The countries that rely—at least, in part—on the location of one's birth as an indicator of group membership are outlined below, and delineated according to the type of political regime in power in the given country.

Authoritarian: Azerbaijan, Cuba, Gambia, Guinea-Bissau, Rwanda

Non-Authoritarian: Albania, Antigua & Barbuda, Argentina, Austria, Barbados, Belize, Bolivia, Brazil, Canada, Chile, Costa Rica, Curaçao, Dominica, Dominican Republic, Ecuador, El Salvador, Grenada, Guatemala, Guyana, Honduras, Ireland, Jamaica, Lesotho, Mauritania, Mauritius, Mexico, Nepal, Nicaragua, Pakistan, Panama, Paraguay, Peru, Saint Kitts & Nevis, Saint Lucia, Saint Vincent & The Grenadines, South Africa, Spain, Trinidad & Tobago, United States, Uruguay, Venezuela, Zambia

Appendix B: Codebook

The following list of codes used in this research was based on Marshall's (2006) framework of citizenship rights. All codes existed in a binary of whether the language for each code was present or absent in the source material. When present the intricacies of the language was also observed.

Rights codes:

- Presence or absence of legal rights for dual citizens

- Economic rights:

    o Right to own private property for a business

        ▪ Rural business

        ▪ Urban business

    o Right to make investments in stock market

    o Employment: is additional documentation needed for the dual citizen?

        ▪ Visa

        ▪ Work Permit

        ▪ None

    o Right to own private property (home)

        ▪ Rural

        ▪ Urban

    o Taxes: which country is responsible for withholding tax?

        ▪ Primary (sending) country

- - Secondary (receiving) country

  - Both

- Political rights

  - Running for political office

  - Allowed to run for local office

    - Primary country

    - Secondary country

  - Allowed to Run for National Office

    - Primary country

    - Secondary country

  - Allowed to make political contributions

  - Barred from running for office

    - Federal

    - Local

  - Voting Rights

    - Primary country

    - Secondary country

    - None

- Social Rights

  - Movement within or between countries

    - Free

    - Limited

- Medical Care

- Government Assistance: who provides assistance?

    - Primary

    - Secondary

    - Both

- Religion: is adoption of a national religion required for citizenship?

    - Required

    - Not required

Strong Citizenship codes:

- *jus sanguinis*

- *jus soli*

- Other method

Weak Citizenship codes:

- Naturalization process

    - Military service required

    - Ethnic group membership

    - Exemption from process (either individuals or groups)

    - Familial ties

    - Has employment

    - Has not committed crimes

- Land occupation (e.g. living in an area when it is incorporated)

- Child's choice (child has a choice whether to apply)

- Minimum age for to start process

- Oath or Proclamation of allegiance required to complete process

- Period of residency

- Personal health (free of disease)

- Religious affiliation

- Renounce original citizenship

- Speaks dominant language

- Dual Citizenship (presence or absence)

- Merit-based citizenship

- Multiple citizenships

- Spousal citizenship

Regime codes:

- Liberal democracy

- Constitutional monarchy

- Emirati

- Communist

Revocation of Citizenship (how is citizenship lost?):

- Denial of citizenship (who is excluded)

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Research

2017, *Finding Their Place: A Comparative Study of Refugee Resettlement in Local Communities
 and Economies,* University of Wisconsin—Oshkosh, Co-Coordinator of Milwaukee-Metro
 Research Site

Teaching

Lectureships

2018, University of Wisconsin—Milwaukee, Social Change (Soc. 325) and The Social Organization of Technology (Soc. 327)

University of Wisconsin—Oshkosh, Modern Social Problems (Soc. 151) and Social Control (Soc. 355)

2017, UWM, Social Change in the Global Economy (Soc. 235) and The Social Organization of Technology (Soc. 327, online section)

2017 (summer interim), UWM, Introduction to Sociology (Soc. 101)

2016, UWM, Introduction to Sociology (Soc. 101) and The Social Organization of Technology (Soc. 327, online section)

2016, Gateway Technical College, Introduction to Sociology

2016, UWM, The Social Organization of Technology (Soc. 327, online section)

2016, UWO, Introduction to Sociology (Soc. 101)

2015-2016, UWM, Introduction to Sociology (Soc. 101) and The Social Organization of Technology (Soc. 327)

2014-2015, UWM, Introduction to Sociology (Soc. 101)

2012-2014, UWM, The Social Organization of Technology (Soc. 327)

2014, Bryant & Stratton College, Principles of Psychology (Psyc. 101)

2013, Bryant & Stratton College, Principles of Sociology (Socs. 102) and Principles of Psychology (Psyc. 101)

2013, UWO, Special Topics in Sociology: The Social Organization of Technology (Soc. 407)

2012, UWO, Introduction to Sociology (Soc. 101)

Teaching Assistantships

2010-2012, Soc. 101—Introduction to Sociology (Soc. 101), Dr. Kent Redding—Supervising Professor

2009-2010, Criminology (Soc. 241), Dr. Donald Green—Supervising Professor

Awards and Scholarships

2016, Graduate Student Paper Award, Sociology, University of Wisconsin—Milwaukee

2011-2012, Chancellor's Graduate Student Award, University of Wisconsin—Milwaukee

1998-2000, Presidential Scholarship (North Central College)

Presentations

2016, Midwest Sociological Society Annual Meeting: *Not Just a Matter of Politics: Non-Adoption of Liberal Citizenship Norms Among Authoritarian Regimes*

2016, MSS Annual Meeting, Session Presider: *Situated Knowledges in Global Sociology*

2014, American Sociological Association Annual Meeting, Regular Session: *The Transnational Soul: Citizenship(s) in a Global Age*

2012, Eastern Sociological Society Annual Meeting, MSS Annual Meeting, UWM Sociology Department Colloquium: *A New Media Fueled Revolution?: U.S. Embassy Cables, WikiLeaks, and the Tunisian Revolution*

2010, Wisconsin Sociological Association/Wisconsin Political Science Association Conference, Panel Discussion: *Applying to, Getting In and Surviving Graduate School*

Guest Lecture

2013, "An Issue of Attribution: The Tunisian Revolution, Media Interaction, and Agency," Globalization and Technology (Global 202), November 2013.

Professional Memberships and Service

American Sociological Association, Midwest Sociological Society, Society for the Study of Social Problems, Alpha Kappa Delta (Sociological Honor Society), Lambda Alpha—Honors Graduate (Anthropological Honor Society), Beta Beta Beta (Biological Honor Society)

2015, 2016, UWM Graduate School Wisconsin State Fair Volunteer

2013, Member, UWM Sociology Department Colloquium Committee

Manuscript Reviews: *Journal of Communication*, *New Media & Society*

M.A. Thesis Title

A New Media Fueled Revolution?: U.S. Embassy Cables, WikiLeaks, and the Tunisian Revolution, Dr. A. Aneesh—Committee Chair

Completed Graduate Coursework

Course work: Systematic Sociological Theory; Research Methods in Sociology; Advanced Statistical Methods; Methods of Research and Analysis for Urban Social Institutions II; Discourse Analysis; Introduction to SAS Programming; Survey Methods

Seminars: Sociology of Culture; Political Sociology; Urban Social Structure; Family and Intimate Relationships; Sociology of Organizations; Sociology of Religion; Social Inequality; Intercultural Communications; The Digital Mirror; Sociology of Contemporary Institutions; Race and Ethnic Relations; Globalization, Inequality, and Citizen Welfare

Relevant Skills

SPSS, SAS, and STATA statistical programs
Dedoose qualitative analysis software
Managing courses on the Desire to Learn (D2L) and Blackboard course systems
Designing and implementing online courses
Experience teaching large-enrollment lecture courses and small-enrollment seminar courses