7

The Application of *Hudûd* law to the Offence of Rape in Pakistan: A misconstruction of the principles of *Sharī'ah* law.

Muhammad Nazibur Rahman[1]

Rape is a grievous offence under Islamic criminal law and some scholars treat it as a form of the hadd offence of zinā(i.e. illicit sexual intercourse). This characterisation of rape as zinā is problematic and has been attacked by critics as being unfairly loaded against the victim. Moreover the standard of proof of zinā is extremely high as it does not permit women to testify, even if they are the victims. Further four male eye witnesses to the act are required and a failure to prove rape against the offender will render the accuser (i.e. both victim and witnesses) punishable for the hadd offence of qadhf (i.e. slander). Some modern and classic Muslim scholars therefore do not regard rape as zinā but treat it as a separate offence, such as hirâbah or ightisāb (i.e. as a form of violence), where the standard of proof is lower. Yet when Sharī'ah law was adopted in Pakistan in 1979, laws were enacted to treat rape as the hadd crime of zinā. Subsequently, because of widespread criticism, the Islamic law related to rape has been repealed and it is now treated as a common law offence. This article evaluates whether the purposes of Sharī'ah are served by treating rape as zinā, or as a separate offence.

Introduction

The application of *hudûd* laws in relation to the offence of rape in Pakistan was the subject of widespread criticism and controversy. As a result, they were amended and replaced by the Protection of Women (Criminal Laws Amendment) Act in 2006. Under the new law, rape is no longer judged by the principles of *sharī'ah*, and instead, considered a common law offence. This has given opponents of *sharī'ah*, an opportunity to attack Islam as being unjust to women. However many Muslim scholars view the application of *hudûd* law to the offence of rape as contradicting *Qur'ānic* principles and prophetic traditions. In this article, I will outline the reasons why the application of *hudûd* in relation to rape in Pakistan was not in compliance with *sharī'ah*. I will also provide a brief overview of rape in the Islamic context. An analysis of this nature may be useful in the redrafting of laws related to rape in parts of the Muslim world where there is a growing demand for adopting the *sharī'ah*."[S]ince 1972 seven countries have enacted legislation to reintroduce Islamic criminal law" including Libya, Pakistan, Iran, Sudan and United Arab Emirates[2]. There is even an ongoing debate as to whether parts of *sharī'ah* should be adopted for Muslims in a country, where they are minority. Dr Rowan Williams, the former Archbishop of Canterbury commented in 2008 that *sharī'ah* law in the UK "seems unavoidable."[3] In his view, adopting parts of Islamic *sharī'ah* would help maintain social cohesion.[4] His comments spurred on a debate over multiculturalism in the United Kingdom suggesting that there is a growing interest in *sharī'ah* law all over the world.

In the first part of the article I will briefly discuss the history of *hudûd* law in Pakistan, its criticisms and validity of those. The following section of the article will examine whether it is possible to draft an Islamic law related to rape addressing some of the problematic issues.

Brief history of *hudûd* law in Pakistan

In Pakistan, the *hudûd* ordinances were first introduced in February of 1979. This included the enactment of five presidential decrees: 1) Offences against Property (Enforcement of *Hudûd*) Ordinance, 2) The Offence of Zinā (Enforcement of *Hudûd*) Ordinance, 3) The Offence of Qadf (Enforcement of *Hudûd*) Ordinance,4) Prohibition (Enforcement of *Hadd*) Ordinance, and 5) The Execution of the Punishment of Whipping Ordinance[5] . The two Ordinances that dealt with sexual crimes were Offences of *Zinā* (Enforcement of *Hudûd*) Ordinance and Offences

1 The author completed his LLB (Hons.) from Northumbria University, UK. He also completed his M.A. in Islamic Studies from Loughborough University, UK and Diploma in Arabic and Islamic Studies from Al-Imam Muhammad bin Saud University, Riyadh, Saudi Arabia. Mr. Rahman was called to the Bar of England and Wales from the Hon. Society of Middle Temple and is also an Advocate of the Supreme Court of Bangladesh. The author can be reached at momenajib@yahoo.com.

2 Rudolph Peters, *Crime and Punishment in Islamic Law: Theory and Practice from the Sixteenth to the Twenty-first Century,* (New York: Cambridge University Press, 2005), 153.

3 "Sharia law in UK is 'unavoidable'" last modified February 7 2008, http://news.bbc.co.uk/2/hi/uk/7232661.stm

4 Ibid

5 Tahir Wasti, *The Application of Islamic Criminal Law in Pakistan,* (Boston: Brill, 2009), 4.

of *Qadf* (Enforcement of *Hudûd*) Ordinance, which dealt with false accusations of *zinā*.

Under the *Zinā* Ordinance, all sexual intercourse outside marriage was made an offence punishable by stoning to death or public flogging, while under the *Qadf* Ordinance, false accusations of *zinā* (sex outside of marriage) were punishable by flogging.

However after sustained and widespread criticism, the Protection of Women (Criminal Laws Amendment) Act, 2006 (Act VI of 2006) was introduced omitting section 3 of the *Zinā* Ordinance. This brought back the law of rape under the Pakistani Penal Code which was enacted during the colonial era. In other words, after 2006 rape was no longer considered as a hadd offence. On December 22, 2010, the Federal *Sharī'ah* Court of Pakistan declared certain sections of the Protection of Women (Criminal Laws Amendment) Act as violative of Article 203DD of the Pakistan Constitution. This Article argues that any law inconsistent with Qur'an and *Sunnah*, will be null and void. [6] However, the Federal *Sharī'ah* Court stopped short of commenting on the abolition of section 3 of the *Zinā* Ordinance, thus allowing rape to be still treated as a common law offence.[7]

Criticism of *Hudûd* Ordinance Related to Rape

The prosecution of rape under the *Zinā* Ordinance came under heavy criticism with concerns being raised with both the substantive as well as the procedural aspects of the law. A major problem relating to the Ordinance was that the evidence and the consequent punishment of rape or sex without consent (*zinā bil jabr*) was the same as with adultery or sex with consent (*zinā bil radha*). This led to the unfair treatment of women who failed to prove the allegation of rape. Unsuccessful prosecutions of rape often led to the victims being prosecuted for *zinā bil radha*. The victim's testimony would be considered as a confession to consensual sex, whereas the alleged rapist would escape punishment since he did not confess his guilt. Moreover, pregnancy was also considered as an evidence of *zinā bil radha* only against woman. In addition, it

6 "Sharia Court knocks out 3 sections of women`s protection act" last modified December 23 2010, http://www.dawn.com/news/592999/shariat-court-knocks-out-3-sections-of-women-s-protection-act

7 the judgment available at http://www.pakistani.org/pakistan/judgments/2010/fsc_wpb.pdf

was almost impossible for a victim of rape to prove her case against her perpetrators. For the enforcement of *hudûd*, the victim of rape had to produce four pious, honest, upright and adult male Muslim witnesses to prove the offence[8] and since no rapist would ever be likely to commit the crime in front of four male witnesses, this was an immense procedural flaw in dealing with rape under the *Zinā* Ordinance. The following cases illustrate the unjust treatment of female victims of sexual abuse due to the application of the *Zinā* Ordinance of Pakistan.

In 1983, a 15 year old Pakistani girl named Jehan Mina[9] accused her uncle and cousin of raping her and making her pregnant. Her pregnancy in the absence of proof of rape was seen as proof of fornication (*zinā bil radha*), which led to Jehan receiving a sentence of 100 lashes. Similarly in 2005, 19 year old Fareeda was also accused of *zinā bil radha* and subsequently flogged and imprisoned for not being able to prove that her pregnancy outside of marriage was due to rape and not fornication.[10] Even in the case of a married victim, Zafran Bibi,[11] who in 2002 filed a rape case and was sentenced to the capital(*hadd*) punishment of stoning, the court concluded that her accusation contained an admission to sex outside of marriage (*zinā bil radha*). So many rape victims were wrongly convicted of *zinā bil radha* that it was reported that "up to 80 per cent of women in Pakistan's jails were charged under rules that penalise rape victims.[12]

Validity of the Criticism

It is important to note that in most of the convictions where pregnancy was involved the judgments of the subordinate courts were later reversed by the superior judiciary.[13] According to Moeen H. Cheema, such errors occurred repeatedly due to the inability of the Federal *Sharī'a* Court firstly, to harmonise its jurisprudence and secondly, to publicise the relevant precedents.[14]

8 Ssction 8(b) of The Offence of Zina (Enforcement Of Hudood) Ordinance, 1979, Ordinance No. VII of 1979.

9 *Jehan Mina v The State*, PLD 1983 FSC 183

10 Dan McDougall, *Fareeda's fate: rape, prison and 25 lashes*, The Observer, Sept. 17, 2006.

11 "Zafran Bibi was raped, but a Pakistan judge decided it was adultery" last modified May 12 2002, http://www.theguardian.com/world/2002/may/12/theobserver

12 see note no.10.

13 Moeen H. Cheema, *Is pregnancy proof of Zinâ*?, Daily Time, October 14, 2006.

14 ibid

Despite the reversals by the Appellate Court, the cases of wrongly convicted women by the subordinate court continued to rise. Sometimes it would take up to months for the appeal cases to reach the Appellate Court by which time the woman's reputation would be tarnished forever. This was made all the more worse by the fact that the perpetrator accused of the rape would be acquitted for lack of evidence while the female victim would be convicted because of her pregnancy. As a result, there was complete disregard for basic human rights and social implications for the accused.[15]

On a positive note, in the case of *Sakina v. The State*,[16] the woman accused of *zinā* was not convicted by the courts due to the absence of consent. Such examples illustrate that the rape victim is not always convicted of *zinā bil radha* under the *Zinā* Ordinance. This has led to ambiguities. A penal statute must be clear and the objective of enforcing an act must be to protect the innocent and the victim. This has not been achieved by the *Zinā* Ordinance.[17]

Islamic Perspective

The Offence of Zinā

Like most mainstream religions, Islam considers illicit sexual intercourse (*zinā*) forbidden and a major sin. The concept of *zinā* applies to the actual intercourse involving the physical penetration that occurs in the absence of a legally binding marital tie and is equally punishable for both men and women.[18] The traditional Islamic framework makes no distinction between the two genders and treats men and women alike when it comes to punishment for illicit intercourse.

The issue of *zinā* is dealt with many times in the Qur'an. For instance, it is said "nor come nigh to adultery: for it is a shameful (deed) and an evil, opening the road (to other evils)."[19]

15 Shaheen Sardar Ali, *Interpretative strategies for women's human rights in a plural legal framework: Exploring judicial and state responses to Hudood laws in Pakistan,* (Harare: SEARCWL, 2007) 398.

16 Sakina v The State PLD 1981 FSC 320

17 Rubya Mehdi, *"The Protection of Women (Criminal Laws Amendment) Act, 2006 in Pakistan" Droit en cultures 59* (2010) 200.

18 Mouafiq al-DinIbn Qudamah, *Al-Mughni*, (Riyadh: Dar Alim al Kutub, 2012), vol. 10, 180.

19 Al-Qur'an, chapter 17, verse:32

Most of the verses regarding *zinā* can be found in chapter 24 of the Al-Qur'an. Verse 2 of this chapter begins by clearly specifying the punishment for *zinā* as follows:

> *"The woman and the man guilty of adultery or fornication, flog each of them with a hundred stripes: Let not compassion move you in their case, in a matter prescribed by Allah, if ye believe in Allah and the Last Day: and let a party of the Believers witness their punishment."*[20]

Since the punishment prescribed for *zinā* is severe, the standard of proof of the act of intercourse is higher than the common law standard of "beyond reasonable doubt." This can be done either by a willful confession or by four righteous male Muslim eye-witnesses. Failure to prove the case against the accused will render the accusers and witnesses guilty of false accusation, thus providing an extra layer of protection for the accused. It is clearly stated in the Qur'an that:

> *"those who launch a charge against chaste women, and produce not four witnesses (to support their allegations), flog them with eighty stripes; and reject their testimony ever after: for such men are wicked transgressors; - Unless they repent thereafter and mend (their conduct); for Allah is Oft-Forgiving, Most Merciful."*[21]

Such a strict procedure ensures that it is very difficult to convict an individual of *zinā* unless they admit it or commit the crime in public. Infact, in the Islamic legal history, there is no precedence of any conviction for *zinā* except for that which was confessed willfully.[22] This exemplifies both the Islamic concept of private accountability to God Almighty as well as the public duty to protect society from anarchy and widespread immorality. It is agreed by leading Muslim scholars that the act of *zinā* violates two rights.[23] By committing an act which has been forbidden by God, the person guilty of *zinā* transgresses the right of God Almighty. When such

20 Al-Qur'an, chapter 24, verse: 2

21 Al-Qur'an, chapter 24, verses 4-5

22 David F. Forte, *Studies In Islamic Law: Classical And Contemporary Application* (Lanham: Austin & Winfield, 1999), 81

23 Muhammad Abu Zahra, *Falsafah al-'úqubah fial-Fiqh al-Islami* (Cairo: Al-Alamiy yahlil nashr, 1966) 68.

an act becomes public, it also transgresses the morals laid down by society and it becomes the duty of the society to protect its morals. While the act itself is a matter judged by God Almighty, the public *hadd* punishment of *zinā* is directed towards the fact that such an act has been known publicly which disturbs public order and morality.[24]

The Offence of Rape

Although there is no direct Qur'anic verse relating to the concept of rape or sexual intercourse against the will of an individual, the Quran does deal with the punishment of those who violate individuals (*hirābah*):

> *"Indeed, the penalty for those who wage war against Allah and His Messenger and strive upon earth [to cause] anarchy(fasād) is none but that they be killed or crucified or that their hands and feet be cut off from opposite sides or that they be exiled from the land. That is for them a disgrace in this world; and for them in the Hereafter is a great punishment."*[25]

Since rape causes anarchy (*fasād*), the offence of rape will fall under the category of *hirābah* according to the decision of the Highest Fatwa Council of Saudi Arabia.[26] The standard of proof of rape is apparent from numerous prophetic traditions. One such tradition is described below:

> *"It is narrated on the authority of 'Alqamahbin Wa'il Al-Kindi from his father: "A women went out during the time of the Prophet (Peace be upon him) to perform prayer, but she was caught by a man and was raped, so she screamed and he left. Then a man came across her and she said: 'That man has done that to me', then she came across a group of Emigrants (Muhājirīn) and she said: 'That man raped me.' They went to get the man she suspected as the culprit, and they brought him to her. She said: 'Yes, that's him.' So they brought him to the Messenger of*

24 Muhammad Salim Áwa, *Fi Usul al-Nizam al-Janayi* (Cairo: Dar al-Maárif, 1979), 74.

25 Al-Qur'an, chapter 5, verse 33.

26 "Decision no. 85 dated 11/11/1401h" last modified April 27, 2015, http://www.alifta.net/Fatawa/fatawaDetails.aspx?View=Page&PageID=1676&PageNo=1&BookID=2. The Council is the highest religious body of Saudi Arabia which was established by a Royal Decree Dated 29.08.1971 (8th of Rajab 1391 AH). Its aim is to issue legal rulings (fatwa) on both religious and social affairs (http://fiqh.islammessage.com/News.aspx?id=96)

> *Allah (Peace be upon him).Based upon the testimony of the victim, when the prophet gave verdict to stone the alleged culprit, the actual culprit stood up and said: 'O Messenger of Allah, I am the one who did that.' So the Prophet (peace be upon him) said to her: 'Go, for Allah has forgiven you.' Then he said some nice words to the man (who was originally convicted) and ordered to stone the actual rapist to death' Then he said: 'He (the rapist) has repented a repentance that, if all the inhabitants of Al-Madinah had repented with, it would have been sufficient for them."*[27]

From this prophetic tradition, it is clear that although the punishments for rape and *zinā* seem similar, the standard of proof required to prove the two offences are very different. To prove *zinā*, the accuser must bring four male Muslim eye witnesses, whereas to prove rape, the testimony of the victim and the circumstantial evidences were sufficient. The same prophetic tradition further demonstrates that even when the victim was proven wrong in identifying the culprit, she was not punished for false accusation. In other words, the above prophetic tradition clearly suggests three important issues relating to Islamic law on rape: i) the standard of proof is not the same for both *zinā* and rape, ii) women can testify in rape cases, and iii) failure to prove a rape case will not give rise to criminal liability of qadf, i.e. falsely accusing one of *zinā*.

There is a general consensus among the jurists that unwilling female participant of a sexual intercourse shall not be punished but instead be compensated for. There is however, a difference of opinion regarding the way to distinguish a consensual intercourse from rape. It has been suggested that one way to determine a rape is to verify whether the victim, who had a choice to give consent or to deny, gave consent and whether her consent was given merely for the sexual activities itself or to prevent herself from greater harm.[28] It was further suggested by some scholars that coercion would be established in three following situations: first, if the victim is physically overpowered, second if she is unable to prevent it or flee from the scene and third, if she fears any kind of greater harm by not giving consent.[29] Once the

27 Abu `Isa Muhammad ibn `Isa Tirmidhi, *Jami` at-Tirmidhi* (Riyadh: Dar al-Salam, 2000), vol-3, book-15, Hadith no. 1454

28 Ibn RajbAl-Hanbali, *Jamiul Uloomwal Hikam* (Riyadh: Dar al-Salam, 1999) 374-375.

29 Muhammad bin Ahmad Ibn Rusd, *Bidayatul Mujtahidwa Nihayatul Muqtasid*, (Cairo: Maktabt Ibn Taymiyyah, 1994) vol-2, 61. Al-Sharbini, Shamsuddin Muhammad bin Ahmad, *Mughni al-*

elements of coercion has been established, the degree of harm threatened to the victim is not relevant, as evident from the verdict in a case decided by the second Caliph Umar. In that case a shepherd withheld drinking water from a woman unless she consented to intercourse, to which the woman agreed. When the case went to Umar, upon consultation with Ali, he decided that only the shepherd would be punished and not the woman.[30]

Most of the controversy and debate regarding the law of rape is centered around whether it is to be considered as a separate offence or a form of *zinā*. Due to the similarity in the nature of the prescribed punishment, rape is often misunderstood to be a form of *zinā*. However, from an evidentiary point of view, the act of rape was treated as a separate offence by the Prophet in the prophetic tradition discussed earlier. In addition, the Highest Fatwa Council of Saudi Arabia, as mentioned earlier, decided that rape would be considered as a *hirābah* crime and not as a form of *zinā*.[31] Therefore, the proper approach towards rape is to treat it as a completely separate offence and not as a form of *zinā*.

Moreover an important issue of the debate is whether an unsuccessful prosecution for rape should translate into a confession of *zinā*. If so, would this evidence be sufficient to prosecute the accuser for *zinā*, as was the case in Pakistan.[32] As mentioned earlier, willful confession is one of the ways of establishing that a *zinā* offence has occurred, however such a confession needs to clearly state that the intercourse was consensual and not under any coercion. When dealing with any offence, a well established principle in the Islamic law is that the guilt an *hudûd* offence must be proven beyond doubt. Hence, even if a willful confession has been provided, the confession will be examined for doubts as to whether the consent for intercourse was given under any form of coercion. If there is any doubt, (let alone an allegation of rape), the woman accused of *zinā* will be acquitted. Therefore in order to establish a case of *zinā*, it is not sufficient to confess that sexual intercourse had taken place, but the confession must also clearly specify that such act did not involve any form of coercion.

Muhtaj, (Bayrut: Dar al-Kitab, 1994) vol-3, 289.

30 Ahmed bin HussainAl-Bayhaqi, *Sunan al-Kubra*,(Beirut: Kitab al Dar, 2003)vol:8, page: 236

31 "Decision no. 85 dated 11/11/1401h" last modified April 27, 2015, http://www.alifta.net/Fatawa/fatawaDetails.aspx?View=Page&PageID=1676&PageNo=1&BookID=2.

32 (McDougall, 2006), see note 10 above.

According to Imam Abu Hanifa,[33] a woman being tried for the offence of *zinā* is required to be asked by the judge to defend herself. While defending herself, if the woman claims that she was raped, forced into a sexual relationship or had intercourse with a man whom she thought she was married to, then she would not be liable for *hadd* punishment.[34] This opinion is in agreement with that of Umar, a companion of the Prophet (PBUH) and the Second Caliph (Ruler) of Islam who in a case of *zinā* asked a woman who was pregnant but unmarried, to defend herself against the accusation of *zinā*. She replied, "I am a heavy sleeper, and a man raped me while I was asleep and then he left. I could not recognize him thereafter." Subsequently, her defence was accepted and she was released by Umar.[35] It is clear from this example that there is no room for accepting the testimony of an alleged rape victim as a confession for *zinā* in Islam. Therefore, any judge who convicts a woman for *zinā* based on her testimony for rape will be acting in contravention of the Islamic principles.

Furthermore, another issue of debate is whether pregnancy could be considered as proof for *zinā*, as was the case in Pakistan. In Islam, majority of the Muslim scholars agree that pregnancy is only circumstantial evidence that can be negated by the victim's testimony. Although Imam Malik[36] states that pregnancy is conclusive evidence for *zinā*, he also suggests some safeguards. These include physical evidence for rape such as violence and the testimony of any person who has heard the victim's cry for help.[37] However, the Maliki viewpoint is criticised by the likes of Ibn Hazm[38] who is opposed to the administration of *hadd* sentences based on mere

33 He is the founder of one of the four major schools of thought (Madhhab) in Islamic world. Most of the Muslims follow one of four Madhhabs, named after their founder scholars. Those are Hanafi Madhhab, Shafi Madhhab, Maleki Madhhab and Hanbali Madhhab. For more information: Bewley, Abdal Haqq, *The Four Madhhabs of Islam* (Norwich: Diwan Press, 2010).

34 Ali bin Ahmed Ibn Hazm, *Al-Muhalla Bi Al-Athar*, (Cairo: Muniriyyah, 1933) vol. 12,195-198.

35 Ibn Qudamah, *Al-Mughni*, vol. 10, 193.

36 Founder of Maleki Madhhab, see note 33.

37 Muhammad bin Abdul BaqiAl-Zurqani, *HashiyA T Al-Zurqani Ala Muw A Tt A' Al Imam Malik* (Cairo: Al-Maktabat al-Tawfiqiyyah, 2008) Vol. 4, 150.

38 One of the greatest Islamic scholar in Medieval era. Born and brought up in Andalus (Spain), he was a follower of Maliki school of thought in his early life. However, later in his life he followed Shafi school of thought. Nonetheless he has been considered as an independent jurist who preferred not to stick with a single school of thought. Often his school of thought is referred as Zahiri Madhhab. ("ibnHazm Al-Zahiri" last modified May 4, 2015, http://islamicencyclopedia.org/public/index/topicDetail/id/389/page/8

circumstantial evidence.[39] Therefore, it can be concluded that pregnancy by itself cannot be considered as evidence of *zinā* if there is a doubt that the pregnancy may have occurred as a result of rape.

Conclusion

According to the *Sharī'ah* therefore rape is not considered a branch of *zinā*, rather it is a separate offence. This is because the standards of proof are different for each offence. It is important to note that the Islamic precedents prescribe certain protections for the victims of rape who can testify without fear of prosecution, should they fail to prove their case. Not only are they allowed to testify, but their testimonies carry the highest degree of evidential value according to Islamic law. In addition, even if the testimony has been proven to be inaccurate or false, the victim will not be prosecuted for making false accusation. The *Hudûd* Ordinance of Pakistan on the other hand, did not consider rape as a separate offence, but rather as a form of *zinā*. As a result, the laws of *hudûd* did not provide protection to the victims of rape who were being prosecuted for *zinā* when they failed to substantiate the accusation. Consequently, this resulted in the unjust sentencing of rape victims to the *hadd* punishments for zinā, when in fact they should have been protected by law. Therefore, if the *hudûd* law had considered rape as a separate offence from *zinā*, as is the correct viewpoint according to Islamic law, there would have been no need to amend the *Zinā* Ordinance in 2006.

39 Ibn Hazm, *Al-Muhalla Bi Al-Athar,* vol. 12, 61.

Guidelines for Authors

The editor welcomes the submission of articles which illuminate legal problems or issues currently confronted by governments, international organizations, private enterprises etc, by setting them within their general legal , economic or political context. Of particular interest will be articles which are inter-disciplinary in nature. Authors and reviewers are advised to follow the guidelines below while preparing or reviewing the manuscripts.

1. All manuscripts must be within 5000-10000 words including footnotes. No manuscripts would be considered for publication if it exceeds the suggested word limit.
2. Submissions should be sent directly to the Editor-in-Chief at editor.uaplr@gmail.com as a Microsoft Word file.
3. A 150-words abstract should appear at the beginning of the article/paper.
4. A 40 -words biography of the author (s) should also be included.
5. UAPJLP engages in double-blind peer reviews; authors' names must be excluded from the text.
6. All materials should be clearly typed, double spaced on A4 paper.
7. The journal only accepts footnotes. Endnotes are not accepted. Bibliography or references are not necessary. All footnotes must be formatted according to the Chicago Manual Style. The authorized Chicago Manual Style (16th edition) can be accessed via this url: http://www.chicagomanualofstyle.org/home.html
8. Manuscripts submitted to UAPJLP should not have been published previously.
9. The articles published in UAPJLP do not represent the views of the editorial board. The Editor-in- Chief is responsible for the final selection of content and reserves the right not to publish work deemed inappropriate for publication.