

The New Legislative Trends to Combat Bullying Crimes in Jordanian Legislation

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Abstract

The Jordanian legislator introduced a new legal provision addressing the phenomenon of bullying and the issue of extortion. This was done by adding Article 415 bis to the Amended Jordanian Penal Code No. 10 of 2022, after it became apparent that traditional legal provisions were insufficient to achieve general deterrence and prevention. This study concluded with several findings, the most significant being that the Jordanian legislator adhered to the principle of proportionality between the act and the punishment, beginning with imprisonment for not less than two years, then three years, and reaching up to temporary labor for not less than 10 years, and even the death penalty. The key recommendation was the necessity for the Jordanian legislator to not deviate from general criminal law principles concerning incitement and participation in the crime of bullying, in line with the principle of gradualness in criminalization and punishment.

Keywords: Bullying crimes, confrontation, extortion.

Introduction

The year 2022 witnessed several legislative innovations, the most notable being amendments to the Jordanian Penal Code No. 16 of 1960 and its amendments. Despite the debates and legal controversies these amendments stirred, the recent changes included a legal provision that filled a legislative gap and confronted criminal acts represented by the display of power, threats of violence, and its actual use by perpetrators of bullying and extortion enforcers (Al-Emadi (2022).

The Jordanian legislator noted the significant spread of bullying and extortion crimes recently, especially after the “Zarqa boy” case. This case included terrorizing citizens and blatantly threatening their security and safety, damaging

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their property, and simultaneously compromising societal security and the state's authority (Al-Emadi (2022).

The Jordanian legislator criminalized bullying by adding Article 415 bis, upon realizing that the Penal Code provisions that criminalize the use of force, violence, or threats were insufficient. The traditional provisions were insufficient to curb bullying because they were limited to certain types of crimes, such as injuries, beating, threats, administering harmful substances, causing permanent disability, extortion by revealing secrets, and unjustly taking money. Additionally, the penalties stipulated in the Jordanian Penal Code for these crimes were misdemeanors, which were insufficient to achieve general deterrence, encouraging repeat offenses.

One of the main features of Article 415 bis is its reliance on a legislative punitive philosophy rooted in reality and the local development of crime, and its reliance on the principle of gradual criminalization and the penalties imposed. The article begins by imposing a penalty of imprisonment for not less than two years. This includes anyone who, either personally or through others, displays force, brandishes violence or threatens to use force or violence against him or his spouse, ascendants, descendants, or relatives up to the third degree. This also includes anyone who threatens to defame, or to infringe upon the privacy of his or their lives. This applies if the act or threat causes the victim to fear, disturbs his peace or tranquility, endangers his life or safety, damages his property or interests, or infringes on his personal freedom, honor, dignity, or the integrity of his will. The punishment escalates to three years of imprisonment if the act or threat is committed by two or more individuals or involves an animal that causes fear, or the carrying of a weapon, sharp tool, or incendiary material, among other items.

The legislator further escalates the punishment with imprisonment potentially reaching up to ten years. In other cases, culminating in the imposition of the death penalty if the criminal acts result in the amputation. The removal of an organ, the disabling of a sense, severe disfigurement, permanent disability, or death also culminate in the death penalty.

Researchers believe that the amendments to the Penal Code, specifically Article 415 bis, act as a deterrent against criminal acts that disrupt society's peace, stability, and public security. These amendments require increased awareness among individuals and society, to overcome the silence and fear from filing complaints against those who infringe upon society's rights, and security. Without sufficient awareness and legal culture, which makes individuals primary defenders of the rule of law, legal provisions will not achieve the legislator's intended purpose.

Based on the above, and given that the Penal Code reflects social life, it should adapt to contemporary needs, and be ready to criminalize and penalize any issue that arise. Thus, this branch of law must evolve and adjust to societal demands. Article 415 bis of the Jordanian Penal Code, is a relevant subject for research to understand its criminalization and deterrent effects on extortion and violence. This provision aims to deter anyone from using violence or extortion to exploit citizens (Al-Qadi, 2011).

Research Objectives

1. To explain the nature of the crime of bullying.
2. To outline the forms that constitute the material element of the crime of bullying.
3. To delineate the general and specific criminal intent of the crime of bullying.
4. To identify the aggravating circumstances for punishment under the graded penalty principle.
5. To highlight the crime of bullying as one of the most dangerous crimes, indicative of the prevalence of violence through methods of threat, robbery, and extortion.

Research Questions

1. This study seeks to answer several questions, including:
2. What is meant by bullying?
3. What are the forms of bullying that constitute its material element?
4. Does the mental element of the crime of bullying take the form of specific intent?
5. Did the Jordanian legislator employ a graded approach in criminalization and penalties for bullying?
6. What are the aggravating circumstances for punishment in bullying crimes?

Methodology

This study adopts the descriptive-analytical method, as it is the most suitable for presenting and analyzing the legal texts in the Jordanian Penal Code relevant to the study's subject, and then offering our viewpoint on these texts. It involves a comprehensive review of existing literature and a detailed examination of relevant articles within the Penal Code, focusing on language, structure, and legal implications. Comparative analysis with other legal systems and historical context is used to highlight differences and areas for reform.

Literature Review

The literature review of this paper is divided into three parts. The first focuses on The Nature of Bullying; this section will define what constitutes bullying, offering insight into its characteristics and the general understanding of the term as per legal context. The Second part of this section looks into the Elements of the Material and Moral Component of the Crime of Bullying; this will detail the specific acts that contribute to the material element (*actus reus*) of the crime of bullying, as stipulated in the law, as well as the mental state (*mens rea*) required for its commission. The focus will be on explaining the intent and purpose behind such criminal behavior, in line with the provisions of Article 415 bis. The Third part of this section looks into The Enhanced Circumstances for Punishment in the Crime of Thuggery.

The term "Balṭaji" signifies a state of chaos, vandalism, and lawlessness. The verb "Balṭaja" means to coerce, unfairly assault others, committing acts contrary to law and custom (Bahaa, 2021). Notably, the term "Balṭaja" or "Balṭaji" does not appear in traditional Arabic dictionaries. However, the word "bulṭu" is found in the Arabic dictionary "Al-Waseet," meaning the iron tool used by a lathe operator, and "Bulṭah," an axe used for cutting wood, slaughtering, or chopping (Al-Qadi, 2011). In "Al-Munjed" dictionary, "Balṭaji" is described as a person who cuts trees and builds fortresses among other activities (Al-Adly, 2010).

The term "Balṭaja" is colloquial and lacks an origin in Arabic; it derives from the Turkish word "Balṭı," consisting of two parts: "Balṭa" and "ji," meaning the owner or bearer of an axe. The axe, a sharp tool used for cutting trees and breaking wood, symbolizes violence, harshness, and severity (Qadi, 2011).

Historically, the term "Balṭaji" did not denote the current, widely understood concept. It evolved to signify a person who uses force or threats to intimidate others, seeks regular extortion or forces unlawful actions. The Egyptian legislator was the pioneer in criminalizing bullying through Penal Code No. 6 of 1998 by adding Articles 375 bis and 375 bis/A.

The Jordanian legislator followed suit by criminalizing bullying or what is termed "terrorizing and intimidating acts" through the newly introduced provision in the Jordanian Penal Code No. 10 of 2022, represented by Article 415 bis. It is appropriate to define both terms - as they essentially cover what people commonly refer to as bullying - to understand the legislative intent behind using the terms "terrorizing" alongside "intimidating." Was this a successful choice by the Jordanian legislator in describing bullying acts?

To answer this, one must first define "intimidation" and "terrorizing." Intimidation involves a form of threatening, i.e., warning of harm or instilling fear through coercion, predicting potential harm to individuals or things connected to

them, such as kidnapping or assault. Intimidation can include actions like brandishing a knife or threatening with a weapon. Terrorizing means inducing a more profound, primal fear, creating a pervasive feeling of danger. While both result in fear, terror includes a more intrinsic, physiological response, compared to the psychological effect of intimidation.

Thus, the Egyptian and subsequently the Jordanian legislator was effective in placing "terrorizing" alongside "intimidation," expanding the scope of exerting pressure on a victim's will. This approach addresses fear inflicted not only physically but psychologically as well.

Elements of the Material and Moral Component of the Crime of Bullying

As highlighted above, the Jordanian legislator added new provisions in the Amended Penal Code No. 10 of 2022. These provisions aim to maintain societal security, enforcing the rule of law, and curbing those who threaten community safety and challenge law and order.

Further, Article 415 bis states to criminalize anyone who, personally or through others:

- a. Displays force in front of a person,
- b. Threatens with violence or uses force or violence against someone, their spouse, ascendants, descendants, or relatives up to the third degree,
- c. Threatens defamation against them or any of them, leading to disgrace,
- d. Infringes on the sanctity of their or their family's private life.

These enumerations highlight the comprehensive approach taken by the Jordanian legislator to address and criminalize bullying effectively.

The Jordanian legislator, in Article 415 bis, designated the actions as constituting the material element of the crime of bullying, without requiring the occurrence of all these actions collectively. The presence of any one of the actions listed by the legislator in Article 415 bis is sufficient for constituting the material element of the crime of bullying. Moreover, the perpetrator must also possess the necessary mental element (*mens rea*), which includes both knowledge and intent. The perpetrator must be aware of their actions and have the malicious intent. Their objective, thus, is to infringe upon the private life of the victim or their mentioned relatives up to the third degree. They aim to terrorize or intimidate by inflicting physical or psychological harm, violating their honor, or extorting their money. They seek to obtain benefits, influence the victim's will, impose force, or force actions or inactions. Additionally, they may obstruct laws or resist the enforcement

judgments and legal procedures. Below are the forms of the material element in the crime of bullying:

a. Displaying Force in Front of a Person

The Jordanian legislator has established that the act of displaying force, which means demonstrating power, constitutes the material element of the crime, even if it is not accompanied by other actions. Consequently, the mere presence of any of the actions listed in Article 415 bis is sufficient to constitute the material element of bullying.

Displaying force implies an affirmative act from the perpetrator in front of the victim. Force is synonymous with coercion and compulsion. For instance, when a group of individuals engages in intimidating behavior by visiting a person's residence with the intent to terrorize and intimidate the occupant, often displaying physical strength or aggression to induce fear. This can be done with or without a weapon, whether the weapon is real or fake, and whether it is a firearm or another dangerous item. The use of a weapon can include inherently dangerous weapons such as firearms or specifically designated dangerous items such as knives. (Nael, 2000) The rationale is that the mere sight of a weapon in the perpetrator's hand is enough to instill fear in the victim and prevent resistance, let alone thinking about it.

It is not necessary for the perpetrator himself to display force; force can be displayed through others, as indicated in Article 415 bis, which states anyone "who acts on their own or through others in displaying force in front of a person." For instance, a person with influence might hire a group of bullies to intimidate a victim into compliance or to frighten them into preforming illegal acts.

It is also not required that the display of force causes actual harm to the victim. The crime of bullying is classified as a crime of danger, where the mere engagement in the criminalized behavior is sufficient.

The law explicitly requires that the display of force must cause the victim to feel terror, disturb their peace, endanger their life or safety, or damage their property, or infringe on their personal freedom, honor, reputation, or willpower (Suroor, 2015). The determination of whether an act constitutes a display of force is a factual matter left to the discretion of the trial judge based on the circumstances of the case.

The Amman Misdemeanor Court in its decision No. 13905/2022 also stated:

"The defendant's intention in displaying force and threatening violence was to terrorize and intimidate the complainants by harming them and exerting control over them, which he successfully did. The complainants filed their

complaints due to fear. The defendant's actions in displaying force, threatening violence, and attempting to use it with conscious and deliberate intent to terrorize the complainants constitute all the elements of the crime attributed to him, requiring the court to convict him accordingly."

b. Brandishing Violence or Threatening to Use Force or Violence Against a Person, Their Spouse, Ascendants, Descendants, or Relatives up to the Third Degree.

This involves engaging in behaviors that threaten the victim or their immediate family members with violence or force, aiming to coerce, intimidate, or frighten them into compliance or submission against their will, which is not required by the law.

The elements of the material crime in bullying as per the Jordanian legislation involve demonstrating power or threatening the victim with violence. The perpetrator's actions do not necessarily have to cause physical harm; the intention to intimidate or coerce is sufficient to meet the legal requirements for the crime.

Brandishing violence, as described in Article 415 bis, involves the perpetrator threatening the victim with the use of force in a manner that instills fear and terror. An example of this could be the perpetrator holding a bottle, not using it—which would otherwise be considered displaying force—but simply holding it and threatening to use it to injure the victim. Alternatively, the perpetrator might expressly threaten the victim with the use of force, instilling fear and terror (Al-Shawa, 1986).

The Court of First Instance, in its appellate capacity, ruled in Decision No. 2123/2022:

"In applying these elements to the established facts, it is found that the actions of the defendant included entering the home of the complainant's elderly mother. Additionally, appearing in the middle of the night in front of the complainant's house where his children were sitting, attacking and threatening them, and attempting to hit them with a tool.

The defendant then went back to the complainant's home in the Wihdat area, returned with a sharp tool (an axe). He continued to pursue the complainant's son until neighbors intervened. These actions, performed by the defendant, knowing their potential to terrorize and frighten the complainants and cause them harm, created fear and deprived the peaceful of their tranquility. Therefore, the complainants filed their complaint, fulfilling one of the forms

specified in Article 415/1/A Bis of the Penal Code, which is displaying force and brandishing violence."

c. Threatening to Defame the Victim or Their Spouse or Any of Their Ascendants or Descendants with Slander

The Jordanian legislator added to the legal text the expression "threatening to defame the victim or any of them," where the term "defame" encompasses a broad range of actions that fall under crimes against honor and reputation. This criminalization aims to protect the societal status that individuals hold and their right to be treated according to that status. According to Al-Shawa (2002), honor and reputation refer to "the status each person occupies in society and the associated right to be treated in a manner consistent with that status," meaning they should be afforded the trust and respect corresponding to their social standing.

This form of bullying is exemplified by the perpetrator's attempts to degrade the victim's social standing or damage their reputation among others by falsely accusing them of being a bribe-taker, embezzler, adulterer, infected with contagious diseases like AIDS, a judge involved in both judging and practicing law, an infidel, or claiming that the victim's wife is a loose woman (Hassan, 2020). The researchers believe that the Jordanian legislator deemed the mere threat of defamation "in a manner discrediting to the victim" as a sufficient offense. If the perpetrator actually carries out the threat of defamation, they could be prosecuted for other crimes such as slander, libel, and defamation.

The perpetrator must be aware that they are falsely defaming the victim or those mentioned in the text with an incident that could lower their social status. Such incidents, if true, could warrant punishment for the victim or could lead to their contempt within their community. It does not matter whether the defamation itself constitutes a crime; it is sufficient if the defamation is disgraceful enough to render the victim subject to social scorn and contempt (Al-Amadi, 2022).

d. Threatening to Infringe Upon the Victim's Private Life or the Private Life of Any of Their Spouse, Ascendants, or Descendants

The Jordanian legislator did not define "private life" in the Penal Code, leaving it to legal scholars and the judiciary. To determine criminal responsibility, private life must be defined. The Amman Court of Appeal, in its Decision No. 33568/2009, opined that private life includes marital, romantic, and family life, as well as events and occurrences related to an individual's life. Private life is thus the domain an individual considers secret from others, entitling them to prevent others from interfering in it to enjoy peace and tranquility (Lamzar, 2022).

The essence of private life is confidentiality (Al-jabra, 2022). An individual strives to keep their private life details undisclosed from others, revealing them only with permission. This confidentiality involves an event or

occurrence that the law protects. The privacy breach must be related to the individual and can affect them materially or morally if disclosed to the public, showing the individual's intent to keep it confidential. Regardless of its nature, whether familial, health-related, commercial, or personal, it is protected by law. However, certain legal provisions require individuals to report specific information, even if it is considered confidential, such as a doctor who discovers that a patient's wound resulted from a crime. Keeping such information secret could itself be a criminal offense (Namer, 2022).

This form of criminal behavior is also evident when the perpetrator threatens to infringe upon the private life of the victim, their spouse, or their relatives. Examples include threats to wiretap phone conversations, view private correspondence, or publish a photo of the victim or their relatives in a private setting. The threat must be likely to infringe upon the victims or their relatives' private life and cause fear, disturb their security, or peace. These factual matters are subjective to the discretion of the trial judge based on the circumstances and details of each case (Al-Qadi, 2011).

This detailed examination reveals how different forms of criminal behavior under Article 415 bis of the Jordanian Penal Code are intended to be interpreted and enforced. Article 415 bis aims to protect individuals' rights to security, reputation, and privacy in the face of various threats and intimidations. The Jordanian Constitution ensures citizens' right to the sanctity of their private life, as stipulated in Article 7, which states: "1. Personal freedom is inviolable. 2. Any infringement on the rights and public freedoms or the sanctity of the private life of Jordanians constitutes a crime punishable by law." Through examination of the above text, we find that the Jordanian legislator hastened to translate the constitutional concept of protecting the sanctity of private life by including various forms of intrusion upon private life within the scope of criminalization and punishment, through providing preventive protection in Article 415 bis. It is considered that mere threat to violate private life constitutes a form of thuggery that warrants criminal punishment for this crime.

It is noteworthy that the Jordanian legislator succeeded to some extent in defining criminal acts falling under thuggery, by limiting them to acts displaying force, threatening violence, or infringing upon the sanctity of private life. Therefore, any criminal act that involves a form not specified in the legislative text does not fall under the concept of thuggery, regardless of the resulting damages. The legislator's delineation of criminal acts under the crime should not be subject to interpretation or expansion. (Nael, 2000).

By analyzing the aforementioned article, it becomes clear that the philosophy behind criminalizing thuggery in Jordan aims to establish a protective

and preventive approach for society, preventing lawlessness from prevailing and safeguarding individuals from actual harm encompassed by criminal protection. The legislator aimed to protect individuals in their lives, physical safety, personal freedoms, honor, and will, from the danger of assault. It also aimed to prevent damage to individuals' property or legitimate interests.

The moral element in the crime of thuggery

The criminal intent is defined in Article 63 of the Jordanian Penal Code using the term "intent". It states that criminal intent is the will to commit the crime as defined by the law. The general criminal intent in the crime of thuggery consists of two elements: knowledge and will. The perpetrator must be aware at the time of committing the criminal act that they are engaging in a display of power before a person, threatening him with violence, using force or violence against him, his spouse, descendants, relatives up to the third degree, or tarnishing his reputation, or violating his private life or that of any of them. The perpetrator's intent should be to commit the act despite knowing that it is punishable by law, with the expectation of the criminal result, establishing a causal relationship between the act and the outcome.

The perpetrator should also aim to achieve a specific purpose mentioned in the index article, which constitutes the special criminal intent in this crime Terrorizing or intimidating the victim by causing physical or psychological harm. The harm referred to is any damage affecting a person's rights or legitimate interests, comprising two types. The first type is material harm, disrupting a person's financial interests and including physical harm. The second type is moral harm, affecting a person's honor, dignity, freedom, social status, or financial status. Therefore, simply causing the victim to feel fear or terror from physical or psychological harm to themselves or their family members constitutes the crime of thuggery (Al-Emadi, 2022).

Results and Discussion

The study has come up with several results, the most prominent of which are listed as follows:

- A. There is no term in Jordanian legislation that specifically refers to the term 'thug.' A thug is a person who uses force, threats, or gestures towards others to intimidate and frighten them into providing regular extortion payments or to compel them to perform acts that are not in accordance with the law.
- B. The importance of introducing a legal provision that addresses the issue of thuggery and extortion, which filled a legislative gap and addressed

criminal acts involving the display of force, threats of violence, and their use by perpetrators of thuggery and extortionists.

- C. The Jordanian legislator was prudent in introducing the term ‘intimidation’ alongside ‘frightening.’ This indicates that the Jordanian legislator has given greater breadth to the pressure on the victim. Not only did he consider physical fear, but also the fear that affects the mind or soul.
- D. The Jordanian legislator observed the principle of gradation and proportionality between the act and the punishment by progressively escalating the punishment for thuggery, starting with imprisonment of not less than two years, then three years, and culminating in temporary hard labor of not less than 10 years, up to the death penalty to ensure achieving general and specific deterrence.
- E. The amendments made to the Penal Code, specifically the text of Article 415bis, have placed limits on these criminal acts that resulted in a clear violation of society's right to enjoy peace, stability, security, and public tranquility.

Conclusion

Crimes of thuggery are considered crimes introduced by the Jordanian legislator in the amended Jordanian Penal Code No. (10) of 2022, specifically in Article (415 bis), after the Jordanian legislator noticed their significant spread recently, especially after the case of the “Zarqa boy”.

This case prompted the need to expedite the legislation regulating the crime of thuggery, as it is a serious crime that leads to serious disruption of public order and security, endangering the lives, property, and possessions of citizens. Therefore, it has become necessary for us to study this crime to clarify the concept of thuggery and then explain its legal structure by addressing its general elements and the aggravating circumstances for punishment.

Recommendations

We urge the Jordanian legislator, in line with the principle of gradation in the process of criminalization and punishment for thuggery acts, to keep the general principles of holding the instigators and accomplices in thuggery crimes accountable.

We contend that conducting the confiscation of funds belonging to perpetrators of thuggery and extortionists that are obtained illegally, stripping them of the economic cover that enables them to finance their criminal activities.

Alternatively, imposing provisional attachment on any funds acquired through illegitimate means such as extortion and extortion payments.

We recommend the Jordanian legislator to introduce a legal provision in the Penal Code and Crime Prevention Law that grants powers to judges, public prosecutors, and administrative judges to reject retaliatory complaints - the principle of counter-complaint - filed by recidivists (individuals with criminal constraints) engaging in thuggery or extortion, in order to deter them, reduce their influence, and deliver justice to those who have been wronged by this group.

References

- Abd Al- Latif, L. (2022). *Criminal Procedural Protection of Digital Privacy - Call Recording and Remote Communication as a Model - Comparative Study.*" *Al-Zaytoonah University of Jordan Journal for Legal Studies*, (2)3. 22-35.
- Ahmed, F. S. (2015). *Al-Wasit in Explaining the Penal Code - General Section.*" Egypt, Cairo: Dar Al-Nahda Al-Arabiya for Publishing and Distribution.
- Ali, A. A.& Moneer, A. & Sara, A. (2022). *Legal Protection of Private Electronic Life: Problems and Solutions.*" In *Digital Economy, Business Analytics, and Big Data Analytics Applications* (pp. 717-726). Cham: Springer International Publishing.
- Bahaa, A. (2021). *Concise Explanation of Thuggery Crimes (Intimidation, Frightening, and Disturbance of Peace).*" Egypt, Cairo: Al-Ahram Center for Legal Publications.
- Hanadi, A. A. (2022). *Criminal Behavior Patterns of Thuggery Crime according to Jordanian Legislation.*" *Al-Zaytoonah University of Jordan Journal for Legal Studies*, 3(3). 107-130.
- Hanadi, A. A. (2022). *Towards a Legal Organization for Combating the Phenomenon of Thuggery in Jordanian Legislation.*" Master's thesis, Faculty of Law, Al-Zaytoonah University of Jordan.
- Hassan, Osama Mohammed. (2020). *Thuggery Crime in Egyptian Legislation and the Role of the Police in Combating It.*" Egypt, Cairo: Dar Al-Nahda Al-Arabiya for Publishing and Distribution.
- Ibrahim, E. N. (2000). *Intimidation and Frightening Crime 'Thuggery': An Analytical Study of Articles 375 (Repeated) and 375 (Repeated/A) of the Penal Code Added by Law No. 6 of 1998.*" Egypt, Cairo: Dar Al-Nahda Al-Arabiya.
- Mahmoud, A. (2012). *Threat and Intimidation in Criminal Legislation - Applied Analytical Study.* Doctoral dissertation, Cairo University, Egypt, Cairo.

- Mahmoud, S. A. (2010). *Al-Wasit in Explaining Thuggery Crimes according to Law No. 6 of 1998 in Light of the Opinions of Jurists and Judicial Rulings.*"Egypt, Cairo: Dar Al-Nahda Al-Arabiya for Publishing and Distribution.
- Mohamed, S A. (2002). *Crimes of Thuggery.*"Egypt, Cairo: Dar Al-Nahda Al-Arabiya for Publishing and Distribution.
- Najib, H. (1988). *"Explanation of the Penal Code, General Section.* Egypt, Cairo, Dar al-Nahda Arabic.
- Rami, M. Q. (2011). *The Legislative and Security Confrontation of the Thuggery Phenomenon in Egyptian Law.*"Egypt, Cairo: Dar Al-Nahda Al-Arabiya for Publishing and Distribution.
- Rami, M.Q. (2011). *Combating Thuggery in Egyptian Law.*"Egypt, Cairo: Dar Al-Nahda Al-Arabiya for Publishing and Distribution.
- Saeed, M. A. (2006). *Crimes of Thuggery.*" Unpublished master's thesis, Cairo University, Cairo, Egypt.
- Saeed, N. (2022). *Explanation of the Penal Code - Crimes Against Persons.*" Jordan, Amman: Dar Al-Thaqafa Library for Publishing and Distribution.