

THE POLITICS OF BRANDING PHOOLAN DEVI: A CONUNDRUM OF TERRORISM V/SJUSTICE

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ABSTRACT

The notion of ‘one man’s terrorist is other man’s freedom fighter’ is highly debated when it comes to branding a person as a terrorist in academia as well as in the legal field. In the absence of an internationally accepted definition of terrorism, the usage of the word “terrorism” and “resistance” is often misused and hence, branding of someone being a “terrorist” or “resister” becomes sloppy and incorrect. Phoolan Devi, the *Bandit Queen*, on one hand is seen to be a dauntless dacoit dressed in Khaki with a rifle on her shoulder who killed 22 Thakur men in broad day-light. And on the other hand, she emerges as ‘figure of resistance’ for the people of her community who stood up against the atrocities committed to them and killed their perpetrators. Now, is she a terrorist or a resistor?

This research looks into the politics of these definitions and the politics of branding establishing the idea that defining/branding comes into play with a certain exercise of power indicating towards the politics of hierarchy. Therefore, definitions of ‘terrorism’ and ‘resistance’ are based on their contextual references and depend on who defines and with what motives and what agency.

Keywords- Terrorism, Resistance, Phoolan Devi, State, Media

Introduction

Phoolan Devi, a dauntless dacoit who is also seen as an icon of resistance was born in Uttar Pradesh’s Ghura ka Purwa village in 1963. She belonged to the Mallah community which was oppressed by the upper caste Thakurs of the village. She came to lime light after the Behmai massacre case where she killed 22 thakur men of Behmai, a village near Kanpur in Uttar Pradesh along with her gang as a revenge of her alleged rape by the two upper- caste Thakur men, Lala Ram and Sri Ram of the village. This provoked outrage across the country and massive police

manhunt was launched, which later failed because of the support of the poor from the oppressed castes. After her eleven years of unsentenced term in jail, she joined the Samajwadi Party and also contested in the election. She won and was elected as a Member of Parliament and sought to be the voice of the oppressed.

The notion of ‘one man’s terrorist is other man’s freedom fighter’ is highly debated when it comes to branding a person as a terrorist in academia as well as in the legal field. In the absence of an internationally accepted definition of terrorism, the usage of the word “terrorism” and “resistance” is often misused which that leads to misinterpretation and hence, branding of someone being a “terrorist” or “resister” becomes sloppy and incorrect. So, the question is when does a resister become a terrorist? Phoolan Devi is one such example of the given scenario. She is considered to be an icon of resistance but she was a notorious bandit who had committed several crimes which included several kidnappings, robberies, etc, and the Behmai massacre where she killed 20 men along with her gang along. as a revenge for her alleged rape. So therefore, should one see this as an act of terrorism or an act of resistance? Despite having committed an act of terror where she killed 20 men, along with various other crimes, she is looked upon as a revolutionary. The research shall look into the various details of the crimes she had committed and trace the trajectory of it along with evaluating them with the different definitions of terrorism and resistance. And finally addressing the question of who gets to define and under what circumstances.

Terrorism is considered to be a contested concept because it becomes difficult for the people to agree on its meaning or the scope that lies in the meaning. (Schmid 59). Most of the terrorists across the world describe themselves by using terms like ‘martyr’, ‘soldier’, ‘resistance fighter’, ‘revolutionary’ etc. This leads to the notion of ‘one man’s freedom fighter is other man’s terrorist’. Statements like these reflect on the widespread political praxis, but its relativism is not satisfactory when seen from an intellectual or ethical point of view (Schmid 59).

Schmid at one point claims terrorism to be a “method of combat in which random or symbolic victims serve as an instrumental target of violence”. Now, if one takes this point into consideration while looking at Phoolan Devi’s case, then the ‘symbolic’ killing of the 20 Thakur men in Behmai as revenge for her alleged rape and the continuous oppression by them can be seen as an act of terrorism. But on another instance, one should also remember that this claim of someone being a terrorist or not is a man-made construct that should also look at the interests of the person who defines the act (Schmid 71).

Crenshaw writes about how the act of terrorism occurs in both the contexts where violence and resistance is used against the one in power or also in the service of the one who holds power’s interests. If one focuses on the act of terrorism against the one who holds power for purposes of

political change, where there is a use of the ‘threat of symbolic’, then the terrorist violence communicates the political message that the perpetrators want to convey (Crenshaw 379). The one who defines the act here, is the one who is still in power and has the authority to condemn the act. Bringing in the context of Phoolan Devi’s case, one can observe the politics of branding.

In the question of branding terrorists, another important aspect in Phoolan Devi’s case is her gender. In a study conducted by Talbot, she observes that the average depiction of women terrorists generally “draws on notions that they are (a) extremist feminists; (b) only bound into terrorism via a relationship with a man; (c) only acting in supporting roles within terrorist organizations; (d) mentally inept; (e) unfeminine in some way; or any combination of the above” (Talbot 165). This is what we observe in the biographical adaptations of Phoolan Devi in mainstream media where the reasons of her association with the bandit group is popularly depicted either because of her relationship with Mallah or the gender-based abuse she faced by the Thakur men. Ramanujan observes how the representations of the Phoolan Devi’s early life, including Kapoor’s film, *Bandit Queen*, 1994, tend to focus on the rape and sexual violence as a reason for her reinvention of herself as an avenging bandit (Ramanujan 369). Observations and their representation like these tend to change the context and reduce the motive to a personal revenge rather than what she claimed to be a response to the oppression of her community by the Thakurs. Gendered observations like these affect the branding of a person and the committed act.

The study will look at multiple narratives on Phoolan Devi in academia, pop-culture, like books and films, and also look at the various interviews of her as well as her critics by keeping the idea of terror and resistance as the focal area. The study will also look at the various newspaper reports, articles and also opinion pieces that have been written on her to understand the position of branding.

Phoolan Devi is an acclaimed as well as criticised figure in the Indian context. On one hand she is called a ‘notorious criminal’ and on the other hand, she is praised as the ‘Bandit queen’ or a ‘robin hood for the poor’. And hence, her identity of being a criminal or a resistor is continuously contested. The objective of this research hence, will be to look at the definitions of resistance and terrorism and evaluate the position of Phoolan Devi’s branding. The research will also try to reach a conclusion or on a point from where resistance changes to terrorism.

The research is going to be secondary research and will look at the various narratives on Phoolan Devi and evaluate her story with the theories available on domestic terrorism and women resistance. The research will look at various theories from the area of resistance and terrorism and evaluate the narratives on Phoolan Devi and the crimes committed by her according to the definitions. It will attempt a close reading on narratives of Phoolan Devi, for example, the autobiography of Phoolan Devi, *I, Phoolan Devi- The Autobiography of India’s Bandit Queen*,

published in 1996. The film *Bandit Queen*, 1994 by Shekhar Kapoor, which is highly contested for its 'gender biased' representation will also be one of the focus points of the study to understand the public and the mainstream response to the icon of resistance, etc. An analysis of the existing archives of interviews of Phoolan Devi and the people who had been against her along with the statements given by the court shall be done to evaluate them along with the existing definitions of terrorism.

Hence, this research will evaluate various definitions of terrorism and instances of resistance to draw a line between the two by primarily studying the case of Phoolan Devi. The research aims to understand the politics of branding of people by evaluating the power positions of who brands and defines. Branding of people has always been a topic of discussion and becomes even more relevant in the current time and hence, the position of who defines and why should be studied well. The question of taking up arms in resistance is justifiable or not has been a point of debate since a long time and the study aims to draw an answer to the question by looking at Phoolan Devi's case.

Literature Review

'Terrorism', as a concept has been defined by various scholars, organizations, and governments worldwide across time. The parameters used to define are varied which directs us to the idea that the phenomenon is context sensitive and ever-evolving. Therefore, the study of 'terrorism' can be looked at from various approaches like political science, criminology, religious studies, war studies, human rights, etc. The idea can be looked at from various frameworks such as- 1. acts of terrorism as/and crime; 2. acts of terrorism as/and politics; 3. acts of terrorism as/and warfare; 4. acts of terrorism as/and communication; 5. acts of terrorism as/and religious crusade/jihad. (Schmid 204) The frameworks can be treated as various lens used to look at the 'act' which might lead to various interpretations of it and hence, results in different implications. With the change in trends in the use of 'terrorism', one particular interpretation can become more appropriate than the other/previous. It can be then asserted that the form and idea of 'terrorism' changes as 'instruments of violence' and communication and as the contexts evolve. (Schmid 21)

Before moving forward to the definitions that have evolved across time through various frameworks, it is important to first look at the core concept of 'terrorism'- terror. Terror at the first instance can be seen to be a state of mind occupied with an intense fear or threat. And terrorism on the other hand is an 'activity, method or tactic' that aims to produce 'terror' as a psychological outcome of the performed act. (Schmid 67) A study conducted in the mid- 1970s by the US Department of Justice stated that Terror is a natural phenomenon; terrorism is the conscious exploitation of it. Terrorism is coercive, designed to manipulate the will of its victims and its larger audience. The great degree of fear is generated by the crime's very nature, by the

manner of its perpetration, or by its senselessness, wantonness, or callous indifference to human life. This terrible fear is the source of the terrorist's power and communicates his challenge to society. (US Nat. report)

Psychologically, 'terror' is something that is a strongly 'felt' emotional reaction to some act of violence that leads to experiencing fear or anxiety. Silberstein (a physician) describes the 'feeling of terror' as-

Terror is a state of intense fear induced by the systematic threat of imprisonment, mutilation, or death. It is intensified when the victim is helpless in the hands of another human being. We are all afraid of being hurt or killed. The terrorist manipulates persons and governments by making the threat of bodily harm manifest. The terrorist threatens the most fundamental human drive – the will to survive intact. He or she strips from the defences of human courage that most important element of antifear, the real or supposed ability to fight back to defend one's person. Because the terrorist's victims are unarmed, non-combatant, and random and because they are totally helpless, the victim's fear is experienced by all observers of the victim's plight, who are equally vulnerable and who desire to live their lives unmolested. These secondary victims of terrorism, all who think by association that their lives are in equal danger, fear equally for their persons. (Silverstein 51)

Apart from psychological effects of the induced terror by an act of terrorism, the act has several other connotations. As mentioned before, these acts of terror can be looked at from various frameworks which assert that these acts are also used as instruments for communication, political propaganda, resistance, etc. The idea of terror is continuously evolving one and its connotations are wide ranged. The word 'terrorism' is an extremely politicized term which is often used as a 'label' for a given kind of political violence which when 'sticks' with a negative connotation on the political opponent, might end up delegitimizing their conduct. Author Philip Herbst puts that-

Carrying enormous emotional freight, terrorism is often used to define reality in order to place one's own group on a high moral plane, condemn the enemy, rally members around a cause, silence or shape policy debate, and achieve a wide variety of agendas. Terrorist became the mantra of our time, carrying a similar negative charge as communist once did. Like that word, it tends to divide the world simplistically into those who are assigned the stigma and those who believe themselves above it. Conveying criminality, illegitimacy, and even madness, the application of terrorist shuts the door to discussion about the stigmatized group or with them, while reinforcing the righteousness of the labellers, justifying their agendas and mobilizing their response. (Herbst 164).

Terrorism essentially is a 'contested concept'. But if one looks at the word terror and terrorism

etymologically, the original historical meanings might seem to be relatively straightforward. The word 'terror' can be traced to its Latin root *terrere* which meant 'bring someone to tremble through great fear'. (Petschenig 492) It generally referred to one's psychological state of mind for quite some centuries in history. The political relevance of the word was observed for the first time during the French Revolution. Thorup noted this peculiar change in referred meanings that were brought about by the revolutionary activities in France in the late eighteenth century and wrote-

The French Revolution signals a shift in conceptual meaning in two tempi. First, we have the 'Robespieran moment', meaning here giving the concept of terror a futuristic element, separating the concept from its unqualified meaning of fear and its quasi-political meaning of policing, ordinary or extraordinary, and merging it with ideas of virtue and creation. Second, we have the 'anti-Robespieran moment' separating the concept from the (regular or legitimate) state and monopolizing it among illegitimate states (despotisms) and private actors (terrorists). (Thorup)

Schmid proposes certain elements that have stood the test of both time and scrutiny by scholars when it comes to problems regarding defining terrorism and he proposes to include them to be kept in the background while revising the academic consensus of the definition. First of all, the evident 'dual character' of terrorism has to be considered given its background of being a 'contested concept'. The popular idea of terrorism being affiliated to some 'ideology' at times goes too far to a diverse population of practitioners resulting in internal conflicts. The second element that he talks about is the idea of 'threefold context'. It has been observed that throughout the history of practicing terrorism, it has been used in three different contexts- "1. As a form of rule by fear, 2. As a continuation of protest and propaganda by other means, and 3. As a form of irregular warfare indiscriminate atrocities against civilians and non-combatants are conducted either as a form of punishment against the civilian population". The perpetrator is seen as the main source or agent of initiating and executing violence. Terrorism is political is what he says in his fourth element though the term 'political' is debatable. The widely acclaimed notion of terrorism being 'political' and not merely 'psychotic' or 'criminal' problematizes the definitions of the other terms as well and raises questions on the reach of these terms. Terrorism is a 'violent act' but the mode, spread and impact of the violence cannot be determined and has to be re-visited. Simply put, the violent act is to threaten people that serves the aim of the perpetrator group to intimidate, impress and coerce the third parties that are directly or indirectly linked to the victims. Dave Grossman writes-

One of the most obvious and blatant benefits of atrocity is that it quite simply scares the hell out of people. The raw horror and savagery of those who murder and abuse cause people to flee, hide, and defend themselves feebly, and often their victims respond with mute passivity. (Grossman

100)

The act of violence committed by the terrorist is always used as an element of communication that Schmid points out as ‘threat-based communication’. The conditional killings (do this or...) can be seen as an example of this. Further, the point that sets terrorism apart from any other form of violence is the differentiating between the direct civilian victims and the ultimate target audience. Finally, fear, intent and asserting campaign are the last three elements that Schmid proposes.

The problems regarding defining ‘terrorism’ have been discussed by several scholars. Boaz Ganor, a political scientist specialized in the field of counter-terrorism responded to a questionnaire by Alex Schmid about the problems in defining ‘terrorism’ where he presented a long list of reasons that pose as a problem for defining ‘terrorism’. It starts with how terrorism is a ‘contested’ concept that is supposed to be looked at from various disciplinary as well as contextual lenses which broadens the area of specification and hence, defining becomes a problem.

The second reason is that, it is linked to institutional ‘(de-)legitimization and criminalization’ that refers to the power politics involved in the intent of defining. The third reason is that the types of terrorisms categorically differ in their forms and the kinds of manifestations that they intent. In fact, categorising terrorism into types itself is a problematic idea because of the interconnectedness of the problem. The fourth reason that Ganor presents is the problem of how the meaning of the word has constantly been changing and evolving in its more than 200 years of existence which is further subjected to change given the current trends. The fifth reason is the terrorist organisations are ‘(semi-)clandestine’ and are ‘surrounded by secrecy’ that makes its objective analysis difficult. Sixth, that the definition depends on the definition of the ‘terrorist’ which again is context specific. The definition of a terrorist primarily depends on whether they ‘terrorists’ work for or against their own ‘(national) interests’, and hence, double standards regarding the motive have to be continually applied’. Therefore, this dilemma of segregating motives poses a problem for defining.

Next, it shares certain aspects with other forms of political violence like guerrilla warfare, assassinations, etc. and hence, the boundaries are unclear. There can be instances where the defining hierarchy can ‘mis’-use power to define where the state with its ‘claimed’ monopoly can use its power to exclude its own forceful activities (like indiscriminate repression, etc.) from the ‘claiming’ legally defining definition posing a difficult moral position. It is linked to a debate of who is responsible for starting a downward spiral of ‘action-reaction’ violence making the discussion about the ‘root’ cause its centre of focus. Various scholars use various terms which makes defining difficult (like force or violence; terror or terrorism) for both state and non-state actors. Along with the differences in the approach of scholars, the various conceptual and

normative frameworks differ at their approach (like the criminal justice model, war model, etc.).

The discussion of terrorism is linked to issues like armed resistance against any forced foreign occupation on the native's land, racist regimes, etc bringing the notion on "one man's terrorist is other man's freedom fighter". The participants and stakeholders involved in the acts of terrorism are also engaged in several 'legitimate forms' of armed conflicts or party politics. Followed by the fact that the violence committed by the terrorists could be just as indiscriminate, if not more so, as that perpetrated by those labelled as 'terrorists'. And hence, assessment of the act of terrorism is associated with the discussion of the status and the goals of the actor which creates a problematic position. (Ganor 157) These wide-ranged reasons pose a problem in defining the perpetrator as a terrorist which I will be using later to evaluate Phoolan Devi's case of her being a conundrum of terrorism vs justice.

Now, the counter-topic that goes hand-in-hand with the concept of terrorism is the idea of resistance. Resistance is something that is looked at as both, motive for terrorism and as terrorism itself depending upon the hierarchy of defining. Starting off, the ideas of 'resistance', 'terrorism' etc. gained their momentum from its root idea of 'revolution' from the time of French Revolution. And the modern ideals of these terms can be seen to have gained their momentum in the phenomenon of violent revolution appeared to have played a relatively minor role in post-Cold War politics, leading some to believe that a model of democratic transition achieved through nonviolent action and political negotiation was the new norm that should and could be followed by all countries. And hence, during the same time period, 'terrorist' violence perpetrated by groups dedicated to religiously motivated goals found little or no sympathy among people committed to liberal, democratic politics. Since, the violent revolutionary ideals lost their popularity and 'democratic' institutions rose to prominence, the political minority was left to be categorised for defining by the ruling institutions. These ways of looking at terrorists underwent a major change again after 9/11 attack and then further got more academically politicised post 2011.

Armed Resistance

Armed groups who declare their goals to be freedom, democracy, and self-determination, and their purpose to be "resistance against oppression," have frequently provoked a deeply conflicted moral reaction from human rights observers. This is reflected in the widespread sense of ambiguity over what to call them. The ambiguity of such decisions is well-known, as seen by the adage that one person's terrorist is another person's freedom warrior. The term "terrorist" has a delicate and ambiguous relationship with the concepts of justifiable armed resistance, rebellion, and revolution. The two categories are sometimes considered as mutually exclusive: either a group is engaged in legitimate armed resistance or it is a terrorist organisation. Others argue that there is no distinction between the two; rather, the various labels we use to describe approval or

disapproval represent a subjective attitude of acceptance or disapproval that is heavily influenced by context and perspective. (Garton Ash and Snyder 57) One thing that practically everyone agrees on is that the term "terrorist" is derogatory. But, just as there has long been debate over the appropriate way to define the phrase, there is also debate over what its "distinctive wrong" is (and, indeed, about whether or not it has one). Some emphasise the use of fear for political reasons, while others focus on the agent's standing, and occasionally it's attempted to be identified as a war waged for an immoral cause. (Waldon 157).

The first and most crucial step in resolving ambiguity and misunderstanding about "terrorist" violence is to fill a gap in normative political theory and war ethics by proposing a theory of lawful, armed, non-terrorist resistance to oppression. But there's a second concern that needs to be addressed, and it's that even if we did agree on a principled definition of what constitutes terrorism, we can't always assume that these more severe techniques are unjustified in what may be unusual circumstances. Many democratic individuals are familiar with the idea that terrorism, defined as the deliberate infliction of violence on the completely innocent, could be justifiable in exceptional situations (particularly since the Second World War). To allay this concern, we must ensure that the theory of justifiable armed resistance and revolution is capable of indicating as clearly as possible whether such exceptions are possible and, if so, what form they would take. Only by defining the nature and breadth of the exception in this way can people feel comfortable using the term "terrorist" to denounce with full negative force cases where these techniques are utilised without reason.

Oppression

Who doesn't believe that people have the right to resist their rulers in at least some social circumstances that are 'oppressive,' 'tyrannical,' or 'unjust'? No one, or at the very least, scarcely anyone, appears to be the solution.

Let us begin by defining 'resistance' as an attempt to subvert established governmental authority in a state by contesting its attempts to dominate and weakening its political power by measures other than those available to the state through its constitutionally required processes (in the courts, legislature, and so on). As such, it comprises both moderate forms aimed at challenging certain features of the state or a particular administration's authority and more radical ones aimed at fundamentally changing the state or forcing a government to resign. Resistance encompasses revolt and revolution at the far end of the spectrum. To define a right of resistance to injustice, we must first define what oppression is. Finlay presents four factors of oppression. When four features interact persistently as part of those relationships, oppression can be considered to be a property of social – political relationships, and to arise in many permutations deriving from the interactions of four features:

1. Domination- Domination means that some people are subjected to the arbitrary rule of others. This idea is frequently invoked in the republican tradition in the rhetoric of rejecting 'slavery,' which, as modern civic republicans point out, distinguishes their concern as being with 'non-domination,' rather than the weaker demand for 'non- interference,' which they associate with modern liberalism. (Lovett 37) Non- domination occurs when the 'direct' masters are not present and is incompatible with slavery; non-interference, on the other hand, is compatible with more benign kinds of dominance. However, liberals would reject non-domination as the right demand in the face of political power. As a result, they might accept that the evil to be fought is 'domination' rather than 'intervention' per se. Domination, of course, is linked to the evil of interference, because masters have complete control over their slaves. The presence of domination, on the other hand, is unaffected by whether or not the master decides to exercise this authority frequently or in what manner, as long as there is an agent whose status is defined by owning it. (Lovett 48).

Even if non-domination takes precedence, non-interference is crucial as well. Consider two possible outcomes of a state's political growth, both of which achieve non-domination to the same extent. If those two outcomes can fulfil their goals at different levels of citizen intervention, we should presumably favour the one that does so at a lower cost, all other things being equal. The relevance of non-interference, on the other hand, could be seen in terms of non-domination: the additional interference shown in the alternative conclusion is superfluous and thus arbitrary. As a result, it is a violation of non-dominational liberty.

2. Harm- In a morally neutral meaning, the term 'harm' refers to the deprivation of a person's well-being. Anthropogenic harm happens when someone is hurt directly as a result of an act of aggression that causes bodily harm, death, or pain. It can also happen when someone's prospects – in terms of longevity, health, opportunity, or comfort – are harmed, whether directly or indirectly as a result of others' actions or as a result of others' failure to take the necessary steps to protect people from such consequences through means that do not require unreasonable sacrifice on the part of interveners. It could also manifest as property damage or loss.

3. Discrimination- Harming others, whether intentionally or unintentionally, is frequently aided or caused by a distinction between 'socially salient' groups – whether defined as classes, races, genders, nations, or other ways - as a result of which one is socially disadvantaged in relation to the other. As Andrew Altman points out, part of the problem with discrimination is that it leads to "domination and oppression at the hands of [...] fellow citizens." We may perceive prejudice as producing vulnerability to arbitrary interference and injury in disadvantaged groups by the advantaged by contributing to uneven distributions of resources and authority. Discrimination, on the other hand, has a particular badness that is distinct from its results. Discrimination based on arbitrary grounds – being socially disadvantaged for reasons unrelated to one's moral decisions – is

referred to as 'treating humans as having a degraded moral status'. As a result, discrimination can both contribute to oppression by the forms of dominance and injury it exposes people to, as well as be a form of oppression in and of itself. (Altman23)

4. Injustice- Dominance, harm, or discrimination, as stated, are insufficient for a determination of 'oppression' in the broad meaning and to which justified opposition reacts. They must be unjust as well. Clearly, not all instances of injury are justifiable grounds for resistance. We may be damaged frequently and in a variety of ways that cannot be avoided. Alternatively, harm may be imposed in a variety of ways that are justified: we are subject to some harms, for example, as a method of compensating for other benefits to ourselves or others; we may even deserve some harms, such as those inflicted by properly constituted courts. (Finlay 21).

One cannot count any of these factors individually to consider them as a reason to raise for resistance, rather it has to be in permutations of these factors to be considered as oppression, or rather, be unjust in the first place and then cause any of the over three mentioned factors like- unjust domination, unjust harm or unjust discrimination. And these are considered to be legitimate reasons for resistance. To counter this oppression, resistance becomes the prima- face and often gets connected with the idea of revolution. And when, connected with the idea of revolution to free oneself from oppression, it becomes a legitimate tool to counter hierarchy.

Since, the base idea of resistance is based on the notion of countering hierarchy (domination), it becomes difficult to define it as a categorized concept with boundaries. This happens because the concept of definition itself lies in the hierarchal system which becomes the voice of the 'master'. But since, the discourse of 'resistance' comes from the 'oppressed', i.e. from the lower levels of hierarchy that is ambitious of overthrowing it, the dialect of defining it is lost.

Therefore, both the concepts 'terrorism' and 'resistance' do not have set boundaries when it comes to defining them. Legally, 'terrorism' can be defined in context of the time and criminal laws of a state but 'resistance' as a concept has no legitimate space in the legal discourse. Further, interpretation of the concepts depends on contextual basis.

The current research will be evaluating these ideas of defining terrorism and resistance through the case study of Phoolan Devi. I would be now evaluating her case with the existing laws and ideas of these concepts and then look at the narrative that is created by the popular media and hence, it is mostly going to be secondary research that would be qualitative and would focus on narratology.

Phoolan Devi: The Conundrum of Terrorism v/s Justice

Phoolan Devi, an Indian bandit and politician (August 10, 1963, Uttar Pradesh, India—July 25,

2001, New Delhi, India), was known as the "Bandit Queen" for her acts of vengeance against those who had wronged her as well as her Robin Hood-like endeavours aid the lower classes. She later became a member of the Lok Sabha, Parliament's lower chamber and continued to advocate for the impoverished and oppressed. The popularly acclaimed story of her life was a blend of reality and folklore, starting with her arranged marriage to a man three times her age when she was 11 years old.

She returned home a year later, after being brutally treated by her husband and her father-in-law. By the time she was in her early twenties, she was kidnapped by a group of dacoits (bandits) after she was sexually abused by the upper-caste landlords- the Thakurs, in the village of Behmai and became the mistress of the dacoit leader. Devi organized the Saint Valentine's Day massacre on Feb. 14, 1981, in which 20 of Behmai's Thakurs were picked up and shot in retaliation for her gang rape.

This act heightened her stature in modern myth as well as the police hunt for her. Devi negotiated her surrender in 1983 after being in exile for at least two years with the help and support of the people of her community. She was imprisoned for eleven years and contested for election in 1996 and became a Member of Parliament from the Samajwadi Party. She was later killed in 2001 when an assassin had open fired outside her home.

Comparison with Terrorism

The act of mass killing of 22 men in broad day-light in Behmai led to a huge uproar across the country. A police hunt was ordered for Devi after the incident but she managed to escape and stay in exile.

Going by the previously discussed legal definitions of 'terrorism', an act such as this qualifies to be an act of terrorism from a number of levels. This act of violence can be seen as a criminal and political at the same time which makes it 'a political crime or a criminal offence with political repercussions'. It can be evaluated as a 'propagandist communication stunt' to impress a section of people while offending the other. (Smith, 2) This can be seen as a specific mix of violence and communication in which the immediate victims are frequently civilians and the primary audience of the "language of blood" is frequently a government or its citizens of the oppressive group who the perpetrator wants to contest.

This act of mass-killing can be evaluated from several points of academic consensus to determine if this was an act of terrorism or not-

Three-Fold Context

Terrorism has been used in a number of circumstances throughout the history, dating back to 1793. While it has always been a violent and unlawful means to an end (positive power consequence, short- or long-term goal achievement), it has been used in three distinct (though often overlapping) settings.

1. as a kind of fear-based authority, such as when a repressive and illegitimate political regime uses extra-legal terror to impose conformity, obedience, and non-resistance;
2. when a group attempts to call the public's attention to a real or alleged injustice or disrupt public order, or when it utilizes armed agitation in an attempt to generate a revolutionary scenario but not yet capable of much more than occasional acts of 'exemplary violence';
3. as a form of irregular warfare in which indiscriminate atrocities against civilians and non-combatants are carried out either as a form of punishment against civilians who may be hosting members of an armed resistance group, or as part of asymmetric and psychological warfare, often alongside guerrilla warfare or regular warfare, in order to create deterrence and compliance. (Smith 77)

Devi's act of killing these men had created a sense of terror among the people of the Chambal region where the upper-caste section of the society exerted a sense of authority over the lower-caste section. The prior committed crimes like kidnappings, looting and followed by this established a certain authority of the dacoit gang over the people of the region. The propagated idea of Devi's killing of these men as an act of revenge of her alleged rape serves an explanation for the second point where the alleged injustice served to Devi was used as a 'motivating' reason hence, drawing attention to the problem. The targets here were symbolic civilians who represented the section of the society that casted the atrocities. The idea of the state getting involved as a motivation to carry these act stands seated in this case but the notion of the state can be replaced with the presence of the oppressive upper-caste. This also created a psychological fear among the people where the spectators were terrorized to not oppose the perpetrator (here, Devi) irrespective of the caste they belonged to.

Threat Based Communication

It's debatable if a single act of violence can establish a fearful environment. At the very least, a fear of recurrence, if not a full-fledged terrorist attack campaign, is required to convey the desired (but false because exaggerated) message that terrorists can strike anyone, anywhere, at any moment. This can occur in the case of kidnapping victims or hostages seized as part of a hijacking (dual-phase occurrences), or it can occur in the case of single-phase incidents such as assassinations (e.g., through the posting of 'death lists' of persons to be targeted for

slaughter). The threat or use of abrupt, sometimes selected but frequently indiscriminate, life-threatening violence has an intimidating quality to it, and as a result, it can generate existential terror in members of the general population who identify with recent victims or fear becoming victims in the near future. The terrorist's target audience has some type of relationship with the victims, a relationship that is (re-)activated by the victimization. (Schmid 79)

Devi had an image of a notorious dacoits of the region who was feared by many. She had gained power by carrying out several kidnappings and assassinations along with Vikram Mallah (a member of the gang) and later with Man Singh. The later formed Devi's new gang carried out several violent raids and robberies in Bundelkhand, primarily targeting upper-castepeople (though not exclusively). Therefore, the perpetrator here had created an image of 'terror' figure among the people.

Devi came to the area to seek vengeance months after her escape from Behmai where she demanded the arrest of her tormentors "Sri Ram" and "Lala Ram." When the two men were not found, they gathered all of the village's 22 young men and lined them up in front of a well. They were then marched to the river in a line and were killed. These victims were hence, symbolic of the actual intended victims and this incident acted as a means to communicate the idea that the people of the same interest group as the victims could be attacked later. It is clearcase where the direct victim of the violence is different from the target.

Terrorists frequently do not distinguish between lawful combatants and innocent non-combatants; they regard everyone as part of the enemy camp, as they consider everybody as either part of the issue or part of the solution. The eventual target group becomes more despondent (but also more outraged) as a result of this.

Intent and Creating Dread through Violence/Crimes committed

The purpose of the act of violence (or a series of such acts) is to elicit a psychological response – severe anxiety or panic – that is out of proportion to the physical outcome. The terrorist tries to impress/affect the public by his ruthlessness, cruelty, the excessive destructiveness of the act of violence, the element of surprise, the presence of many onlookers, or a combination of these or similar elements meant to create – and then coercively exploit – shock, exaggerated fear, and, if repeated, a climate of terror in audiences beyond the direct victims and witnesses. The secondary victims' levels of terror vary depending on their spatial and emotional distance from the initial victim, and can range from fright to worry to despair. That, however, only applies to individuals who identify with a terrorist victim. Those who sympathize with a terrorist perpetrator and/or have reason to despise the victim may experience a range of emotions, from pleasure to elation ('revenge has finally been exacted').

This act of Devi managed to make the people of her community gain support from her and her gang who carried out several proceedings like this. The community that had experienced the wrath of the upper-caste Thakurs of the region came to be closely knit in support of the perpetrators of Devi and on the other hand the victims and the people who identified with the victims looked at themselves as future potential targets and hence, the 'terrorizing' affect was created.

Terrorist acts appear to be meant to 'terrorize' a target group and, secondarily, to exploit insecurity produced by the public's fear. They also make good use of the attention generated by the violent act (or threats of violence, assuming the 'credibility' for violence is established). Terrorists claim a place in the political arena and want to influence the political agenda with their actions. Hence, with this idea Phoolan Devi comes to make a political presence of her stand.

The case of Phoolan Devi ticks of three major categories of it being a terrorist activity according to the then existing laws (the definitions prescribed by the state)- (1) it being a criminal offence, (2) the act being an act of politics and (3) the act being as a medium of communication.

For instance, if we consider, the then existing/enforced definition of 'terrorism' in India, this case of Behmai massacre is something that would fall under it. The Indian National Security Guard Act, 1986, defines a 'Terrorist' as: "Terrorist means any person who with intent to overawe the Government as by law established or to strike terror in the people or any section of the people, does any act or thing by using bomb, dynamite or other explosive substance or inflammable substances or firearms or other lethal weapons or poisons or noxious gases or other substances (whether biological or otherwise) of a hazardous nature, in such a manner as to cause or as is likely to cause, death or injuries to any person or persons or damage to or destruction of property, or disruption of any supplies or services essential to the life of community."

Section 3(1) of the Terrorist and Disruptive Activities (Prevention) Act, 1985, (TADA) does not define who a "terrorist" is but defines a "terrorist" act as : "Whoever with intent to overawe the Government as by law established or to strike terror in the people or any section of people or alienate any section of the people or to adversely affect the harmony amongst different sections of the people does any act or thing by using bombs, dynamite or other explosive substances or inflammable substances or firearms or other lethal weapons or poisons or noxious gases or other chemicals or any other substances (whether biological or otherwise) of a hazardous nature in such manner as to cause, or as is likely to cause, death of, or injuries to, any person or persons or damage to, or destruction of property or disruption of any supplies or services essential to the life of the community, commits a terrorist act".

The Behmai massacre had a ruling intent behind the killing which did strike terror and caused

death of people by using lethal weapons. It sought to alienate and target one section of society and the act committed was also recognised as an act of crime under various Sections of the Indian Penal Code.

Phoolan Devi as figure of Resistance

Phoolan Devi's committed act from the lens of the laws defined by the state can be looked at as an act of terrorism according to the then enforced laws on the same. But if we look at the popularly acclaimed image of Phoolan Devi among the people of the region it comes out to be of a resistor than a terrorist. This section would evaluate her image to that of a resistor by looking at her committed act of crime from the lens of her personal history of oppression and lack of access to justice as a reason to commit the mass killing of 22 Thakur men of Behmai.

Her idea of being a figure of resistance can be equated with two major points- her personal oppression being justified to present her 'right to resist' and her lack of access to justice as a justified reason of taking up arms. Finlay's four factors of oppression can be clearly identified in the case of Devi's personal life in significant permutations which define her personal oppression.

Starting with domination, Devi due to the caste politics and poverty of her family was always under an arbitrary rule of a master. The 'master' here, in fact several masters coming in terms of social and economic hierarchy. Belonging to the 'mallah' community socially dominated over her position where she was systematically taught to 'obey' the Thakurs of the by her parents and be oppressed by them. She was told by her father to obey the upper-caste elders of their village and do what ever they asked them to do without asking questions or favours in return. (Rambali 236) She and her family were economically dominated by her uncle who was a Dalit but was rich. Her uncle and his son exploited their family through domination by first not letting to sell their tree for money and later sold the tree without their consent. She was further socially dominated by her husband and her father-in-law after marriage. Devi was also dominated by the state for not counting on her 'voice' when she had approached the police (the state's representative) who further dominated her by 'harm'.

Harm- The notion of physical harm had continuously been a factor throughout her life where the people who dominated and exercised power over her. Devi and her sisters were beaten up by the upper-caste villagers if they did not obey them or refused to act according to their wishes. She was beaten by her uncle and her cousin for not abiding by their orders of selling the tree. The social domination also happened by not just beatings but also rape which is to be counted under this section of 'harm'. Her rape by her husband, the police, the Thakurs of her village and the dacoits of the Bandit group are all to be considered to be as pointers of harm that direct towards the notion of 'oppression'.

Discrimination had been written in the fate of Devi by her birth. Being born as a female in the 'mallah' caste, brought discrimination right from her birth where she was assigned a particular position in the society that happened to be the lowest one in the hierarchy ladder.

All the above-mentioned factors in the life of Devi's oppression are coupled up with injustice. The unjust domination, unjust harm caused to her and the unjust discrimination that she had faced throughout make her stand point of being 'oppressed' clear. And this makes her a potential figure of resistance to counter the hierarchy. It can also be equated with the lack of access to justice in the case of Devi. Justice is a state-regulated entity that had been systematically denied to her. There also, is a question of if she had approached the judiciary with the discrimination, she had faced by the dominators for the harm they had caused, the laws were not well equipped to save her from the oppression that she was facing.

The popular acclaimed image of Phoolan Devi as a resistor presents her committed crimes in the light of the oppressive crimes committed to her by the people in power, where her rape by her husband, by the policemen and the Thakur men of the village and the dacoits are highlighted. Now, if we consider it to be the reason behind the mass killing, then it stands justified because she would not (in the eyes of law- i.e., the state) get justice even if she had approached them.

The Indian Penal Code was enforced in India in 1863 and the rape laws were revised as late as in 1983. Devi was oppressed by several people as discussed above who held several power and stand positions- from her family, neighbours, authorities to dacoits. First, Phoolan was oppressed by her husband where he exercised his power over her by raping her. She could not approach the authorities because rape within a marriage was not recognised to be criminal.

The rape laws then enacted were according to the laws enforced in the year 1860-

A man is said to commit rape who, except on cases herein after excepted, has sexual intercourse with a woman under circumstances falling under any of the following five descriptions:

First: Against her will.

Second: Without her consent when she is insensible.

Thirdly: With her consent when her consent has been obtained by putting her in fear of death or of hurt.

Fourthly: With her consent, when the man knows her consent is given because she believes that he is a different man to whom he is, or believes herself to be married to.

Fifthly: With or without her consent, when she is under ten years of age. (Baxi 91-92)

The only exception was that it wouldn't be considered to be a rape if the victim was married to the perpetrator. Phoolan was married at the age of eleven and hence, could not approach the court for justice. In 1979, Phoolan was falsely accused by her cousin Mayadin for stealing some objects from their home and was arrested by the police. The police when in custody had raped Devi. Despite being raped she could not approach the judiciary for justice because, 1. the clause of custodial rape was not defined until 1983, 2. the statement of the inmate in jails were not considered in these cases and 3. the clause of rape depended on the victim denying before the crime being committed. Therefore, the rape in the eyes of the law did not occur at all. The two Thakur men, Lala Ram and Sri Ram held powerful positions in the village and had control over the authorities which was one reason of Devi not approaching the police and the second being her previous experience in the custody.

Hence, it can be seen as a clear case of repeated denial of justice which qualifies to be a 'fair' reason to take up arms in resistance against the continuous oppression faced by her. Rape on the contrary according to Devi in several instances is a secondary factor. She focuses on the oppression of the Mallah community by the Thakurs happens in a systematic way protected by the state by turning a blind eye towards the atrocities committed by the upper-caste community against the Dalits. And hence, the act of mass killing becomes a symbolic act of resistance against the prolonged oppression that the Dalits were subjected to.

The Bullet Raani- A helpless victim or Goddess 'Kaali'

The attempt to trace the 'truth' about Phoolan and describe her openly for middle-class audiences consuming the media texts is a recurring theme in the collection of English language print news pieces that work together to narrate Phoolan's life story. The need to label Phoolan Devi as a specific type of subject arises from the perplexity that her public appearance has caused. Consider this excerpt from a post-Phoolan Devi piece in an English-language daily which explicitly is referred with an image taken at the moment of Phoolan's surrender to the Indian state in 1983:

Is she a wild little girl, lost and afraid in the world to which her surrender has brought her? Or is she firming up her unsmiling mouth to take on another challenge? Or is she still immersed in the blood-revenge culture of the Chambal ravines? She fills the frame, yet does not dominate it. She is caught in a circle of eyes, fixed in other people's perceptions. And this is the space she inhabited till her death. (Chakravorty para.2)

To mark the perplexity that Phoolan's emergence into the mainstream Chakravorty implicitly references the multiple stories that had framed her life where she was sometimes seen as a "wild," "lost girl," and at other times she as a powerful agent, taking on one violent challenge

after another. Madhu Kishwar, a feminist activist, highlights the fascination and questions that marked her iconicity:

No political leader, no film star, no other celebrity has evoked the kind of curiosity and interest in the national and international media as Phoolan Devi. Who was she? A wronged and abused woman? A deadly dacoit? A shrewd manipulator? Or a Durga incarnate?... (para 2) While the idea of women's equality leaves most Indian men uncomfortable, they seem to relish and respect women who appear as Durgas. Thanks to the media's determined myth-making, Phoolan too was forced into the Durga-Chandi mould even though she does not actually fit the role. If we follow mythological lore a real Durga is one who remains unvanquished...her inviolability is what deifies her. Phoolan, unfortunately, was a much abused, battered and exploited person. Yes, she fought back. She tried retaliating with the same weapons as were used against her. And yet she moved from one exploitative situation to another. (Kishwar para 6)

As Kishwar points out, Phoolan Devi was a source of fascination for the media, and reports about her alternated between portraying her in a mythic form, analogous to Durga or Kali inflicting vengeance, and portraying her as a 'wronged and abused lady.' For Kishwar, it is precisely this double act - defining herself as a violent agent at times and an abject lady at other times - that causes difficulty. By separating reality from fiction, uncovering the 'real' Phoolan Devi, and then dissecting her for its audience, news commentary on her life story (particularly the studies written after her death) attempts to handle the concerns her figure had raised. She suggests that there is a 'real' Durga and a 'real' Phoolan Devi present and tries to distinguish both of them, while claiming that the media attempted to make equivalences between Phoolan and Durga. Second (and related to her first argument), she claims that the tale of Durga (or Kali) is a male obsession, but interestingly enough, she interprets Durga as an inviolable (and hence possibly virginal) figure using the male gaze. The 'real' Phoolan, according to Kishwar, was not a 'real' Durga since she was and remained a 'violated' figure. As a result, the "abused, bruised, and exploited" Phoolan Devi emerges as a symbol of abjection in this tale.

The life story of Phoolan Devi is then explained utilizing a cause-and-effect method. Brutalized by violence, Phoolan turned to violence, according to these explanations. The Hindu's editorial, which was prominently featured at the introduction of the issue, states that the presence of many stories necessitates an explanation: Phoolan must be clarified for the readership of the editorial. Second, it distinguishes between 'real' or 'factual' stories and 'fictive' or 'mythic' stories, and it is concerned with portraying the 'truth' about Phoolan Devi. In her obituary for Phoolan, Kishwar observed that "the plethora of journalistic stories" on her life were perplexing exactly because they were "coloured" (Kishwar para.2). In other words, Kishwar claims that many of the journalistic depictions of Phoolan's life are based on fiction and bias. Here,

The Hindu, which is known for its investigative journalism and is viewed as a serious news agency concerned with important political, social, and economic issues, thus apparently seeks to strip the story of "romantic fantasy" and myth and unveil the "true" Phoolan Devi. Other accounts are dismissed, and the biography is accepted as the "truth" and used to explain Phoolan to its readers. The editorial manages the confusion caused by Phoolan's iconicity by employing the rape-revenge formula. The editorial is one of many disparate journalistic accounts, with headlines like "A Bullet-Riddled Biography" (Biswas Outlook), "Legends of Wronged Women" (Chakraborty, The Telegraph), and "A Life Less Ordinary" (Khan, The Indian Express), all of which work to define Phoolan as a "victim of caste oppression and gender exploitation who fought back first by resorting to gory revenge and plain" (Frontline magazine). Outlook magazine's cover story put it even more succinctly: "It's possible that the real Phoolan never stood up. At about 5 feet tall, this ravine rebel was essentially a sharp-tongued aggrieved woman" (53). In other words, the perplexity engendered by Phoolan Devi's mainstreaming - a sense of unease engendered by the media's myth-making machine having to "uncreate" its own myths - was managed by articulating a desire to return to "facts" and, as a result, by defining Phoolan as an oppressed woman who "lived by the gun and, in the end, died by it" (Khan, Indian Express). As a result, the news media attempted to force transparency on Phoolan Devi. Using the conceptual tool of "dominative imposition of transparency" to think about stories like the ones stated above (Brooks 8). By categorizing Phoolan first as a mythic figure and then as an abject body - a body that has been degraded and exploited to the point where it lacks any dignity and as such can be consumed, albeit sympathetically, by the middleclasses through the mediation of media texts - makes visible the hegemonic processes through which Phoolan is made 'transparent.' As a result, the term abject is used here to describe the mechanisms via which Phoolan is staged as a degraded body, and hence as the 'other' among the audiences who consume media texts.

Phoolan Devi is made visible and legible through narrow representational frames that render her as an oppressed body, and as such, her body marks the boundary between modern, secular, cosmopolitan India that lives in bustling cities and the primitive villages and towns of the country where caste and sexism are seen to be burgeoning. Interpellation is used to impose transparency, with Phoolan being referred to as the "Bandit Queen" or as the Kali figure, an untamed, naive animal-woman who was brutalized and desired terrible vengeance. In this way, the quest to understand Phoolan Devi reveals more about the hegemonic social construction that was forming during her lifetime than about Phoolan herself.

The journalist who had written several pieces about Phoolan Devi sets out to re-discover the Chambal ravines after her death in 2001 in this excerpt from an Indian Express essay titled "In Search of Phoolan." The ravines of Phoolan were unlike anything the reader of this essay has

ever seen - they were untamed, badlands where bandits roamed like wild beasts "tormenting the villages" that existed on its "margins" (Thakur). The writer follows the animal metaphor to its logical (though frequently unspoken) conclusion, changing the bandit into a consumer item. If a person out of the Chambal context/background reads essay, their imagination could turn these ravines - with their wild and exotic beauty and the idea of a Bandit in a safari would be exoticised. The analogy between a bandit such as Phoolan and a wild animal is unmistakable. As a wild animal-woman, Phoolan Devi here stands interpellated.

Reading I, Phoolan Devi

The title *I, Phoolan Devi* invokes and implicates itself in the controversial debates that still surround Guatemalan Indian organizer Rigoberta Menchu's mediated testimony; also originally published in France, and which has been read variously as resistance literature as well as an example of first world production, exoticization, and commodification of cultural Otherness (Carr 156). The testimonial's editors, for example, used the oral history technique of the monologic interview, in which the narrator recorded her account on tape, which was then transcribed and edited with her agreement at every stage of production, according to a publisher's remark. The text, which is produced in a genre defined by the subaltern's act of "giving witness to the 'truth' of her oppression, to a less oppressed other" (Spivak 7), demonstrates how the practice of translation – linguistic, cultural, and ideological – in the name of global and multicultural solidarity is underwritten by power differentials that construct the gendered and caste-marked subaltern in that.

When interpreted as a transnational work that allows Phoolan to perform her selfhood, *I, Phoolan Devi* is a textual space (stage) that allows Phoolan to perform her selfhood. As a result, the autobiography - a literature that promises to convey the 'truth' about a subject by definition

- does not provide simple answers to its reader; rather, it presents them with contradictions. Was Phoolan Devi a rational, self-aware assassin seeking vengeance using the only means at her disposal? Or was she just a pawn in the hands of the guys who surrounded her, who used, exploited, and viciously mistreated her? Such issues are still present in the autobiography. Because it opposes the imposition of transparency on the subaltern and displays the junction of the different ideologies that make up the subject, ambivalence can be beneficial. Within this mode, *I, Phoolan Devi* thus emerges as an ambiguous work - what Brooks has referred to as a "black point of possibility" (8) - that engenders ambivalence, prompting the reader to rethink established concepts of identity and the essential self. Such opacity, according to Brooks, "calls attention to the skill of the performer who, through gestures and speech [...] is able to confound and shatter standard notions of the racialized and gendered body" (8). Now, looking at the book from the idea of it being as an opaque text that confounds the reader hoping to unearth the "truth" about

Phoolan Devi through her autobiography, using the concept of "opacity" as a conceptual lever. I, Phoolan Devi, perplexes the reader since it is a text full of contradictions: Phoolan Devi emerges as both a resisting agent aware of the axes of power that oppress her and an irrational woman incapable of comprehending the power structures that restrain her. Because it opposes the static and inflexible identification markers of caste and gender that governed Phoolan's life, this confusion is a "dark point of possibility," revealing the insufficiency of the representational categories into which she was interpellated. Furthermore, it displays Phoolan's subjective involvement or identification in a variety of – even opposing – subject viewpoints. On similar lines, Ramamurthy argues that the subject's contradictions or confusion are theoretically significant for feminism since it forces feminist scholars to realize "personal experiences as socially produced, linguistically contained, and never purely individual in scale" (525). Perplexity can be defined as resistive by labeling it when it appears in *I, Phoolan Devi* as opacity. The goal is to use it as a constructive frame that will animate our research of contemporary India - its culture and politics - rather than to resolve the contradictions and ambivalences, as most portrayals of Phoolan Devi strive to do, or even to describe and step away from it.

Now, going back to the idea of Devi being an abject or a subject body, let us consider-

[...] then he unbuttoned my blouse and touched my chest. He had squeezed my ribs and giggled. The look in his eyes had scared me, but it wasn't my fault that he had stared at my chest and touched me. I had tried to get away from him [...] after my big sister's wedding it had been a while before she went to her husband's village. He never threatened to beat her, he protected her [...] my husband smelled of sweat and he made a funny noise with his mouth whenever he saw me [...] (Rambali 2)

As demonstrated by the excerpt above, the autobiography begins with a vivid depiction of rape. Phoolan is described as a child bride who is raped by her husband in the prologue (a much older man). When prioritizing the voice of the publisher, beginning the autobiography with the horrors of child marriage and rape allows the reader to easily and familiarly read the categorization of the rural Third World (for the urban India and the First World consumers) as a savage, uncivilized, irrational space where such practices persist as pre-modern traditions. This classification might be criticized as a one-dimensional, Orientalist creation of the Third World as the "other" of the First World, and the rural as the "other" of the urban Third World. As a result, the autobiography, like Phoolan's journalistic stories, images, and biographic video, attempts to provide the reader a "real" understanding of the horrors of subalternity. It ostensibly defines the subaltern lady as a wretched body. Unlike earlier depictions of Phoolan Devi, however, the autobiography does more than designate her as abject: it also reads as Phoolan testifying to her oppression and enacting a conscious self that was already established even when she was a child, when the reading emphasizes her voice.

I decided that when they came back, I would stay near the old man from then on. I would go with him to the well, so that his son wouldn't be able to touch me again. I would wear my skirt and my petticoat as well as my blouse and wrap my sari over that, and then tie it so tightly he wouldn't be able to undo it. I didn't even know him, he wasn't even one of my family, and he was trying to frighten me! (Rambali 3)

Phoolan creates self-awareness and consciousness through her performative recollections. The narrative covers Phoolan's resistance and tactics to combat the tyranny she suffered shortly after the literature showed her as an abject body (she decided, the text notes, to spend time with her father-in-law who appeared to be a sympathetic figure and began to wear her clothes in a manner that would make it difficult for her husband to force himself on her). Furthermore, the young Phoolan is shown to be enraged; she couldn't comprehend how a man she didn't know and who wasn't a family member could try to scare her. This Phoolan Devi isn't a pitiful character. Indeed, the reader is confronted with this defiant voice at the end of the first chapter:

[...] The poor must bow down and touch the feet of the rich. The poor eat a few grains of millet while the rich feast on mangoes. The pain of hunger in the belly of the poor produces fear and submission. I tried to submit, as my father said I should, but I was unable. I was like my mother. There was too much anger in me. (Rambali 21)

As a result, the reader of the autobiography finds Phoolan Devi not just as an abject victim, but also as an enraged subaltern woman who strategizes her resistance to the persecution she suffers on a daily basis. An easy interpretation of the autobiography as a reflection of an essential self is shattered when both readings are combined. As a result, the language is opaque; it does not depict Phoolan's life experience in such a way that the reader can grasp the "truth," but rather creates ambivalence.

Phoolan Devi thus, on the other hand, raises more questions than answers. Was Phoolan a *baghi*, a rebel, who stood up to the injustices she faced? Or was she just a pawn in the hands of her oppressors and circumstances she'd never be able to comprehend? As these lines from the book reveal, one reading of *I, Phoolan Devi* emphasizes a sort of resistance that was both conscious and deliberate:

I was discovering piece by painful piece how my world was put together: the power of men, the power of privileged castes, the power of might. I didn't think of what I was doing as rebellion; it was the only means I had of getting justice. But it was then that my rebellion began, when I was fourteen or fifteen years old and struggling to survive by any means I could. I was a woman who belonged to a lowly caste. Faced with power and rupees, I used any trick I could. I encouraged the other girls to sabotage the crops if the landowner wouldn't pay us. I reminded the landowners

that we were the ones who ploughed their fields, we spread the manure, we sowed the seeds and gathered the harvest, and they had to pay for our backbone and sweat. I warned those who refused to pay what we asked that they would see nothing growing on their land the next season. (Rambali 144)

"The power of men, the power of favored castes, the strength of might," Phoolan performs a knowledge of the specific nature of the persecution she has endured her entire life. These lines frame her actions as "rebellion" (a political rebellion) when she was fourteen or fifteen years old, while also pointing to the adulthood framing of childhood actions by the performative mode of autobiographical narration: "I didn't think of what I was doing as rebellion [...] but it was then that my rebellion began." Through these words, she emerges as a thinking actor: she was able to mobilize other girls like her to defy the landlord's oppression by using "every trick in the book." Phoolan Devi's rage becomes political when she threatens the landlord that if he does not compensate the workers who actually ploughed, planted, and reaped the land, his fields will become barren. However, Phoolan's actions are staged as irrational in other parts of the text, her intellect lacking the nuanced knowledge of oppressive socio-economic mechanisms exhibited in the words above. The metaphor, notably animal metaphors, is the linguistic device that consciously stages Phoolan in this fashion. Phoolan is characterized as a "little pigeon" (1, 3), a "wild animal, sick, agitated, and violent" (473), and a "frightened cat" (460). She can automatically "smell out" (457) danger and will flee into the "forest" if she detects danger. Phoolan is a primitive as an animal, isolated from civilization in her "forest world." More crucially, Phoolan Devi as an animal can react to the situations she finds herself in, and she can even chafe and oppose the repressive institutions that torture her, but she is unable to fully comprehend the power networks that encircle her. This is also how the film *Bandit Queen* describes the character as well.

Reading the film "The Bandit Queen" (1994)

Her life explored in the 1994 film by Shekhar Kapoor *The Bandit Queen* which is based on Mala Sen's biography, can be classified as a tragicomedy. Phoolan Devi is depicted as a low-caste, illiterate, and uneducated country lady who can only communicate through raw emotions and physical violence. As a result, she has little choice but to react to the forces that are closing in on her, frequently without the benefit of logic or reason. As the film professes to recount the 'actual narrative' of India's Bandit Queen, the idea of Phoolan as a child or as an innocent but imprisoned animal becomes a recurring trope.

Representations of Phoolan's early life, such as Shekhar Kapur's critically praised 1994 film *Bandit Queen*, have tended to emphasize on rape and sexual violence as the only basis for the protagonist's reinvention as an avenging bandit. Phoolan's protests against poverty and caste

exploitation in the rural economy, particularly in relation to land ownership and bonded agricultural labour, are subordinated in Kapur's narrative to her personal vendetta against the Thakurs of Behmai as retribution for the murder of her lover, Vikram Mallah, and her subsequent loss of "honour" to upper caste men (Gopal 292–330; Kishwar 34–37; Roy, "Rape-Trick I" np) In doing so, the film not only incorporates Phoolan's resistance into a heteropatriarchal script, but it also elides perceptions of the dacoit or armed bandit as *baghi* (a rebel seeking social justice) among marginalized groups, and thus of Phoolan as a social revolutionary and a subject of popular balladry in rural north India.

In one of the film's early scenes, a goat leads the way as the young Phoolan returns home, oblivious to the fact that she is about to become a child bride. In the film, a goat reappears while Phoolan is cornered and abused by her kidnappers as they prepare to viciously gang rape her. In both cases, Phoolan is depicted as a docile victim of repressive and abusive men, much like the mute and obedient goat who accompanies her. For the urban, middle-class audiences of India, Phoolan Devi, is thus interpellated and transformed into the oppressed Third World woman for the film's First World audience, and she becomes the oppressed lower caste woman trapped like an animal in the brutal, rural environs of India, where casteism and sexism frame all relations.

The film has been dogged by controversy for various reasons since its premiere. It was criticised by activist-intellectuals such as Arundhati Roy and Madhu Kishwar for dishing up a biased and sensationalized depiction of a living person as "fact" for a largely western(ized) audience. *Bandit Queen* deviates significantly from Sen's more cautious, self-critical, sensitive, multi-layered and polyphonic reconstruction of Phoolan's life. It is a one-dimensional saga of rape and retribution that ascribes to its protagonist actions and involvements that she herself had consistently denied in police statements. Roy emphasized the deliberately obfuscatory language of successive contractual agreements signed with Phoolan during her incarceration, Kapur's decision not to meet or consult with her at any point in the process, and the producers' continued refusal to show her the original, uncensored version of the film even after it had premiered worldwide in her powerful denunciation of the film (Roy, "Rape-Trick II" np). The discussion took a new turn when Phoolan, who had just been freed from prison, publicly claimed that Kapur had objectified and exploited her body for financial gain (qtd in Roy, "Rape-Trick I" np). In an interview to *The Atlantic Monthly* in 1996, Phoolan asserts: "It's simply not the tale of my life, so how can they pretend that it is? [...] In the film I'm portrayed as a snivelling woman, always in tears, who never took a conscious decision in her life. I'm simply shown as being raped, over and over again" (Weaver 100).

The film, like other postcolonial mediated texts, tells Phoolan's story with the goal of reading and re-presenting the struggle of marginalized persons and communities that have been overlooked in both colonial and nationalist versions of Indian history. The recovery of lost or disadvantaged

voices can also help to fix the meaning of such voices and essentialize them, therefore such an endeavour is loaded with difficulties. Despite the film's attempts to establish a societal critique and, as Leela Fernandes has shown, to mark sexuality and rape in a public space that considers these matters taboo, Phoolan Devi the human being is transformed into Phoolan Devi the abject subject. It distinguishes the rural from the urban, defines it as a 'pre- modern' environment, and especially locates caste and sex oppression inside it. The film, like the English-language news depictions of Phoolan, consciously seeks to show its listeners the "real story." In order to reconcile the ambivalences surrounding Phoolan's life narrative, this factual story portrays her in a rape-revenge formulaic depiction. It depicts the paternalistic gaze through which the middle classes look at the rural, subaltern -via the feminine body- by interpellating Phoolan as a tragic female figure, vulnerable as a lamb-to-the-slaughter and abused by these oppressions. This type of neoliberal representation celebrates the individual's struggle against oppression, and thus reads Phoolan as the vengeful Kali, defining oppression (caste and gender) outside of its own margins, and interpellating her as a figure not yet ready for modernity, even as it expresses sympathy for the subaltern.

Mala Sen emphasizes Phoolan Devi's unwillingness to reveal the circumstances surrounding her rapes in judicial custody and in the aftermath of Vikram Mallah's death at various times in her book. All Phoolan is willing to say about the matter is "Un logo ne mujse bahut mazak ki" ("Those people really played with me") (Sen 125). Sen expands on her biographical subject's refusal to speak about her own sexual humiliation at the hands of her first husband, the police, her kidnappers, and the Thakurs of Behmai:

because we live in societies where a woman who is abused sexually ends up feeling deeply humiliated, knowing that many will think it was her fault [...] Phoolan Devi, like many other women all over the world, feels she will add to her own shame if she speaks of the experience. (Sen 125).

Sen's interpretation frames the culturally coded "experience" of rape as a violation of "chastity" and "virtue" that all women, regardless of context or circumstance, perceive. In other words, despite her biographer's sympathy and understanding, Phoolan's inability to communicate about her abuse is interpreted as evidence of her submission to reactionary patriarchal feminine behavior norms. What such an interpretation overlooks is that women's relationships to and rights over their bodies are complex vectors of power that can only be understood in the context of specific sociocultural, economic, and political formations and contracts that establish and regulate questions of "consent" and "respectability" (Menon 97– 98) Sen tries to elide the linkages of caste and class within the larger rhetoric of women's sexual oppression by treating rape in essentialist terms as a "women's issue." "Respectability" is frequently a privilege that only women with access to the "private" can afford in a society that continues to operate according to

the gendered concept of distinct realms. A woman who intentionally or unintentionally violates this separation by exposing herself to the public gaze forfeits her right to govern her body and becomes public property.

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Hence, the autobiography presents the reader with two sets of descriptions: Phoolan Devi as a political player who reads repressive structures and stages her resistance, and Phoolan Devi as an animal-like naive feminine pawn. If we hold the tension created by the simultaneous appearance of both descriptions in a single text in play, rather than asking which of these descriptions is more accurate, the autobiographical genre can no longer be seen as revealing or reflecting the truth about Phoolan; instead, it becomes a performance of contradictions, a staging of perplexity. Consequently, Phoolan is rendered opaque, allowing her to move away from the restricted representational frames that only see her as a politically uneducated, oppressed impoverished, lower caste lady within the book. While the reader cannot fully see Phoolan Devi, she may read the "suture" -Phoolan's performative investment in specific subject positions. The "sutures" or investments in subject positions that arise in the autobiographical narrative speak to the absence of an essential self, while the opacity that distorts the reader's perception of Phoolan Devi refers to an essence that has escaped the performative re- presentation.

Devi's voice

In the foreword to the first volume published by the "Subaltern Studies Collective," Ranajit Guha uses the Concise Oxford Dictionary meaning of the term "subaltern" as "of inferior rank". This simple definition, which is theoretically informed by Italian Marxist political thinker Antonio Gramsci's ideas to seek to recover and reveal the 'person of lower rank' for the consumption of English-speaking audiences. In her query, can the subaltern speak?, Gayatri Chakravorty Spivak highlights this process of hegemony where she highlights that "when a line of communication is formed between a member of subaltern groups and the circuits of citizenship or institutionality, the subaltern has been inserted onto the long path to hegemony".(Spivak 110) Referring to Phoolan Devi as a subaltern woman is to place her in the socio-political and economic framework in which she was sentenced to live her life as a woman of 'lower rank,' and to draw attention to the discursive processes that repeatedly praised her through mythologized categories. The term subaltern is also methodological, as it enables to move through interdisciplinary spaces and bring

literatures that focus on categories like caste and gender into conversation with bodies of work that investigate the construction and resistance of racial and gendered identity markers. Here, Devi becomes the subaltern, who does not really have a voice that she can exercise because of a continuous interpellation of her image.

For the media who had mythologized her image, her entry into the mainstream was a let-down. The figure emerging from the Chambal ravines' wilderness was "nowhere near the magnificent picture that was painted of her [...] the legend turned out to be a wisp of a girl, dressed in khaki bell-bottoms, revolver held high over her head, and a red bandana holding back unruly strands of hair," according to the media (The Hindu, editorial). What the media didn't realise was that the "legend" - which they now admit Phoolan didn't live up to - was created by their own myth-making machine. In other words, the media failed to notice that they were "uncreating (ing) their own myths of her legendary figure,". (Rushdie 59) Portraying her as either a victim of rape who killed the men for revenge or as Goddess *Kaali* who took arms to protect the people of her community, limit her image and suppress her voice. The highlight of her rape or her lover's murder despite her discomfort and denying it to be the motive of the mass-killing by the media proves how the subaltern does not have a voice of her own.

Where on one side the media fantasizes her image, the state refuses to turn a blind eye towards the faced experiences of oppression of Devi. And hence, the subaltern does not get a position to define herself and is being continuously spoken for by power play of the state and the media.

Conclusion

The paper looks at the concepts of terrorism and resistance from a political and legal perspective along with the politics that revolves around them. It seeks to establish that these terms are 'relative' and are to be looked from a subjective point rather than an objective one. This is done by looking at the case of Phoolan Devi 'the bandit queen' by evaluating her through the lens of the state and the popular media, the two pillars that represent a society's popular belief and hold the power of defining. It addresses the question of Devi's branding by evaluating its legitimacy and the position of the authority that brands. It looks at how this debate of her being a saviour or a criminal by the power hierarchies silence her socially and institutionally making her a subaltern.

The research starts with evaluating her case with the various determiners of a 'terrorist' as defined by the state. It compares her act of mass killing in Behmai along with her group with the then existing and enforced laws of terrorism and establishes the point that if looked at her case legally, her committed crimes qualified to be called as an act of 'terrorism'. I specifically look into three pointers among the several- 1. the threefold context, i.e. the politics of establishing authority, intent and the repercussions, 2. Threat based communication and 3. intent

of the committed crime. And finally, I evaluate her case with the then enforced laws on terrorism that ideally prove her to be terrorist from the legal point of view. Hence, deriving that Devi according to the law defined by the state was a terrorist.

This is followed by comparing her case with the idea of ‘resistance’ where the basic point of coverage lies around the idea of ‘denial of justice’. I evaluate various instances of her life where she was denied access to justice that establishes the base point of her intent of her committed crimes. This includes the oppression that she faced due to the caste she belonged to, the class factor and finally, the institutional oppression and exclusion. I look into the notions of ‘lack of access to justice’ which happened in two ways- socially because of her societal status and also the institution of justice itself, due to lack of law reforms. It was a clear case of oppression and denial of justice. I chose to explore the possible reasons of her committing the Behmai massacre which lead this research to look at her as figure of resistance as well. Hence, the institutional oppression that she had to face throughout her life makes her an oppressed and her act of reverting to the oppression should be seen as an act of resistance in response to the lack of access to justice.

Now this brought the research to the point where it establishes that the concepts of ‘terrorism’ and ‘resistance’ have unclear boundaries and depend on personal interpretation. The law in a way overlooks the personal narrative of oppression which comes from a technical point of view (as per definitions that are flawed and biased). The state despite claiming an authoritative neutral position exercises uneven power on people that become evident from the point of denial of access to justice. This case hence, proves to be clear case of ‘one man’s terrorist is other man’s freedom fighter’ hence, establishing that the ambiguity between both the terms cannot be resolved and drawing clear boundaries of distinction between ‘terrorism’ and ‘resistance’ is not possible. These are to be seen with a contextual background only.

Media plays the most significant role in presenting the counter side of the debate of branding Devi. In this study, I look into the popular representations of Phoolan- her autobiography that was originally published in French *I, Phoolan Devi*, the film *Bandit Queen* (1994) by Shekhar Kapur that was based on Mala Sen’s biography *India’s Bandit Queen*. I also looked into some of the articles in English language print media from various newspapers and magazines. These popular media representations that have made the Phoolan Devi an accessible object of study have presented her from various power stand-points with biases and hence, have ended up misrepresenting Devi. They have also silenced the voice of the subject by disregarding her stand point on the arguments made on her. The otherization of Devi as an object body makes her figure even more inaccessible resulting in making her a pawn of running a narrative depending upon the bias it comes from. The binary representation of either her being a powerless victim or an irrational person has denied her the agency to speak for herself. Through this observation I try to prove

how Devi has only been misrepresented depending upon who defines her from their standpoint in the power hierarchy.

Therefore, I finally conclude through this research that there are no set parameters to define a person as a terrorist or a figure of resistance. The branding depends on who is defining from what context and hence, it is nothing but a power play where the ones up in the hierarchy get to create a narrative and define. One can find the political benefits of branding Phoolan Devi into either of the categories very clearly if they look at the trajectory of happenings that followed. Mala Sen's book created a new narrative which publicised Devi as a figure of resistance for the oppressed which was effectively used to gain popularity and support from the people by the Samajwadi Party.

The research becomes important in the current scenario when the ideation and legitimization of any issue depends on how it is defined by the society. The research has tried to establish the power interventions of defining through the case study implying that propagated ideas or defined image of a person or an incident stand valid only from one point of view. This implies that propagated definitions by the state or the media are not absolute ones but are merely a stand from a particular bias. Therefore, branding of a person as a terrorist or a figure of resistance is not ultimate rather it is just an interpretation.

This research has enquired the problem through the case study of Phoolan Devi only through the lens of legal definitions and popular representation in media mostly in English. The topic can be approached from several other disciplines such as history, sociology, anthropology, and even semiotics to dive deeper into the concepts themselves. The ideas of terrorism and resistance are of huge importance today when the entire idea of questioning the legitimacy of any act of resistance depends on defining. The idea of access to justice can be worked upon more to explore that can bring out constructive criticism on the judiciary system of the country and also help identify the flaws in the current legal system that denies equal treatment to all in practice. The topic of oppression becomes the most relevant one in the entire debate of terrorism and resistance which can be approached from a variety of approaches like the subaltern theory (that I have briefly explored in this research), caste studies, etc. I believe that this area of study has great scope for further research that can help formulate not just better laws but also help in developing a better outlook of the world in terms of evaluating in terms of context by tracing a history of oppression.

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