When I wore the foulard, I had a group of little girls. . . . From time to time—it was the summer—I took the little girls from their apartment building in the housing project to the park. So we took the bus, and the people who participated left, and there was a woman who had a stroller. We got in the bus, and I helped take the stroller, and as I climbed on the bus, the driver closed the doors on me. Because I was wearing the foulard. The baby just missed being squashed. But it was done on purpose. He did not excuse himself. I entered with the stroller, and I discussed it with him. “Can you apologize, sir?” And finally he said, “I am in a big rush.” He spoke very roughly to me. . . . I did not see that the kids from the housing project . . . were not far away from the bus. They saw what had happened. They all came, and they took the bus apart.

What does that mean?

They threw rocks, tried to break the windows because they saw this scene of injustice. I did not know that [the kids] were following the bus. . . . [T]hey know that we are in an Islamophobic context, and they get fed up. They intervened to reestablish justice. So what [the driver] saw from a distance as an act of violence was for them an act of justice.

This story comes from a member of Étudiants Musulmans de France (EMF [Muslim Students of France]). She is a young French woman who is Muslim and the child of Algerian immigrants. Her story illustrates the kind of daily
hostility many Muslims experience in France. This hostility is in part a product of an omnipresent elite discourse that condemns Muslims as unfit citizens. Yet many French Muslims themselves do not doubt their French identity.\(^1\)

As this young woman notes, the bus doors were closed on her because of her *foulard*, an external sign of her belief in Islam.\(^2\) While her story recognizes the violence of the children’s response, it also complicates that interpretation by explaining that for the children, vandalizing the bus was a reaction to what they perceived as an act of injustice. The interviewee herself connects what she perceives to be the driver’s Islamophobia (which for her connotes fear and intense dislike of Islam and Muslims) to injustice.

But what kind of injustice took place? The interviewee was not denied rights by a government official. Nor was she told she could not enter the bus. How are we to understand the “injustice” present in this story?

Muslims, perceived by some in France as frighteningly or undesirably “different,” routinely encounter social indignities of varying magnitude. This sometimes amounts to acts of violence (hitting, shoving, grabbing, threats) that could conceivably implicate courts as an arbiter in a civil or criminal dispute. More typically, the slights are subtle, and their informality and openness to interpretation make legal involvement unlikely.

Figure 2.1 illustrates the different ways in which citizenship may be openly or subtly undermined or questioned and the likelihood that courts will be called on to respond to these moments of exclusion. As it shows, an erasure of rights by lawmakers is a major event that will be recognized and challenged by many. Even lawmakers may challenge this erasure of rights, such as when leftist parliamentarians asked that the bill that would ban the *niqab* (the full face veil) and all face coverings in public spaces be sent to the Constitutional Court for review.\(^3\) Legally addressing a rights violation, however, can be difficult, as the violation may not be taking place on the national stage, or may even be anomalous. Thus, the courts, along with activists and allies who would help fight the violation, may be unaware of it until they are activated by the injured party. Finally, activating courts to remedy social indignities is even more difficult, as the incidents are frequent and subtle, making them burdensome to pursue legally and challenging to prove. There may be a paper trail if someone’s rental application has been illegally turned down in violation of the right to equal housing, but a spoken insult or yanked hijab leaves little evidence.

As one might expect, few Muslim interviewees sought legal assistance in response to social indignities. Such a response was perceived as impractical and ineffective. A few respondents even laughed when asked whether they would try to address an incident of social discrimination in court or through mediation. This is exemplified in an exchange with two members of EMF (described in more detail in Chapter 6), who reacted strongly when asked whether the reason that they did not go to court for social indignities is that they did not regularly think about rights.
Student: We are always talking about justice. (Laughs) But it is more about social things. Court, that is for penal things.

Engineer: For serious violence.

Notably, one way in which citizenship can be undercut that is central to this book is not displayed in Figure 2.1: through *elite discursive attacks* on one’s standing as a citizen. This method of undercutting a group’s citizenship can be just as subtle and pervasive as social slights, but it reaches a far wider audience. Even fewer Muslim interviewees sought to challenge elite discursive attacks on Muslim citizenship in court. One activist organization sued a magazine, but the more typical response was to try to engage politicians in conversation to end stereotypes—the kind of discussion that cannot happen in a courtroom. French Muslims find it understandably difficult to challenge these discursive attacks.

In this study, I argue that the standing of Muslims as citizens of France is primarily undercut by elite discourse. If we looked at laws on the books in France, we would find them facially neutral toward Muslims (although this is

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**FIGURE 2.1** Likelihood of courts being activated when citizenship is undercut.
arguable concerning laws that regulate Muslim women’s dress). But we should hesitate before saying that French Muslims are not confronted with “legal exclusion.” As sociolegal scholars remind us, law is not merely the rules we find “on the books.” The law and society tradition conceives of law and rights as social practices. They are embedded in, and reflect, social hierarchy and dominant norms. Thus, while it is common to distinguish racial homogeneity in American schools as arising from either de jure segregation (segregation mandated by law) or de facto segregation (segregation that occurs without having been ordained by law), sociolegal scholars would argue that both reflect a law-like racial hierarchy that establishes expectations and governs social behavior. Thus, when I say that French Muslims’ citizenship is undercut by elite discourse, I want to be clear about the facial neutrality of the law in France while acknowledging that this facial neutrality may sometimes mask differential treatment in practice.

These discursive attacks on Muslim citizenship, whether in the form of a bad joke, a direct criticism, or a parliamentary debate premised on the need to address Muslim integration problems, fosters a pervasive climate of prejudice. This exposes Muslims to routine indignities and may be seen as a justification for material disadvantages. In France today, Muslims encounter discouragement from school instructors and discrimination in employment and housing. At the same time, the formal promise of legal equality leads many non-Muslims to scorn Muslims for not “making it” when they supposedly have all the resources they need to be good citizens. For Muslims, formal rights all too often become empty abstractions that cannot easily offset the social stigma they regularly encounter. The ineffectiveness of formal rights claims for addressing social indignities and elite discursive challenges to Muslim citizenship exaggerates the difficulty Muslim activists face in creating a counternarrative.

How is it that the citizenship of a group of people can be so vigorously questioned when those people bear legal and social artifacts of national membership, such as a passport and language fluency? How is it that supposedly equal citizens can be treated so unequally? The answers to these questions concern law and society, political theory, and comparative politics scholars, as well as anyone interested in issues of minority rights and equality.

Answering these questions requires familiarity with the philosophical underpinnings of citizenship. What opportunities does citizenship create, how is it granted and denied, and what might the denial of citizenship foreclose? How do these general principles play out in the specific context of today’s France, with its own particular citizenship tradition and contemporary political and social struggles? In this chapter, the concept of citizenship is examined, showing that it is neither a fixed nor unitary status. When an individual is branded an “undeserving citizen,” the perils of being “politically equal and socially scorned” become clear: the erasure of rights by officials, the violation of rights in society, pervasive social stigmatization, and material inequality. The chapter then moves away from abstractions to show how these ideas take form in the current French context.
How Should We Understand Citizenship?

The subject of citizenship has long fascinated political scientists. Judith Shklar (1991), David Engel (1984), and Judith Failer (2002) argue that multiple, different meanings of the term exist. Citizenship can refer to a legal status; the engaged political life of civic action; or an always qualified status that reflects one’s standing in society, politics, and before the law (Failer 2002, p. 3). This study is most concerned with this issue of standing. Shklar (1989, p. 387) argues that political rights, such as the right to vote, are not enough to secure one full citizenship. There are key social rights that are “a primary source of public respect,” and without them a person with the full gamut of political rights may find that his standing as a citizen is still somehow reduced (Shklar 1989, p. 387).

In the American context Shklar is studying, the right to earn, to work and to earn money, is not a political right, but a social right—and an elusive one for marginalized communities. “Paid labor separated the free man from the slave” in American history, and the modern inheritance of this divide is the denigration of the unemployed (Shklar 1989, p. 387). Thus, it is possible for a politically equal citizen with the right to vote, but no job, to be seen as a second-class citizen who is undeserving of public respect.

Similarly, Engel (1984) argues that the extent to which one’s membership in a community is recognized depends on whether one exhibits the markers of good citizenship that are appropriate to a given context. For example, in the community Engel studied, using the courts to settle contract disputes was seen as normal, but using the courts to settle torts was seen as irresponsible and selfish. Thus, litigious behavior was not criticized unless it matched community perceptions of “undesirable” behavior, thereby marking someone as an “outsider.”

Scholars have examined how rights discourse may be used as a tool to claim membership, or increase standing. For example, Carl Stychin (1998, 2003) highlights how rights discourse shapes national identities (and sexual identities). Engel and Frank Munger (2003, p. 3) draw attention to the way in which civil rights can be used to demand inclusion by those individuals who are on the margins of citizenship. Stuart Scheingold (2004) famously argues that rights can be used with varying degrees of success to challenge social hierarchies. But these efforts face many challenges. Changing one’s standing as a citizen requires upending dominant norms and accepted hierarchies.

Shane Phelan (2001, p. 11) reminds us that the common association of citizenship with democratic equality is a modern and curious one: “From the Roman Empire to modern times, citizenship was not clearly distinct from subjecthood.” When citizenship was reinterpreted by liberals and republicans to mean equal membership on the basis of the most inclusive characteristic possible—humanity—new methods of boundary drawing and exclusion were developed. “The stronger the presumed bond between citizens, the greater the need for exclusion to maintain cohesion and ways of life” (Phelan 2001, p. 12).
Phelan thus identifies the paradox that lives at the heart of modern citizenship: this supposedly democratic project of inclusion is carried out through the process of exclusion. When political leaders and powerful agents in society create narratives about the commonalities that bring the citizens of a nation together as an equal and equally rights-bearing people, they necessarily create misfits. Ultimately, Phelan (2001, p. 11) argues that discourse about the commonality of citizens, meant (genuinely or not) to strengthen equal rights for an equal people, provides a way to define who is “unfit for membership.”

Feminists and critical race theorists articulate a similar complaint about the role of social contract theory in citizenship. Carol Pateman (1988) argues that the social contract does not make all citizens equal. Rather, it negotiates freedom and equality between men while assuming that women are subject to men’s rule. For Pateman, all social contract theory hinges on the prior, or “original,” contract that makes men equal not in their humanity but in their dominion over women (Pateman 1988, p. 2). Extending this line of reasoning, Charles Mills (1997, p. 11) argues that whites have long benefited from a “racial contract,” in which whites enjoy a higher standing than people of color. In Pateman’s and Mills’s work, the contract theory that is supposed to guarantee equality between citizens is shown to establish legal and social justifications for gender and racial marginalization.

Social contract theorists counter that the social contract can be salvaged; it just needs to be radically revised for greater inclusivity. The liberal theorist John Rawls (1999) and republican theorist Philip Pettit (1997) have engaged in just such projects, which challenge the assumptions of their predecessors with the concepts, respectively, of reflective equilibrium and non-domination. These two concepts are intended to help people see past the social, legal, and political constraints that blind them to inequality and thereby perpetuate exclusion. Feminists and critical race scholars, however, are likely to circle back to Phelan’s critique: even when America expanded “We the people” to include “all” citizens regardless of race and gender, some citizens were still deemed more fit than others. For example, even though African Americans have all of the legal rights of whites today, the factually inaccurate trope of the welfare queen became a successful act of political rhetoric precisely because it relied on (and strengthened) long-standing assumptions among bigoted whites about the lazy, conniving, and overly fecund nature of black women (Hancock 2004). These women were citizens, but not deserving citizens. They were unfit citizens and did not merit social assistance. Legal equality did not alter that assessment.

Bringing the social contract critiques of queer, feminist, and critical race theorists together, we see that the methods of political inclusion that we have long used in democracies are accomplished through the process of exclusion. Inclusion and exclusion have been two sides of the same coin of defining a nation and its citizenry. If people are not legally excluded, they will be excluded in subtler ways. And while the labels “unfit” and “undeserving” may be more
subtle than an outright denial of citizenship, the consequences of such attacks on a citizen’s standing can be significant.

This book demonstrates that when elites create the political identity of citizenship, they hold up a positive ideal and identify dangerous aberrations that exist within the citizenry. For example, the imprisonment of peaceful Americans with Japanese ancestry during World War II illustrates how contemporary political fears aligned with a race-based definition of citizenship, creating an “other within” whom political leaders could punish with impunity.

In this book, we see that Muslims in France rarely find official law pitted against them qua Muslims. Instead, many French elites relentlessly question the Frenchness of Muslims in speeches, parliamentary debates, and writing. This book examines the power of elites to discursively shape the definition of deserving and undeserving citizens in a way that feeds on, but also enables, social indignities.

How is this possible? How do French elites define the ideal citizen? And why do they define Muslims as unfit for French citizenship? To answer these questions, we need to know more about French citizenship as a long-standing ideal, and as a contemporary articulation that responds to present-day concerns and anxieties.

**Today’s Elite Construction of France and the Deserving French Citizen**

It is important to recognize that dominant groups in every collective create distorted images of “other” groups that justify exclusion and domination, although the degrees and specific terms of this pattern vary in different contexts. This exploration of the common elite construction of Muslims and the good French citizen is just one example of a wider pattern. The rest of this chapter investigates the particular local twists, turns, and effects of this predominant, exclusionary elite discourse. Characteristics of the “deserving citizen” vary from country to country, from era to era. While there may be some enduring themes (such as self-reliance in the American citizen), their articulations are often temporally and spatially contingent. For example, today’s articulation of American self-reliance that is mobilized to criticize single mothers of color makes sense only in the contemporary context of increased social welfare, national debt, and backlash against the Civil Rights Movement (Dudas 2008). Understanding how one becomes a “deserving” citizen, then, requires familiarity with both enduring principles and the contemporary context in which that particular sociolegal identity is established.

The creation of “deserving citizen” narratives becomes particularly salient during struggles with immigration and cultural diversity. In this context, the we/us othering is an effective political scapegoat that also offers “easy” answers in times of political and social change and uncertainty. This is important in the context of France, a nation that is experiencing, as the news outlets like to flashily put it, “an identity crisis” (“France tackles national identity crisis” 2009;
“French identity crisis” 2009; Kirby 2009; Lichfield 2009a; Samuel 2007). While this may be an exaggeration, French politicians are certainly responding as if it were a legitimate crisis. In 2009 and 2010, French politicians engaged in the lengthy and at times polemical “French identity debates” in an attempt to better define what makes a person French and what French values are. Those debates, notably, included several discussions about the compatibility of Islam and the republic. Consider also how booing at “La Marseillaise” was depicted by French elites as a sign of the decline of French values and identity.

Why the “identity crisis”—or, at least, the soul searching? It would be simplistic to identify only one reason for France’s “identity crisis” and outside the scope of this book to do more. What is important to this inquiry, however, is the way in which French elites have shaped a deserving citizen narrative as part of this “identity crisis.” In this chapter, I argue that elite constructions of the “deserving citizen” in France today are defined, in part, in opposition to Muslims. Muslims are described as undeserving citizens, which opens them up to social, political, and (albeit more rarely) legal marginalization. This elite discourse does even more than that, however. It all but erases France’s colonial past and the abuses it brought on Muslims and the Arab world. It is also intended to reassure the “deserving” French and alleviate the pessimism engendered by France’s prolonged labor slump; its challenges in handling immigration; its continued gender and racial inequalities, even as the nation becomes more diverse; and its decline on the world’s political stage. The deserving citizen narrative tells us that the French republican tradition is alive and well and that those who struggle in the nation need only match the republican ideal more closely. It is their fault that they struggle, especially when the path to integration is so clearly laid out.

Who, then, are these elites, and what is the deserving citizen narrative they have created?

The Makeup of the Powerful French Elite

Politicians

Politicians in France, for the most part, are white and Catholic or not religiously affiliated (see Figure 2.2). In 2008, “one black member represent[ed] continental France in the National Assembly among 555 members; no continental French senators out of some 300; only a handful of mayors out of some 36,000, and none from the poor Paris suburbs” (Kimmelman 2008).

Many scholars have studied the formation of political and administrative elites in France. Ezra Suleiman examines how the grandes écoles, prestigious institutions of higher education that are discussed in greater detail in Chapter 4, provide a formal, institutionalized avenue to power in France. Success, he argues, depends on whether one attends such a school (Suleiman 1978, p. 4). Peter Gumbel (2013, preface, para. 6) goes as far as to describe a grande école degree as “a de-facto guarantee of professional success and security, and a fast track to the pinnacle of French society.” Cornelia Woll (2009, p. 229) points out
that a *grande école* education tends to generate elite insularity, because outsiders are viewed with suspicion. As Michalina Vaughan (1981, p. 101) describes it, the *grande écoles* “justify the position of this elite by guaranteeing its calibre.” Thus, while the system of elite production was designed to be meritocratic, “merit” is “recognized and legitimated only when it is certified by a restricted number of institutions” (Suleiman 1978, p. 4).

Luc Rouban (2012, p. 480) quantifies the elitism of French politics by examining the educational background of those who have worked closely with more than three decades of French presidents. Some 80.4 percent of the presidential
entourage of Valérie Giscard d’Estaing consisted of former students of at least one *grande école*. The figures were 40.8 percent and 58 percent, respectively, during François Mitterrand’s two presidential terms; 53.1 percent during Jacques Chirac’s presidency; and 69.6 during Nicolas Sarkozy’s presidency, which may seem ironic given his criticism of elitism of French politics and business. The story is similar for those working with French prime ministers. Under François Fillon’s government (2007–2012), 67.3 percent of the entourage attended at least one *grande école*, with most coming from either the École Nationale d’Administration (ENA [National School of Administration]) or Sciences Po Paris (37.6 percent and 40.6 percent, respectively) (Rouban, p. 481). Political leaders in France are not only products of elite education; they are frequently products of the same elite education.

The claim that French politics is elite-driven and highly centralized is no news to scholars of France, who have long noted the elitism of France as a strong unitary state (Cole 2008; Crozier 1964; Jenkins 2000; Tocqueville 1983). Given the elite and closed nature of politics—politicians tend to come from the best schools to which it is difficult to gain entry—it is not surprising that immigrants and those with an immigrant background find it difficult to break into French politics.

### The Media

The media in France is highly centralized, as well. As Laurent Mucchielli (2005, p. 25) notes, there is a sort of “Paris-centrism” among journalists, “which leads them to believe that the Parisian region constitutes a sort of representative sample of all of French society.” This, of course, could not be further from the truth. The editor-in-chief at Oumma.com, a well-known French news website composed primarily by French Muslims but intended for an all-France audience (some of France’s top non-Muslim thinkers contribute to Oumma.com), explained this phenomenon further: “The media is all concentrated in Paris. The problem of political correctness, I think that touches lots of countries. Except in France, it is rather particular because in other places, there is media in each state, in each city. But in France, it is all concentrated in Paris. There are three, four papers; three, four newscasts; there are the same journalists you see everywhere; it is a little group that sticks together and shares information, jobs, etc.” When the editor-in-chief talks about “political correctness,” he is not referring to the progressive-minded self-censoring that we think of in the United States. “Political correctness,” for the French, often refers to saying that which is correct according to the dominant political views of the day. The editor-in-chief’s critique, then, is that the centralized nature of French media produces uniformity of thought. Since few Muslims are currently successful in French media, this means Muslims are not speaking for themselves or creating their own images in France. It was only in 2006 that France saw its first nonwhite presenter of a prime-time news program: Harry Roselmack, a black man. Diversity is slow to come to the media in France.
Finally, there are the French intellectuals. They are accomplished people, renowned for their intelligence. Their work is published, and they routinely appear on evening panel programs. French intellectuals are involved in political life and have an influence and prestige that is difficult for Americans to understand, having little familiarity with such figures. A well-known historical example of the French intellectual’s power is the involvement of Émile Zola, Anatole France, and Octave Mirbeau (all three authors) in the ardent defense of Alfred Dreyfus, a Jewish officer falsely accused of treason in the 1890s (Kauppi 2000). Zola’s famous 1898 letter to the president, “J’accuse,” condemning state anti-Semitism, was published as front-page news (Kauppi 2000).

The intellectual, then, is a prominent French figure and one that can have great authority. As Niilo Kauppi (2000, pp. 17–18) describes, “During the Dreyfus affair, instead of merely being a member of an intellectual profession, the intellectual became the privileged defender of Republican virtues . . . a Romantic hero, a self-appointed watchdog of public virtue, who operates in the timeless realm of justice.” The intellectual has a moral mission, justice. Importantly, that justice is understood in terms of republican virtues.

There Is Power in a Unified Discourse

These three elite groups regularly share ideas with one another. As John Bowen (2007, p. 3) states, “French politicians, writers about public affairs, television ‘talking heads,’ and philosophers are much more likely to read one another’s work, be related to one another, or indeed be the same person than is the case in most other countries.” This insularity helps produce what he and many others call “la pensée unique, a single way of thinking.”

The editor-in-chief of Oumma.com expressed a similar sentiment when he discussed the closeness of political and media elites, and of their thinking: “As soon as someone has media or political power in France, they attach themselves to it. In France, it is a class—it is called la classe politico-media. That is the people who are from the same social strata, who went to the same schools. It is a true ghetto, a politico-media ghetto. In general, all that comes from the outside, that is not similar, is not welcomed.”

An example helps illustrate the closeness of these networks. Caroline Forest’s book The Obscurantist Temptation criticizes Islam as a backward religion that fundamentally opposes the values of the French Republic. The Obscurantist Temptation won the French National Assembly’s award for Best Book on Politics in 2006 (Scott 2007). Politicians give prizes, literally, to those who share in this elite discourse.

In addition, those Muslims who are part of the political elite share in elements of the dominant political discourse, some more than others. This was remarked on with bitterness by many of the respondents whose voices are included here, who accused President Sarkozy of politically convenient tokenism. Not all of the respondents were so contemptuous of President Sarkozy’s move.
to place religious and racial minorities in high positions in his government, and some even saw it as positive change. Those suspicious of difference-blind republicanism, however, remained circumspect in their evaluation of the politics of these highly placed minorities.

**Today’s Elite Category of the Deserving French Citizen**

If we accept that there is a difference between being a citizen and being a *deserving citizen*, it becomes important to understand what these influential voices of French social and political norms—politicians, the media, and intellectuals—think about French citizenship. How do they define the deserving citizen? I outline the definition here and then explain in the final section of this chapter how French elites mobilize it to depict Muslims as undeserving.

In France, as we are frequently told, the deserving citizen embraces the principles of liberty, equality, and fraternity. For those with even the vaguest sense of French history, this is recognizable as the perennial discourse of French citizenship that has remained dominant since the revolution, except during the period of Vichy government, which valued “Work, Family, and Fatherland.”

Liberty, equality, and fraternity, just like any other big ideas, do not have fixed meanings. Their articulation by elites in today’s French political context produces a set of characteristics that mark someone as a deserving French citizen. Joan Wallach Scott, the feminist theorist and France expert, identifies five characteristics that disqualify one from being seen as fully “French”: anything short of complete liberality in sexual relations; any reference to or sign of religion in not just political but also social affairs; cultural pluralism; anything short of abstract individualism; and ancestral origins beyond the countries of Europe (Scott 2007, pp. 5, 11, 88, 125, 172–173). Apart from the last of these five characteristics, which has nothing to do with personal choice, these characteristics are all defended as “French” because they are seen as contemporary articulations of the French values of liberty, equality, and fraternity. Those who do not bear the five characteristics are seen as rejecting France’s national values triad. How does this work?

First, in this context, liberty is understood to encompass a certain kind of sexual behavior, and all other behavior is thought to be less than free or even dangerous to the freedom of others. Second, the dominant discourse on equality in France is difference-blind: respect is based not on the acknowledgment and well-mannered discussion of difference but, rather, on the equality of the abstract “French citizen.” Following from this, those who fail to be “abstract individuals”—those who identify with their religion or particular culture in the public sphere—are seen as failing to be French and as challenging the notion of equality. Their particularism is seen as a danger to national unity. Third, the value of fraternity today is commonly thought of as inseparable from *mixité*, the idea that those with differences should mix together so that the differences become immaterial. While this could mean the mixing of social classes and
people of different races or ethnicities—and elites sometimes do reference the importance of reaching across these divides—it often is referred to as the mixing of the genders. In this way, it discredits those who for religious reasons (or any other reason) value notions of sexual difference or segregation, such as reserving a public pool for a short time each week for same-sex swimming (a contentious issue in France).

How Muslims Fall Short of the Deserving Citizen Category

The elite *pensée unique* is that Muslims have failed to integrate fully into France. They may no longer be immigrants, but they are not yet French, and it is unclear whether they will ever manage to be. Where there is debate on this question, it mostly concerns whether it was the Muslims who failed (typically rightist and extreme right explanations) or France that failed the poor and marginalized, which includes Muslims (typically centrist and leftist explanations). The presumption of failed or incomplete integration, however, is common and found on all sides of the political spectrum.

There are dissenting voices that work to delegitimize this dominant discourse. They include scholars such as Sylvain Brouard, Didier and Eric Fassin, Françoise Gaspard, Farhad Khosrokhavar, Cécile Laborde, Laurent Mucchielli, Olivier Roy, and Vincent Tiberj. Furthermore, there are individuals one might describe as “allies” who work together with Muslims to fight discrimination. For example, the antiracism association SOS Racisme has taken complaints about the desecration of Muslim graves to court (“Huit tombes ont été profanées” 2009). Another example is that of lawyers: a couple of well-established, secular lawyers with no interest in defending Islam (Jean-Michel Pollono and Gilles Devers) have courted the media and public attention in their fight to defend the right of their clients to wear the *niqab*, based on their agreement with their clients’ reading of the French Constitution and the Declaration of the Rights of Man and of the Citizen.

There are also politicians who warn about the dangers of this constant questioning of Muslim “Frenchness.” Robert Badinter, former minister of justice and husband of the feminist intellectual Élisabeth Badinter, complained bitterly on French radio that continued questioning of the “Frenchness” of Muslims serves only the extreme right (FranceInter 2011). Similarly, National Assembly Representatives Jean-Marc Ayrault, Noël Mamère, Jean Glavany, Michèle Delaunay, and François de Rugy complained during the debates about the *niqab* that such political conversations stigmatize the Muslim population and risk doing more harm than good. Danièle Hoffman-Rispal also insisted that many Muslims are proud of their French identity. But it is important to recognize that these comments were in the minority during that debate and entirely absent outside the political left.

As the following examples show, while certainly not all French elites question the citizenship of Muslims, such suspicion is nevertheless predominant in elite
discourse, along with a tendency to disregard the wide diversity among Muslims in France, as well as the diversity of their political and (albeit few) legal claims.

**According to Politicians**

While serving as the minister of the interior, Nicolas Sarkozy participated in a televised debate with Tariq Ramadan, a theologian and well-known though contentious face of “European Islam,” and Jean-Marie Le Pen, the former leader of the French extreme-right nationalist party Front National. The debate focused significantly on the subject of France’s Muslims. Sarkozy began his opening remarks with the statement—or, rather, apology—“Let us recognize the failures of French integration” (Ceaux and Jakubyszyn 2003). These strong words lead one to believe that France’s Muslims have not been integrated. The placement of the blame is unclear in Sarkozy’s pithy opening statement, but the conclusion of “failed integration” is understood.

Sarkozy is not alone. French politicians regularly depict Muslims as integration failures and outsiders. This statement is based on an analysis of depictions of Muslims in all legislative reports that made any mention of “Muslims” during the Twelfth Legislature of the French National Assembly (2002–2007). In that time frame, there were forty-three relevant reports. Six of them were eliminated from the sample because they were from the debates that centered on laïcité and religious symbols and clothing in public schools in 2003. Those debates discussed Muslims and the hijab so extensively that including those data in the analysis would have skewed the results to the point of rendering them meaningless. (In the other thirty-seven debates, Muslims were mentioned between one and eight times. The six “outlier” debates mentioned Muslims at least forty and sometimes more than a hundred times.) In the final sample, a total of eighty-one references were made to Muslims (see Table 2.1).

It is telling that outside the 2003 discussion of the hijab, which mentioned Muslims several hundred times, Muslims were mentioned only eighty-one times in the reports of the National Assembly. This suggests that the Twelfth Legislature was primarily concerned with Muslims as a problem of integration, a central theme of the laïcité debates of 2003.

The data also reveal a view of Muslims as outside France geographically and historically. The majority of references are to Muslims living outside metropolitan France, either in overseas territories or in foreign countries. Another frequent reference was to Muslims as harkis. This term, which among some people has taken on the derogatory meaning of “collaborator” or “traitor,” was initially used to refer to those Muslim Algerians who supported France during the French-Algerian War. Harkis are not irrelevant to French politics, but as a subset of Algerian Muslims from a very specific generation, they represent a small group among the now three to four generations of Muslims who live in France.

Finally, the nature of the National Assembly’s discussion suggests that Muslims are primarily interested in religious matters—something this book refutes.
Of the three requests made of government that were mentioned in the Assembly, all were religious: they were requests for prayer space, for religious pool accommodations, and for the ability of Muslim soldiers to practice their religion on equal terms with non-Muslim soldiers. In addition to this are five references to the religious obligations of Muslims, ten mentions of Muslim chaplains in the army and prisons, three mentions of the hijab as a religious item (without any discussion of its complex secular uses in France today), and five mentions of “extreme religiosity” (Muslim terrorism, extremism, fundamentalism, and fanaticism). Six of the references to “Muslims” were in fact placeholders for religion itself—that is, “Islam.” These were references to “the religion of Muslims,” a common but peculiar phrase that assumes a clear relationship between being a Muslim and following Islam. As I explain in Chapter 3, Muslim identity in France is much more complicated, and the monolithic reading by the National Assembly of “Islam as Muslims and Muslims as Islam” is problematic.

**According to the Media**

The French media’s interest in Muslims has escalated in the past twenty years. This is demonstrated in an increase in the mention of Muslims (*musulman*) in the headline or lead paragraph of articles in *Le Monde* since 1990 (see Figure 2.3).
In 1990, fewer than fifty articles mentioned the word “Muslim” in this way. That number rocketed up to 322 in 1995—due in part to the bombing campaign carried out that year in Paris and Lyon by members of the Groupe Islamique Armé (GIA [Armed Islamic Group]), who sought to advance their efforts in the Algerian Civil War on French soil. This media attention waned by 42 percent by 1998 and then increased gradually until a sudden twofold increase in 2001—the year of the 9/11 attacks. Coverage of Muslims decreased by 25 percent during 2002, and then shot up again in 2003. This was the year that the most recent political debate over the hijab took place. At that time, the question was whether young women should be allowed to wear the hijab in public schools. The eventual answer, codified in 2004 with the Law on Secularity and Conspicuous Religious Symbols in Schools, was no. While coverage of Muslims in *Le Monde* in 2007 and 2008 was roughly half of what it was during the height of the *affaire du foulard*, or hijab debates, those numbers from 2007 and 2008 are still a sevenfold increase from the coverage of Muslims in the early 1990s.

Why is this the case? The spikes in media attention are event-oriented: they center on dramatic and important political events, such as the GIA bombings, 9/11, or the most recent political debates about the hijab. One could perhaps argue that these event-oriented spikes are simple outliers that do not accurately represent the overall attention paid to Muslims in France and that the attention

**FIGURE 2.3** Change in the frequency of news articles about Muslims in France, 1990–2008, as reflected by the mention of Muslims in the headline and lead paragraph of articles in *Le Monde*. 
decreases when these dramatic events disappear from the front page. Yet the frequency of news articles about Muslims in *Le Monde* never completely returns to where it was before any one of these dramatic events. Rather than events in isolation that lead to momentary spikes in media attention, these three focusing events—the GIA bombings, 9/11, and the most recent *affaire du foulard*—are watershed events that now shape how Muslims are depicted in France.\(^1\) Virtually ignored by the media in the early 1990s, Muslims “became news”—that is, are seen as newsworthy—more and more with each of these events.

Unfortunately for Muslims, “becoming news” has meant “becoming a problem.” In each of these events, Muslims are associated with violence, extreme religiosity, and disrespect for France’s secularism. I do not mean to suggest that these three events have been the most important focusing events for the discussion of Muslims in France. There are other important focusing events, and some are discussed in Chapter 6. But while these three events may merely be the most obvious drivers of media attention concerning Muslims since 1990, they reflect the French media’s tendency to question Muslim citizenship.

Let us look at more qualitative measures: How are Muslims depicted in the media? Table 2.2 summarizes the analysis of a random sample of articles in *Le Monde* between 1990 and 2008 with “Muslim” (*musulman*) in the headline and lead paragraph.\(^2\) The sample was limited to articles concerning “France” and mentioning Muslims at least three times, and it excluded opinion and editorial articles. This sample was analyzed for how the articles depicted Muslims in France. The overall pattern that is instantly recognizable is a frame of “integration”: Have Muslims integrated into France or not? While roughly 41 percent of mentions of Muslims in the articles were neutral on this subject, 50 percent were framed by the subject of integration. In other words, half of all the media attention on Muslims in France concerned itself with whether Muslims have integrated into France. If every other reference to Muslims in the media that a French person reads presents this question, his or her understanding of Muslims in France may grow to include a vision of Muslims as somehow not completely French. Of the references to Muslims that were framed in this way, 40 percent depicted Muslims as good citizens who are integrated into France, 28 percent depicted Muslims as problematic citizens who have habits that prevent them from fully integrating into France, and 32 percent depicted Muslims as bad citizens who have not integrated into France. Thus, a total of 60 percent of all references to the integration of Muslims depicted Muslims as somehow not integrated.

The overall frame of integration itself, whether Muslims are depicted as having integrated well or poorly into France, is not neutral. It suggests that the verdict is still out as to whether Muslims can be French. It also suggests that there is something unassimilable about these people that may prevent them from being good citizens. In a nation such as France, where republicanism has meant that anyone who wants to become French need only be born on French soil (or be naturalized) and participate in France’s language, culture,
and education, this seems paradoxical. Many of France’s Muslims were born in France, many speak French and only French, many have gone through the French education system, and an increasing number of French men and women from families that have long been in France and long been Christian have converted to Islam. This frame of integration not only suggests that Muslims are inherently difficult to “make French”; it also points to the limits of today’s understanding of the French ideal of republicanism: this minority group somehow eludes a norm that is meant to produce an all-inclusive view of citizenship.

**According to Intellectuals**

French intellectuals have also criticized Muslims for poor citizenship. Five prominent intellectuals—Régis Debray, Élisabeth Badinter, Alain Finkielkraut, Elisabeth de Fontenay, and Catherine Kintzler (all philosophers, academics, or feminists)—published a letter in *Le Nouvel Observateur* urging instructors in

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**TABLE 2.2 DEPICTION OF MUSLIMS IN LE MONDE, 1990–2008**

<table>
<thead>
<tr>
<th>Depictions of Muslims(^a)</th>
<th>Housing(^b) ((n = 15))</th>
<th>Education(^c) ((n = 27))</th>
<th>Employment(^d) ((n = 12))</th>
<th>Total(^e) ((n = 100))</th>
</tr>
</thead>
<tbody>
<tr>
<td>Integrated/good citizens(^f)</td>
<td>18 (19%)</td>
<td>46 (28%)</td>
<td>20 (32%)</td>
<td>105 (20%)</td>
</tr>
<tr>
<td>Neutral(^g)</td>
<td>41 (42%)</td>
<td>60 (36%)</td>
<td>11 (17%)</td>
<td>218 (42%)</td>
</tr>
<tr>
<td>Problematic citizens(^h)</td>
<td>8 (8%)</td>
<td>22 (13%)</td>
<td>7 (11%)</td>
<td>73 (14%)</td>
</tr>
<tr>
<td>Not integrated/bad citizens(^i)</td>
<td>26 (27%)</td>
<td>27 (16%)</td>
<td>17 (27%)</td>
<td>84 (16%)</td>
</tr>
<tr>
<td>Discriminated against(^j)</td>
<td>4 (4%)</td>
<td>12 (7%)</td>
<td>8 (13%)</td>
<td>44 (8%)</td>
</tr>
<tr>
<td>TOTAL</td>
<td>97 (100%)</td>
<td>167 (100%)</td>
<td>63 (100%)</td>
<td>524 (100%)</td>
</tr>
</tbody>
</table>

\(a\) R-generated random selection of *Le Monde* articles between 1990 and 2008 with “Muslim” (*musulman*) in the headline and lead paragraph. Limited to articles concerning “France” and with at least three mentions of “Muslim,” excluding opinion and editorial articles.

\(b\) A subset of articles cross-tabulated for “Muslim” (*musulman*) and “housing,” the latter including “housing, neighborhood, suburb, apartment” (*logement, quartier, banlieue, appartement*).

\(c\) A subset of articles cross-tabulated for “Muslim” (*musulman*) and “education,” the latter including “education, school” (*éducation, école*).

\(d\) A subset of articles cross-tabulated for “Muslim” (*musulman*) and “employment,” the latter including “employment, unemployment, and work/labor/job market” (*emploi, chômage, travail*).

\(e\) All of the articles in the random sample.

\(f\) Depictions of Muslims as “integrated” into French life and values or as “good citizens,” including the following themes: direct mentions of “integrated”; tolerant; involvement in interreligious, community, or state-society dialogue; appreciation of freedom, equality, fraternity, or *laïcité*; sacrifices for the state; social, political leaders or successful; or supportive of the 2004 law banning the hijab in public schools.

\(g\) Neutral depictions of Muslims, including neutral descriptions of Muslims themselves, of their religious activities and obligations, or of Muslim organizations.

\(h\) Depictions of Muslims as “problematic citizens” in that they are not necessarily “problem citizens” or “bad citizens” but have certain qualities that are seen as “difficult,” including the following themes: Muslims perceived as disorganized, as still requiring “integration,” as politically ineffective, as having questionable national loyalty, as being more religious than is normal, as being hostile toward non-Muslims, or as being opposed to the 2004 law banning the hijab in public schools.

\(i\) Depictions of Muslims as “not integrated” into French life and values or as “bad citizens,” including the following themes: direct mentions of failure or refusal to “integrate,” intolerant, religious extremism, colonial-era violence or disorder, or associations with violence, criminal activity, or disorder.

\(j\) Depictions of Muslims as discriminated against in French society.
public schools to refuse to allow their Muslim students to wear the hijab (see Figure 2.4). This was in 1989, when there was no nationwide ban on the hijab in public schools and school administrators were told by the Conseil d’État to handle the issue with sensitivity to the context, on a case-by-case basis. At this point in time, schools made a variety of policies attempting to adapt to students’ needs and the demands of French laïcité. The five intellectuals were demanding a single, hard-line solution in (they claimed) the name of French values and laïcité. The hijab was inherently unfree and therefore inherently un-French.

Interestingly, Gaspard and Khosrokhavar (1995, p. 25) expressed anger that these five were presenting themselves as the voice of all intellectuals in France.
and complained that “these philosophers acted like the militants they are of a certain idea of the Republic, and not like intellectuals, who seek the truth.” Nevertheless, several important French intellectuals maintain that Muslims are a problematic presence in France. This group notably includes feminists such as Fourest and Badinter, who critique Islam for being misogynistic and a threat to France and its values, and Fiammetta Venner, who (along with Fourest) criticizes the term “Islamophobia” by arguing that there is no irrational fear of Islam in France and that such an idea has been created by Islamic fundamentalists who seek to manipulate well-meaning but naive leftists (Geisser 2005, p. 6).

The Undeserving Citizen: Politically Equal and Socially Scorned

Let us now return to the question posed at the beginning of this chapter: “Why do elites depict Muslims as failed or undeserving citizens?” There are Muslims who have succeeded in politics and reached elite levels in business in France, so sweeping accusations of simple “religious intolerance” or “racism” fail to explain the situation. Nor is xenophobia an adequate explanation, as the Muslim population in France is increasingly French-born, to equally French parents or even grandparents. We can begin to understand this situation, in all its complexity, by considering enduring principles of French citizenship and examining how contemporary articulations of these principles generate a false universal model for citizenship that places Muslims squarely outside the nation.

I argue along with Scott (2007) that today’s French elites define the deserving French citizen as a sexually liberal, irreligious (indifferent or hostile to religion), culturally singular, abstract individual. This supposedly universal model of deserving citizenship, however, is not as universal as it claims to be. Scott is not the only one to argue that the “universal model” of citizenship in France is informed by a hidden particular: Éléonore Lépinard and Amy Mazur (2009, p. 248) claim that “the universal abstract figure of the citizen . . . hides, since the French Revolution, a masculine persona.” Birte Siim (2000) and Laure Bereni (2007) make a similar argument about masculinity and citizenship. Ariane Chebel d’Appolonia (2009, p. 270) also discusses how the historical anxieties France had in integrating Jews and colonial subjects point to a “core ambivalence” about how “universal” republicanism truly was. Clearly, Muslims are not the only ones who struggle to fit this mold. This normative model is easiest to access if one

has been born and grows into a sexual and gender identity that comfortably fits social norms, making experimentation easy and blameless;

has been born into a family that already has no religion or that casually practices Catholicism, a religion whose social dominance lends it a kind of invisibility;

has no identifiable ethnic or racial difference from a white European; or

has experienced the kind of privilege that exempts one from the institutionalized collective miseries (gender inequality, poverty, racial
discrimination, heteronormativity) that inspire a sense of shared otherness, if not group politics.

The resulting “universal,” as Pateman and Mills (2007) would agree, actually points to a particular kind of identity: the straight, a-religious, white, financially comfortable man.

Of course, those who may not fit this mold may still believe it is universal and fight to defend its universality in the name of fighting for equality. Some female French feminists such as Élisabeth Badinter (2006), for example, maintain that gender equality can be met only when we move past gender differences and focus on rights for all abstract citizens, regardless of ascriptive or chosen characteristics. As I discuss in Chapter 3, some French Muslims uphold this abstract model, as well. It should be noted, however, that the very act of upholding the universal model of deserving French citizenship requires at least a strong education in French politics and history—something that is not accessible to all French citizens in today’s era of increasing educational stratification. Even appeals for the universal to remain universal come from a particular place.

In short, we find behind the universal model of the deserving citizen the specter of a very particular kind of French citizen. What is most important for this inquiry is the fact that elites routinely mobilize this deserving citizen model to criticize Muslims as its opposite. Muslims are typically depicted by French elites as sexually aberrant (either predatory or virginal), as so religious that Islam dominates all aspects of their lives, and as unwilling to think beyond their Muslim identity to the common good. Consider how the political, media, and intellectual depictions of Muslims presented above associate Muslims with excessive religiousness, immigrants and foreigners, violence, and sexual repression. And because of stereotypes that exist about Muslims in France, even those who vaguely identify as Muslim in a cultural sense but have a weak attachment to the religion find that they are assumed to lack these five characteristics that define the deserving French citizen, even if they have them (or, at least, the first four) in spades. Muslims, we are told, behave in ways that suggest they do not share in the French values of liberty, equality, and fraternity. They remain outsiders even though they bear the legal accoutrements of citizenship: they may be citizens, but they are undeserving citizens. Alain Boyer (2005, p. 11) uses the phrase “de facto inequality” (inégalités de fait) to refer to difficulties French Muslims face in spite of constitutional rights, such as the “image handicap,” which he defines as the persistent negative image of Muslims that questions their national belonging.

What does it look like when a citizen does not bear one or more of the markers of normative citizenship—that is to say, when one is willingly or unwillingly subsumed under a public identity that is politically equal yet socially scorned? I extrapolate from an example Scott (2007) provides to illustrate some of the social and legal consequences. “Doing sex the French way” is understood to be sexual liberality. Even those who do not critique the sexual activities of
others but prefer for themselves alone to abstain until marriage are seen as aberrant, as undeserving of membership in the French citizenry (Scott 2007, p. 172). As Scott describes it, “Those who do not share this value (Muslims in this case) are not only different, but inferior—less evolved, if capable at all of evolution. The ultimate proof of the inassimilability of Islam thus comes down, or adds up, to sexual incompatibility” (Scott 2007, pp. 173–174). In failing to “do sex the French way,” one is seen as not French.

Two Muslim respondents, one male and one female, spoke about the discomfort they felt when their decision to abstain from sex until marriage came up in conversation with non-Muslims. They both described the derisive reactions of others who chided them for being either a “saint” or “sexually frustrated.” As the woman explained:

I had a colleague at work who told me her adventures with this guy, that guy, a married guy, etc. During the discussion, she asked me, “So,... how is your sex life?” I told her that the only person I have had relations with was my ex-husband, when we were married, and since then, no... It has been three years since I have had relations. “What?” she said, and she laughed. She was completely shocked... That was... too crazy for her. Not conceivable. Not thinkable. She laughed and laughed... [S]he was shocked.

The interviewee described with marked embarrassment how her personal sexual decisions became the object of hilarity for her coworker. Sexual freedom in this interaction was not understood to include the freedom to choose to abstain from sex. The respondent felt deprived of both respect and dignity in this conversation with her coworker. The respondent may have been enacting her right as a citizen to make her own sexual decisions, but in making the “wrong” ones, she was perceived as somehow aberrant.

The male respondent described the “outsiderness” he experienced based on personal sexual behavior in even starker terms: “If you say to someone that you do not have sex because you are Muslim, because it has got to be in marriage, you are an extraterrestrial. You are from another planet.” It does not get any more “outsider” than “ET.” The French principle of freedom, articulated today as sexual liberality, protects those who practice that behavior and censures those who do not. In being a sexual outsider, one encounters social hostility.

The consequences for failing to meet the norms of citizenship are not limited to social slights. They can even include differential legal treatment. In 2008, there was a highly médiatisé political uproar when the question of sexual mores became entangled in the annulment of a marriage between two Muslims.13 The husband asked for an annulment because he discovered that, contrary to what his wife had told him, she was not a virgin before their wedding. Notably, the wife wanted to end the marriage, as well, and as quickly as possible (Che-min 2008b; Vignaud 2008). The court annulled the marriage as asked, citing
a breach of contract: according to Article 180 of the French Civil Code, marriages can be annulled if it is discovered that there was a misunderstanding as to the “essential qualities” of a person (Chemin 2008b). Mistaken assessments of a spouse’s “essential qualities” that French courts have previously accepted as meriting marriage annulment include the impotence of the husband, the former prostitution work of the wife, the husband’s living under adult guardianship, and the husband’s HIV (Chemin 2008b). Arguably, the prostitution case suggests that sexual history is grounds for annulling a marriage. This may have contributed to the court’s decision in 2008.

Following the court’s decision, however, a wave of vitriolic criticism from the left and French feminists challenged the ruling. Élisabeth Badinter, of the prestigious École Polytechnique in Paris, claimed she was “revolted” by the ruling and declared she was “ashamed of French courts” (Chemin 2008b). The Parti Socialiste (PS [Socialist Party]) described the ruling as “appalling,” one that “overrides the rights of women to their bodies and to freely live, as men do, their sexuality,” and the Parti Communiste Français (PCF [French Communist Party]) added the descriptor “scandalous” (Chemin 2008b). The feminist activist group Ni Putes ni Soumises (NPNS [Neither Sluts nor Slaves]) described the ruling as “regression,” an analysis that connects the discourse on the valuation of virginity with backward philosophy—in this case, the philosophy happens to belong to the Muslim husband (Chemin 2008b). The evocation of the specter of “backward Islam” is even more obvious in the reaction of Fadéla Amara, who then served as secretary of state for urban policy and is the former president and founder of NPNS (and, significantly, one of the few Muslim political elites). She described it as “a real fatwa against the emancipation of women,” adding, “I thought that we were talking about a verdict delivered in Kandahar” (Vignaud 2008).

While it is certainly worrisome for those who fight for a woman’s right to sexual freedom to see a court recognize virginity as an “essential quality” for women in marriage, it is curious that there was no similar media coverage of or elite outcry against the court for finding a history of prostitution as grounds for annulment. After all, prostitution is legal in France, as it is considered part of one’s freedom of sexual choice and behavior. The fervor that swept across France over this particular story of annulment—the strongly worded condemnations of the Lower Court, the headlines splashed across newspapers and magazines for weeks—suggests that the valuation of virginity, specifically coupled with Islam, poses a uniquely intolerable threat to women.

There is another side to this story that was often ignored in the media fracas: that of the woman who wanted the annulment. Ironically, in seeking to protect women’s rights, feminists and the French left called for the Appeals Court to effectively remarry this woman to the man she had sought to separate from, the man who valued her less than her virginity. Rachida Dati, who at that time was serving as the French minister of justice (the “Keeper of the Seals,” a very important cabinet position in which the holder also acts as vice-president over the entire justice system), was cautious in responding to the anger at the
court’s decision. As the minister of justice, Dati was expected to speak as a figurehead of the law. As a Muslim woman who benefited from a hasty divorce proceeding when she was young, she was hesitant to see the annulment undone. Following the outrage over the Lower Court’s ruling, Dati admitted that the case had “provoked a spirited social debate” and that it now “went beyond the relationship between the two people and concerns the whole of citizens in our country, notably women” (quoted in Chaffanjon 2008). Thus, she asked the Appeals Court to take the case and review it again. Dati was also careful to note, however, that “the law is there to protect. The act of annulling a marriage is also a way of protecting the person who maybe wants to undo the marriage, because I think that this young woman . . . equally wanted, without a doubt, to be divorced rather quickly” (Chaffanjon 2008).

This kind of nuanced analysis, taking into consideration both the larger social question of women’s rights and the rights of the specific woman seeking the annulment, was largely absent from elite discussion. The Appeals Court concluded that virginity is not an “essential quality” of a person, and the woman and man were legally remarried in the fall of 2008. There is no denying that the man’s motives are repugnant to feminist and progressive sensibilities. But in arguing he had no right to an annulment, feminists, leftists, and the court denied the particular woman in question her claim to an annulment, as well. The man’s claim took precedence.

This is yet another example of the exclusivity of citizenship. Because of their association with Islam and the stereotypes of this religion as a “backward” threat to women—encouraged, admittedly, by the man’s misogyny—the man and the woman were judged to be unfit citizens. As such, they did not earn the full set of rights provided to deserving citizens. This story illustrates the rare but real legal consequences of failing to conform to the normative, ideal citizen: the denial of rights and the subsuming of an individual’s character to the stereotype of a larger group.

Conclusion

Citizenship is not merely a binary legal status. There are deserving and undeserving citizens, and to be placed outside the “deserving” category is to be seen as a social problem and a burden on the state. Public respect is not owed to such people. French elites today define the deserving French citizen in a way that excludes if not all Muslims, then many. As Chapter 3 shows, French Muslims respond to this exclusion in a variety of ways. Interestingly, while some of their complaints challenge difference-blind republicanism, French Muslim activists—contrary to French elite assessments—are engaged in thoroughly French projects and politics. They are dedicated to their French identity, and their political claims frequently hinge on the French republican triad of liberty, equality, and fraternity.