Legislation, Legal Theory, and Law Enforcement on Rape in Greece, 1922–1976

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Abstract

The legal significance of rape in twentieth-century Greece remains an understudied topic in modern Greek historiography. Drawing on legal and police documents, this article examines changes in perceptions of rape by state authorities over the course of a half century (1922–1976). More specifically, it explores how law professors and the police leadership defined "who is harmed" and "who harms" in the criminal act of rape. The article argues that, although the issue of rape has attracted the attention of legal experts and the police, the latter have directed their efforts to further their own institutional and political agendas rather than toward the protection of victims.

Keywords: criminal law, modern Greece, police, rape, sexual violence

Until the 2000s, discussions about rape in Greece took place mostly in books written by law and criminology professors who aimed to explain the current legislation on rape to students in law and criminology university departments.[1] Other than this, rape and criminal justice in general were non-issues in Greek historiography. Efi Avdela's important book, *For Reasons of Honor: Violence, Emotions and Values in Post-Civil-War Greece* (2002),[2] was the first to take on the task of a historical analysis that employed social history and gender in the context of criminal justice.[3] Avdela's research did not deal with rape but with crimes of honor in postwar Greece; since its publication, more research has been produced in the same direction.[4] However, the history of rape laws in Greece from the perspective of social and political history still remains largely unexplored. It is precisely this gap that this article attempts to fill through a critical historical analysis of legal theory and police discourse on rape in Greece. All in all, this article unpacks legal and law enforcement documents on rape across more than half a century (1922–1976) and shows that although rape attracted the attention of legal experts and the police, the latter directed their efforts to further their own institutional and political agendas rather than toward the protection of victims.

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Of course, feminist legal studies frequently address the ways law regulates women's lives in the public and the private realm, as well as the ambiguous relationship between women and rights/law.[5] Many of these writings can be useful in developing a critical historical analysis of legal texts on rape. Joanna Bourke's *Rape* (2007) presents a thorough critique of the deficiencies of the law in English-speaking countries. She focuses on the social dimension of this crime, attempts to debunk rape myths, and remains suspicious of the law itself, echoing Nicola Lacey's words that "law is coded as masculine through and through. It is male interests masquerading as human interests."[6] A fundamental understanding of rape legislation that has existed at least since Susan Griffin's "Rape: The All-American Crime" (1971) is that laws against rape do not actually protect women but serve other purposes, such as men's ownership of women, racial supremacy, and so forth.[7] In Greece, as elsewhere, the law against rape was included in a chapter of the penal code under the title of "Crimes against Mores" and, as scholars have pointed out, the abstractness of such legal terms more often led to the exploitation of the relevant criminal legislation for the purpose of controlling various social groups, such as the youth, homosexuals, and prostitutes.[8]

As Susan Edwards contends,[9] legal texts and procedures construct the gendered self and produce aspects of our identities, given the power relations that are at work in society. Similarly, the present analysis asserts that rape legislation has more to do with family protection and the control of populations, particularly women, than the protection of women. The first part of this article examines rape laws from the interwar years up until the 1970s. The legal debates revolving around rape during this period offer an insight to understanding the significance of rape for the Greek legislators and jurists of the time. In light of this, the reference to legal theory does not concern a sensu stricto theory but rather the extensive presentation of contradicting interpretations on the law put forth by various law professors and jurists. More specifically, in the first part of the article, I focus on the debates concerning "crimes against mores" in the journal *Poinika Hronika* (Criminal chronicles), which was established by law professors in the 1950s and served as the first attempt to forge a body of legal texts for the use of all sorts of legal experts (jurists, judges, attorneys). In discussing the legal debates from 1952 to 1972, the article will attempt to historicize the social conditions in which these scientific discourses emerged.

The second part of the article deals with a different set of evidence and discourse (police magazines and manuals) by providing police material (analyses, statistics, and data) on rape in Greece from the late 1920s until the early 1970s. Given that the police is the institution that compiles reports on rape, it is a necessary player in rape law enforcement. Scholars have shown that the police consistently refuted rape allegations, either out of a reluctance to charge perpetrators or out of a mistrust of the victims.[10] In this section, I reveal the ways that the police brought rape to the attention of the public and analyzed it under the heading of crimes against public morality. Although the evidence provided in this section of the article comes from different kinds of archives and much of it is fragmentary, I argue that it helps us see how the police understood rape.

Who is Harmed in Rape?

Since the founding of the modern Greek state in 1832, the law on rape has changed four times (in 1834, 1950, 1984, and 2019). In the interwar years, several committees were formed to revise the first 1834 rape law; however, the task was repeatedly postponed. It was not until the end of the Greek Civil War (1949) that the legislation changed with the implementation of the first Greek penal code in 1950. Then, from 1950 until 1974, this new rape law met with public and legal criticism, which formed the impetus for the third law on rape (1984). More recently, in 2019, another revision of the law on rape was implemented.

After the national revolution of 1821, which ultimately led to the formation of the Greek state, in the transitional legislation (1824) rape was not actually defined as a crime but rather considered in the context of "abduction" and "deflowering."[11] The severity of the punishment ranged depending on the magnitude of the offense inflicted on a woman's male relatives. If a widow was "abducted," the perpetrator faced one year in prison. If a virgin was abducted, the sentence could reach five years' imprisonment, and six years in the case of the "abduction" of a married woman. Thus, the women protected by the law were mostly those who were under the custody of their husbands (married) or fathers (virgins). The orientation of this law can be understood if we take into consideration that, according to many historians and ethnographers of Greece, virginity and motherhood represented the quintessence of feminine virtue.[12]

By contrast, the Penal Law of 1834 defined rape explicitly and stated that the victim of rape could be male or female. In addition, the extent of the punishment depended on entirely different criteria, considering the agglomeration of other crimes, such as severe physical injury, murder, or underaged victims. Moreover, the law excluded compensation in favor of the family of the victim, as was the case with the pre-1834 legislation. In practice, however, things were very different. The 1834 legislation was not widely implemented, since in many areas there were not enough courts and in most cases Ottoman jurisprudence still predominated. Throughout the nineteenth century, and into the early twentieth century, the Greek state struggled to maintain its monopoly of power over local and family authorities, who dealt with rape as they had for centuries under Ottoman rule, namely by making financial arrangements. Nevertheless, mores, in their abstractness, served as a bridge between the old and the new regimes. In courts and in society, opinions over who suffered most from rape differed. Was it the family, the community, or the victim themself? Were individual rights or community ethics more important? Greek penal law never actually defined what mores were. So, jurists had to refer to extralegal sources to determine them, such as daily life, religion, and cultural norms.[13]

Undoubtedly the abstract concept of mores played a central part in legal theory in the period under discussion. Although the term mores—in Greek ήθη (*ithi*)—literally means customs, it also had moral implications. In Greek legal theory, mores take on the meaning of morality, ethical norms, or values. Mores, although an abstract evaluative term, constituted the official reference point for completely different offenses in the penal code, such as indecency, rape, pedophilia, adultery, prostitution, and until 1951,

unnatural indecency (referring to homosexual practices between men). Although academic literature has engaged significantly with the concepts of Greek honor, values, and morality in the past,[14] mores have evaded analysis in texts outside the sphere of legal studies. As Georges Vigarello has demonstrated, the concept of mores served as a substitute term for sexual taboo, embodied in the 1810 French criminal law, where a chapter on crimes against mores was forged in a manner similar to the way it occurred in Greece a few years later. As in the Greek text of the law, the French law did not define mores; however, according to Vigarello, "to act against mores meant to damage society in terms of sexual immorality."[15] Law professor Ioannis Manoledakis argued that legislators often embodied concepts such as "mores," "improper," or even "godly" in certain legal clauses usually as a means of increased ideological infiltration.[16]

Morality was ever-present, especially in laws concerning sexual crimes, such as seduction. For example, law 3841/1911[17] stipulated that if a man exploited the inexperience or trust of a juvenile maiden of irreproachable morality and deceived her into engaging in sexual intercourse, he could be punished with six months to one year in prison. The offender could avoid the punishment by marrying the deceived woman afterward. In the late nineteenth and early twentieth centuries, judges were called on to interpret the concept of "irreproachable morality," in each case based on their own perceptions of social ethics and sometimes with the advice of medical experts, such as coroners. Women not only had to cope with men's deceptions but also with male coroners' and judges' suspicions, and thus to fight for their legal rights through a language built on the unwelcoming terrain of morality.

Judges in numerous cases tried rape as a crime that offended public morality, and thus recognized it as a crime against public order and the family. During the interwar years, some law professors began to reconsider the definitions of rape, stating that the modesty of female-victims of rape should not be taken into account, and that rape should be classified as a felony against personhood (rather than morality).[18] Nevertheless, the majority of them were content with the fact that, even after 1950, rape remained the only felony in the penal code that was not prosecuted ex officio, since its implications on the female victim were mostly of a moral status.[19]

Almost immediately after the civil war, Greece enacted a new constitution in 1952 and a penal code in 1950. According to constitutionalist scholar Nikos Alivizatos, the 1952 Greek Constitution was even more authoritarian than the 1864 version.[20] The state was trying to fortify the country against the possibility of a reemergence of fierce internal conflicts, and remained anti-communist in principle for another twenty-five years until the collapse of the military dictatorship (1974). The new penal code contained no surprises; its Chapter 19, called "Crimes against Mores," was still sandwiched between the chapters on crimes against personal freedom and crimes against family. The way these issues were presented in the respective chapters is telling of the position rape held in the offenses against personhood and family.

During the war, even though the family institution was in crisis, the law still deemed men to be the *pater familias*, the "head of the family." According to the civil code, men made all decisions concerning spousal life (article 1387); the burdens of marriage belonged to men, while women were required to provide a dowry (articles 1398–1399, 1406–1437); divorces were rarely granted by the courts in favor of wives;

and adultery remained a criminal offense (until 1982).[21] Building on this foundation, article 336 of the new penal code on rape stipulated that a rape victim could only be a woman and that a husband could not rape his wife.[22] As law experts of the time explained, "in marriage, men do not only have the right to demand sexual intercourse, but also the duty to perform it, under threat of being dismissed otherwise."[23]

Criminal law, as a distinct field of study, developed in Greece during the interwar years,[24] at a time when the great majority of (criminal) law professors belonged to the middle and upper classes.[25] Three of the most noteworthy law experts—Nikos Horafas, Ilias Gafos, and Konstantinos Gardikas (who was director of police forensics and professor at Athens Law School)[26]—created the journal *Poinika Hronika*. In *Poinika Hronika*, the three professors argued for and against the ex officio penal procedure in rape cases. Tracing these debates (from 1952 to 1967) over the appropriate prosecution of rape is important for understanding the intentions of the law in defining which subject was harmed by the crime of rape: women, their families, or the state (in the sense of the organized political community) itself.

According to Professor Giorgos Mangakis, who in 1972 undertook the task of translating the Greek Penal Code for an English-speaking readership:

> The prosecution of offenses, as a rule, is exercised ex officio, that is, upon initiative of a special organ of the state established specifically for that purpose. According to modern Greek theory, the state, representing society, has an interest and a duty in the prosecution of offenses committed . . . In some cases, the prosecution of the offender is considered more harmful to the victim than if the offender were to remain unpunished. This happens in the case of rape, Article 336; in the case of sexual abuse, Article 337; and in the case of adultery, Article 357. Occasionally some of these offenses ordinarily prosecuted upon complaint are prosecuted ex officio . . . whenever the act committed has given rise to public scandal, or has aroused the public interest (Article 344), because then there is no longer any need to try to protect the honor of the victim through denying publicity to the act, or if the act has resulted in the death of the victim (Article 340), because then the seriousness of the offense itself requires prosecution and punishment of the offender. For those offenses prosecuted upon petition, a waiver of the complaint eliminates punishability.[27]

As the above excerpt shows, the Greek legislator considered that women would be doubly harmed if a rape was made public through a trial. In fact, for 150 years (1834–1984), the "fuss"[28] over rape was considered more harmful for the female victim and her family than the rape itself, especially in small, rural communities where anonymity could hardly be guaranteed. Therefore, the law deemed the protection of the victim's honor to be more crucial, or at least equally crucial, to the protection of the victim's mental and physical wellbeing, except in the incidence of death. The law interpreted publicity as the threshold under which the public attorney should judge whether or not the victim's honor had been violated and thus whether or not to proceed with the prosecution. In addition, the victim's honor represented an abstract value, and a protected good that did not merely concern the individual victim but their family, and

sometimes the whole community, in cases where rape was committed by men from a different community.

In all of the above, the possibility of an ex officio prosecution of rape was a crucial matter. To prosecute rapists ex officio practically meant that the public prosecutor was obliged to begin a trial without asking for the victim's opinion, since the law considered the crime to be of grave importance. On the contrary, if rape was to be prosecuted upon complaint, the victim had to mobilize and sue the perpetrator in order to have the trial begin, after the public prosecutor accepted the lawsuit. This legal arrangement on rape prosecution was discussed numerous times after the 1950 penal code and changed at least three times in the following years, in 1960, 1976, and 1984. In contrast to the 1950 penal code, where no ex officio prosecution was allowed for the crime of rape, law 4090/1960 introduced a new element where an ex officio prosecution was necessary in cases that had attracted great "scandalous" publicity. Then again, law 495/1976 returned to the earlier arrangement that excluded the ex officio prosecution, while the new penal code of 1984 allowed again the ex officio interference of the public attorney in rape cases.[29]

In the early 1950s, immediately after the implementation of the penal code, Gardikas was one of the few to argue in favor of the ex officio prosecution of rape. Considering the state a locus of neutrality and impartiality, Gardikas feared that if the law permitted extrajudicial compromises between rape victims and perpetrators, it would either lead to revenge crimes or to financial compensations, which were of course an option only for the wealthy.[30] At this time, sexualized violence, especially in rural Greece, was often discussed in the press as the expression of a parochial violence that kept the country off the track of modernity.[31] Gardikas asserted that giving the public prosecutor the right to act ex officio in rape cases would result in the equality of all citizens before the law and strengthen state sovereignty even at the farthest reaches of the national territory.

Law professors Ilias Gafos and Nikos Horafas, in contrast, argued in favor of a limited response on behalf of the state.[32] In their eyes, the stigma of rape was very powerful and the public prosecutor should not act against the personal will and freedom of the victim, should she want to avoid a court procedure. This special arrangement for rape meant in practice that the crime was rendered not serious. As the feminist legal expert Kaiti Papariga-Kostavara contended years later (2007), these jurists were selectively sensitive toward rape victims and, in effect, their stance gave legal form to a well-established practice of injustice against women.[33]

During the 1960s, this debate found its way through the legislative committees to parliament. Legislative decree 4090/1960 ruled that the ex officio prosecution of rape was allowed in cases when the act had given rise to a "public scandal." The decree once again proved that rape was still mostly perceived as a crime against society rather than individuals. In two court decisions in 1961 and 1963, judges defined "scandal" in practice. One judge ruled that "rape committed in isolated places, and not witnessed by anyone, does not produce 'scandal'" and thus could not be prosecuted ex officio. In another case, where a man battered a two-year old infant and his mother, and then raped the mother in a Chalkidiki village, the court deemed it was a scandal since the village discussed the incident with indignation for months.[34]

During the 1960s, Giorgos-Alexandros Mangakis was the first law professor to speak out against the law on mores.[35] Mangakis contended that rape violated sexual freedom, a clear right, and not mores, an abstract and ever-shifting notion. In his book *Offenses Concerning Sexual and Family Life* (1967), he explained how flimsy the legal infrastructure on public morality was, since it was built entirely on social and moral norms that were subject to constant historical change. According to the young law professor, all crimes should be defined through certain objective characteristics, their objective status. The crime of rape, thus, consisted of two features, sexual intercourse and violence, two acts that were not related to "scandals" and the like, which belonged to the sphere of morality. The legislator, he added, had a mission toward society, not toward ethics. All these years, Mangakis argued, rape existed in limbo between law and ethics, and that is why this felony, in comparison with all others, had a "peculiar character" legally. Mangakis believed that the criminal law of the country rightly followed the spirit of a certain legal "positivism," retaining rationality among all articles of the penal code, with the exception of the felony of rape, where morality infiltrated the legislation and judiciary practice. This was the "paradox" of rape.[36]

For another ten years, until the 1980s, rape law remained untouched. However, criticism was now widespread in and out of law schools, which had once been the strongholds of conservative moralists and legal bureaucrats. Professor Ioannis Manoledakis believed that family law and rape law should be demystified, meaning it should be strictly dealt with in terms of equality and a spirit of legal rationalism, and not in terms of a dated ideology that referred to old-fashioned national and patriarchal views. Manoledakis argued that as Greek society moved from a rural socioeconomic paradigm to an industrial one, the law should adapt to society accordingly. According to him, the entire Chapter 19 on mores should be abolished and rape should be punished as an offense against personal (sexual) freedom.[37]

In the 1970s, the political climate allowed for greater reflection on laws, politics, and ethical norms across Europe and the United States. In 1970s France, feminists demanded the revision of French rape law, which had also focused on the "honor of a woman's family" rather than on a woman as an individual.[38] In a number of countries, including Greece, morality was substituted in legal texts by notions relating to sexual self-definition.[39] In the mid-1970s, in addition to the public criticism against mores that came from below, pioneer feminist legalists such as Papariga-Kostavara cooperated with statesmen and law professors and not only changed the rape law but revisited and redefined the abstract concept of "the interests of the community"[40]—a story that remains to be written in Greek historiography. While the new penal code was under discussion in 1984, some feminist groups appeared with concrete demands: rape should be considered a crime against personal freedom, not morality; rape should be prosecuted ex officio; the restitution of rape through marriage[41] or monetary compensation should not be permitted; non-consensual sodomy on men and women should be considered rape; marital rape should be treated as rape; sexual intercourse should not be reduced to penetration; and sexual abuse should also be considered as rape. The penal code of 1984 (Law 1419), indeed, achieved radical reform. The term "mores" was removed from the title of the relevant chapter and replaced by "sexual freedom" and the ex officio prosecution of rape was finally implemented.

Between the interwar years and the post-World War II decades, legal debates regarding the prosecution of rape coincided with the development of criminal law as a distinct field of study and the modernization of the Greek state. While crimes of sexualized violence gradually came into focus, the varying perceptions over how rape should be prosecuted reflected the multiple levels on which these debates took place (ethical, social, political). The continuous change of this regulation through different laws reflected the state authorities' ambiguous stance toward rape as a "paradoxical" crime on the verge of ethics and law, personal, familial, and community harm.

Who Harms?

Analyzing police work is crucial to understanding rape law since the police are the intermediary between the legal texts and their daily, practical implementation. The police did not just put the law into operation, but also chose when, where, and for whom to make it work. Thus, policemen decided if there were unlawful acts in the first place, chose how meticulous their investigations would be, readjusted the law according to their perceptions, and followed certain strategies regarding offenses against morality. Most of the texts and tables referenced below came from the City Police headquarters and its vice department (restructured in 1927), which was the office responsible for understanding, detecting, and prosecuting rape.[42] These figures, although fragmentary and questionable, deserve some commentary and will allow us to assess police priorities in the daily policing of "morality" over a time span of fifty years.

The first time the City Police presented official figures on rape incidents in the interwar period, they concerned all four Greek cities in which it operated, namely, Athens, Piraeus, Patras, and Corfu. Although Nikos Archimandritis, a senior officer in the vice department, described these numbers as "unquestionable," the data provided for all four cities was relatively low (36 rapes in 1928, 63 in 1929, 41 in 1930, 58 in 1931, and 54 in 1932). Archimandritis's data (56 rapes in 1934 and 61 in 1935), referring to one city alone, was as large as the figures provided previously for all four cities, suggesting that there was not a consistent method of documentation and that the City Police and Archimandritis's data are thus unreliable.[43]

In addition, the criminal law magazine *Arheion Poinikon Epistimon* (Criminal Studies Record) also produced one statistical analysis from the period 1928–1934, provided by Gardikas. Offenses against morality represented less than one percent of all crimes, while at the level of convictions, perpetrators of morality crimes accounted for three or four out of 100,000. Contrary to any of the numbers provided by the police, Gardikas estimated that about 47 men were convicted annually of rape, and another 228 for seducing "daughters of irreproachable morality."[44] However, Gardikas noted that these numbers were not always reliable due to a reluctance to report rape.[45]

It is worth mentioning that this was also the period when authorities discovered statistics as a tool for policing. This might explain why the numbers kept increasing. Over the years, the police improved their statistics skills. Vice director Arisotelis Koutsoumaris noted two rape incidents in Athens in 1927, then seven in 1928, fourteen in 1929 and thirty in 1930, while from 1934 to 1935 rape incidents doubled.[46] Even if

such statistics are accurate, the police numbers did not correspond to the forty-seven convictions nationwide annually that Gardikas referenced. This discrepancy is possibly a result of different offices gathering the relative data or the defective statistical categories that various agencies from the Public Order Ministry or the Justice Ministry applied in such inquiries. Whichever the case, the numbers of recorded rape incidents remained significantly low.

A police report for interwar Greece, produced by the City Police Directorate in the port-city of Patras, conflated rape with all kinds of crimes against honor and morality, such as abuse, adultery, and prostitution.[47] However, as Nikos Archimandritis admitted, the police were entirely occupied with the most important offense against morality, that is, women's prostitution.[48] In 1940, Spiros Paxinos, the director of the Vice and Security Department of Athens who was known for arresting communists and homosexuals, as well as publishing pictures of the latter in his books and the press, wrote: "the vice department's aim is to take care of the moral elevation of the woman prostitute, from a humanitarian point of view."[49] Paxinos meant that the vice department served the common good by saving the prostitutes, and thus policing was not (only) crude form of repression but also interwoven with welfare policies. As a result, although rape did come to the attention of the police in the interwar years, they were busy dealing with other offenses against morality that they considered more important.

Finally, an unofficial statistic found in the personal archive of Koutsoumaris shows numbers of arrests by the department for 1929 and 1930 in Athens. Koutsoumaris's archive indicates that the police kept all kinds of information on these crimes, even if they rarely published such material.

In the interwar years, the vice department was reorganized under the guidance of the British Police Mission working in Greece. The British had been called in to create a new civil police force along the lines of the London Metropolitan Police, in contrast with the pre-existing militarized Gendarmerie[50]—a force that would succeed in gaining access to the most remote neighborhoods and the lower social strata of Greek urban centers and implementing a new type of "scientific policing." Koutsoumaris, one of the most loyal disciples of the British Police Mission and a fan of its methods, often practiced inquiries among the arrested individuals and urged the rank and file of the force to do the same.[51] His motive was to understand crime through getting to know the perpetrators, their habits, their thinking, and their methods. For example, after he conducted interrogations with each of the arrested culprits in all the above crimes (see Table 1), he concluded that the perpetrator's profile was that of "the unwanted,

Table 1. Offenses against morality in Athens, 1929–1930

Year	Rape (attempts)	Seduction	Prostitution	Adultery	Bigamy	Incest	Sodomy
1929	14 (1)	42	40	3	7	0	8
1930	30 (11)	61	59	14	7	2	10

Source: Insults of Mores, Koutsoumaris Archives, Files 83/2 and 83/17, Hellenic Literary and Historical Archive (ELIA).

unmarried, healthy man between twenty and thirty years old, of elementary education and working-class appearance."[52] Women victims, on the other hand, were either housewives or worked as maids. In conclusion, Koutsoumaris confirmed, these types of crimes concerned the working-class masses. Such analyses of arrests constructed the criminal/victim profiles for decades to come and showed how the police data often responded with predetermined categories to the question of criminality, tracing crime to the potential enemies within and the working classes, as well as capturing the "underworld" in stereotypical cultural terms.[53]

During the hectic 1940s, Greece engaged in a war against the invading powers of Italy and Germany, then an armed resistance movement (1941–1945), and after that a civil war (1946–1949). These conditions did not allow the state to keep track of the rapes committed either by the foreign occupation forces or by the right-wing paramilitary forces.[54] During the war-torn 1940s, many women were afraid to report rapes, especially since the majority of the police collaborated with the right-wing paramilitary groups and the occupiers.[55]

Here it should be noted that rape during wartime is in many ways different from rape committed during peacetime. For one, wartime rapes were often committed by perpetrators outside the community, either Greek or foreign, and created a different dynamic than the one I discuss in the rest of this article. Wartime rapes, as well as other sexual assaults, combined with murders, assaults, and all kinds of violent crimes, were directed against the local communities or families that supported or staffed the armed resistance in general or the communist partisans in particular. Collective punishment and rape as a weapon of war were common during the Greek 1940s and especially during the early years of the Civil War.[56] In the 1940s, crime was also under-detected because fighting crime was not the priority due to the emergence of the more pressing matter, that of "political crime" in the civil-war context. In 1945, the vice department, which was responsible for handling rape cases, among others, remained understaffed and, at least in Piraeus, even lacked an office for its archive. The security division considered the vice department's activities to be of secondary importance.[57]

From 1945 to 1952, another British Police Mission operated in Greece,[58] and its monthly reports to London suggested that right-wing paramilitary groups represented a large percentage of the criminals of the time. For example, according to the reports for just a five-month period in 1950, a year after the end of civil war, these armed men took part in more than twenty manslaughters, murders, and rapes.[59] Yet, the police did not keep data on crime systematically and were even less comfortable about publishing it. In a police report from Thessaloniki for 1950–1951, rape is not even mentioned, as if it did not occur at all. The section on crimes against morality refers only to "abuse of minors" and "sodomy."[60]

For both the public and legal experts, the protected value in Chapter 19 of the penal code was the prevailing moral order with regard to sexual practices, and ultimately family and state stability itself.[61] In this era of repression and conservatism, known in historiography as "stunted democracy,"[62] the police unleashed an unprecedented campaign against moral offenses purportedly to protect family values; part of their campaign was to present consistent statistical data on violations of public morality to the public.[63]

After 1955, as in the interwar years, rape cases registered by the police were not catalogued as separate crimes but added on to all sorts of felonies. The only specific data on rape during this period comes from an article in the official journal of the City Police where, in reference to 1960 alone, 85 rapes are mentioned (16 in Athens and Piraeus, and 69 in the rest of the country), suggesting a dramatic drop in the numbers in the country's capital and largest port-city. The report referred to the professions of the arrested perpetrators for all moral offenses: 42 private-sector employees, 95 farmers and stockbreeders, 78 unemployed, 82 workers, and one Roma (*atsigganos*).[64]

Despite the low arrest rates for rape, the police hierarchy seemed extremely concerned with offenses against morality in general. In Patras, the headquarters admitted that "moral" felonies had doubled and tripled between 1955 and 1960; in the same period in Piraeus and Athens alike, these crimes accounted for 60 and 61 percent of all the felonies, respectively. Of course, as is the case with most police statistics by definition, these statistics were not a real depiction of criminality, but of the criminal activity that the police chose to prioritize.[65] According to Sofia Vidali (2007), the postwar penal code strictly defined the criteria of exclusion and repression not only of "dangerous" individuals, but of larger social groups, such as juvenile delinquents, vagrants, beggars, prostitutes, "lazies" (the unemployed), football fans, crooks, psychopaths, and even "anti-socials," who were often arrested for subtle political reasons.[66] Judges Andreas Toussis and Athanasios Georgiou, in their work on the 1950 penal code, wrote that "social order imposes moral limits on the relations between sexes."[67] The same year, Ioannis Georgakis, a jurist, in defense of the penal code, noted that the new legislation "protects homeland, honor, unpolluted family relations and such values."[68] Although such statements might suggest that the law would be very strict when it came to rape, more emphasis was given to the relationship between morality, sexuality, and gender norms than to the protection of rape victims.

In a 1951 manual taught in police academies, officer Giorgos Doukas instructed cadets on the basics of their future profession: "RAPE. Usually performed by young degenerate men who will be known a priori to the police from various cases that unfolded in a village (if they are farmers) or in the city, in brothels or cafés that they haunt (if they are city dwellers)."[69] Police director Archimandritis, accordingly, regularly wrote in a strong moralistic tone (against "modern ethics"), in the *Iatriki Efimeris* (Medical Gazette), the official journal of Greek doctors, and in the official City Police journal.[70] In all these texts, rapists were described as monstrous, immoral, and unfamiliar to the victim, and thus subjects that did not come from the private realm of the family but instead from the unknown and threatening outside world.

Table 2 shows rape statistics from 1968 to 1981 in the four cities of the City Police's jurisdiction.[71] These numbers remained extremely low until 1977, when rape seemed

Table 2. Numbers of rapes in the four cities under the jurisdiction of the City Police, 1968–1981

1968	1969	1970	1971	1972	1973	1974	1975	1976	1977	1978	1979	1980	1981
22	15	21	20	21	6	17	17	17	24	28	31	38	38

Source: Sofia Vidali, *Elegxos tou egklimatos kai dimosia astynomia* [Crime control and public police], vol. 2 (Athens: A. N. Sakkoulas, 2007), 1030–1031.

to almost double, but even then, the figures are similar to the aforementioned statistics from the interwar years. Although in this period rape was incorporated into the police statistics and, as such, was brought to the attention of the law enforcement, once again it seems that rape cases were not a priority for the police even in the postwar era.

Available police statistics reveal—as we can see in other cases and countries too[72]—that rapes were significantly underreported to the police and rarely reached trial.[73] Law enforcement agencies, such as the vice department, compiled statistical tables to provide the state and the public with a clearer picture about crime,[74] but as many historians have noted, it is never enough to look at the data without understanding the motives and the methods of those who gathered it.[75] From the 1920s and until the 1970s, police authorities made rape incidents visible through statistical analyses; however, their perspectives and efforts remained focused on apprehending categories of the population, most often the working classes, which were already targeted by penal law. Across this period (1920s–1970s), the police data on rape are mostly unreliable and most often seem to be incorporated as a small element of the greater category of crimes against morality.

Conclusion

Law remains a regulative language, crystallized in a text that is called to regulate the lives of the following generations, and expresses and disseminates dominant ideologies.[76] Such a view on legal (trans)formations is valuable, since it can show how law changes and the conditions underlying these changes. This article has focused on the ways that the legal-historical discussion on rape in modern Greece occurred alongside broader changes in the history of legal and police institutions, and their perceptions on the crime of rape, over a fifty-year period. As Stephen Robertson noted, law in history should not be examined in its "distinct realm," but based on its modalities in practice.[77]

The article examines the ways professors of law and representatives of the police understood victims and perpetrators. It shows that, for professionals in the field of criminal law and law enforcement, rape came to their attention through various means (scientific debates, legislations, statistical tables, police analyses). The many variable opinions and debates on rape laws urge us to reconsider the fluidity of the law in general and the "peculiarity" of rape laws specifically—that is, the gendered weight of social reality as reflected in the legal sphere.

Although criminal law experts discussed at great length the importance of rape prosecution and the legal nature of crimes against public morality in general, from 1922 to 1976 (but actually from 1835 to 2005, until Law 3500/2006 came into force) marital rape was not legally conceived as a crime and rape in general was understood as a liminal offense, on the verge of ethics and law, a "paradox" between personal and community/familial interests. Such a legal order was mediated by police practice. The police directed the investigations, but also created and reproduced images and discourses about rape, explicitly describing perpetrators as monstrous, "degenerate," and so forth. Even if rape became visible for both areas of law—interpretation and me-

diation—law experts and the police equally and persistently directed their attention and efforts to further their own institutional and political agendas, instead of protecting/defending the interests of the victims.

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About the Author

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Notes

1. See, for example, Angelos Tsigkris, *Viasmos* [Rape] (Athens: A.N. Sakkoulas, 1996) and *Sexoualiki kakopoiisi tou paidiou* [Child sexual abuse] (Athens: A.N. Sakkoulas, 1999).

2. In English, see Efi Avdela, "Emotions on Trial: Judging Crimes of Honour in Post-Civil-War Greece," *Crime, Histoire and Sociétés/Crime, History and Societies* 10, no. 2 (2006), 33–52, https://doi.org/10.4000/chs.371.

3. Shani D'Cruze, *Crimes of Outrage: Sex, Violence and Victorian Working Women* (DeKalb, IL: Northern Illinois University Press, 1998); Kenneth Polk, *When Men Kill: Scenarios of Masculine Violence* (Cambridge: Cambridge University Press, 1994).

4. See Dimitra Vassiliadou, "'Katestramena koritsia': Ithiki, gamiliotita kai dikastiki praktiki sti nisiotiki Ellada, 1914–1940" ["Ruined girls": Morality, marriage and legal practice in insular Greece, 1914–1940], in *Istories gia ti sexualikotita* [Histories of sexuality], ed. Dimitra Vassiliadou and Glafki Gotsi (Athens: Themelio, 2020), 103–122.

5. Among others, see Catherine MacKinnon, "Feminism, Marxism, Method and the State: Towards Feminist Jurisprudence, A Viewpoint," *Signs* 8, no. 4 (Summer 1983): 635–658; Nicola Lacey, "Feminist Legal Theory," *Oxford Journal of Legal Studies* 9, no. 3 (Autumn 1989): 383–394. In Greek, see Yiota Kravaritou, *Fylo kai Dikaio* [Gender and jurisprudence] (Athens: Papazisis, 1996).

6. Joanna Bourke, *Rape: Sex, Violence, History* (Berkeley, CA: Counterpoint, 2007), 410. See also Nicola Lacey, *Unspeakable Subjects: Feminist Essays in Legal and Social Theory* (Oxford: Hart Publishing, 1998).

7. Susan Griffin, "Rape: The All-American Crime," *Ramparts* 10 (1971): 26–35, here 34.

8. David Garland, "Punishment and Social Solidarity," in *The SAGE Handbook of Punishment and Society*, ed. Jonathan Simon and Richard Sparks (London: SAGE, 2012), 23–39, https://doi.org/10.4135/9781446247624. A variety of texts detail how rape legislation was exploited for

nationalist/racist purposes. See, among others, Estelle B. Freidman, "'Crimes Which Startle and Horrify': Gender, Age, and the Racialization of Sexual Violence in White American Newspapers, 1870–1900," *Journal of the History of Sexuality* 20, no. 3 (2011): 465–497, https://www.jstor.org/stable/41305881; Valeria Vegh Weis, "Criminal Selectivity in the United States: A History Plagued by Class and Race Bias," *DePaul Journal for Social Justice* 10, no. 2 (2017): 1–31.

9. Susan Edwards, *Female Sexuality and the Law: A Study of Constructs of Female Sexuality as They Inform Statute and Legal Procedure* (Oxford: Martin Robertson, 1981).

10. Bourke, *Rape*, 389–410.

11. Nikos Paraskevopoulos, "Oi ennoies ton ithon kai tis aselgeias sta egklimata kata ton ithon" [The notions of mores and abuse in crimes against mores] (PhD diss., Aristotle University of Thessaloniki, 1979), 80.

12. Pothiti Hantzaroula, "Public Discourses on Sexuality and Narratives of Sexual Violence of Domestic Servants in Greece (1880–1950)," *Journal of Mediterranean Studies* 18, no. 2 (2008): 283–310, here 298–300; Efi Avdela, Kostis Gotsinas, Despo Kritsotaki, and Dimitra Vassiliadou, "From Virginity to Orgasm: Marriage and Sexuality in Twentieth-Century Greece," *Journal of Family History* (2020): 1–19, https://doi.org/10.1177/0363199020906852; Dimitra Vassiliadou, "The Idiom of Love and Sacrifice: Emotional Vocabularies of Motherhood in Nineteenth-Century Greece," *Cultural and Social History*, 14, no. 3 (2017): 283–300, https://doi.org/10.1080/14780038.2017.1312190. Ethnographers have also discussed sexuality in relation with moral values in rural Greece. See, for example, Peter Loizos and Evthymios Papataxiarchis, ed., *Contested Identities: Gender and Kinship in Modern Greece* (Princeton, NJ: Princeton University Press, 1991).

13. Paraskevopoulos, "Oi ennoies ton ithon kai tis aselgeias sta egklimata kata ton ithon," 15.

14. See John Campbell, *Honour, Family and Patronage: A Study of Institutions and Moral Values in a Greek Mountain Community* (Oxford: Oxford University Press, 1964); Michael Herzfeld, *The Poetics of Manhood: Contest and Identity in a Cretan Mountain Village* (Princeton, NJ: Princeton University Press, 1985); Thomas Gallant, "Honor, Masculinity, and Ritual Knife-Fighting in Nineteenth-Century Greece," *American Historical Review* 105, no. 2 (2000): 359–382, https://doi.org/10.1086/ahr/105.2.359.

15. Georges Vigarello, *Istoria tou viasmou, 16os–20os aionas* [History of rape, 16th–20th centuries] (Athens: Alexandreia, 2001), 196.

16. Ioannis Manoledakis, *Meletes gia emvathynsi sto poiniko dikaio 1978–1999* [Studies on deepening penal justice, 1978–1999] (Thessaloniki: Sakkoulas, 2001), 27.

17. Angelos Bouropoulos, *Poinikos Kodikas* [Penal code] (Athens: Dimitrakou, 1936), 78.

18. Konstantinos N. Kostis, *Ermineia tou en Elladi ishyontos poinikou nomou* [Interpretation of criminal law in effect in Greece], vol. 2 (Athens: Paliggenesia, 1877), 314; Nikolaos Saripolos, *Systima tis en Elladi isxyousis poinikis nomothesias* [System of criminal legislation in effect in Greece], vol. 3 (Athens: P.A. Sakellariou, 1870), 89; Timoleon Iliopoulos and Nikolaos Horafas, *Sytima tou ellinikou poinikou dikaiou* [System of Greek criminal justice], vol. 2 (Athens: D. N. Tzaka and S. Dellagrammatika, 1927), 83.

19. On that matter, see also Dimitra Vassiliadou, "Sexual Harm and Extralegal Settlements in Greece, 1900–1970," *Aspasia. The International Yearbook of Central, Eastern and Southeastern European Women's and Gender History* 18 (2024) [pages missing].

20. Nikos Alivizatos, *Oi politikoi thesmoi se krisi 1922–1974: Opseis tis ellinikis empeirias* [Political institutions in crisis, 1922–1974: Aspects of the Greek experience] (Athens: Themelio, 1983), 203.

21. Efi Kounougeri-Manoledaki, *Oikogeneiako dikaio* [Family law] (Thessaloniki: Sakkoulas, 1998), 10–11.

22. *The Greek Penal Code*, trans. By Nicholas B. Lolis (London: Fred B. Rothman/Sweet and Maxwell, 1973), 159.

23. Konstantinos Gardikas, "Ta egklimata kata ton ithon" [Crimes against mores], *Poinika Hronika* [Criminal chronicles] 2 (1952): 49–63, here 53; Konstantinos Sifnaios and Themistoklis Halkias, *O neos poinikos Kodikas* [The new penal code] (Athens: A.N. Sakkoulas, 1955), 749.

24. Manoledakis, *Meletes gia emvathynsi sto poiniko dikaio 1978–1999*, 25–28.

25. Women represented about three percent of the law students at the time. While the first female judge was appointed in 1959, the first woman law professor did not appear until the 1970s and the first female public prosecutor only in 1975. Ioannis Karakostas, *Istoria tis Nomikis Sholis Athinon 1863–1911* [History of Athens Law School, 1863–1911] (Athens: Law Library, 2014), 63.

26. Efi Avdela, "Racialism and Eugenics in Greek Criminology," *Crime, Histoire and Sociétés/ Crime, History and Societies* 24, no. 1 (2020): 115–139, https://doi.org/10.4000/chs.2708.

27. See Giorgos-Alexandros Magakis' Introduction in *The Greek Penal Code*, 29.

28. Sifnaios and Halkias, *O neos Poinikos Kodikas*, 749–750. It is worth noting, however, that this rule did not apply for adult male victims of rape after 1976, when they were recognized as possible victims of rape. Lambros Margaritis, "I dioksi tou viasmou: Diahroniki antimetopisi tou provlimatos apo ton PN eos ton N. 4855/2021" [The prosecution of rape: The treatment over time of the problem from the penal law to law 4855/2021], part 1, in *Poiniki Dikaiosyni* [Criminal justice] 256 (December 2021): 1690–1693.

29. Manoledakis, *Meletes gia emvathynsi sto poiniko dikaio 1978–1999*, 24.

30. Gardikas, "Ta egklimata kata ton ithon," 53.

31. Efi Avdela, *Dia Logous Timis. Via, Sinaisthimata kai Aksies sti metemfiliaki Ellada* [For reasons of honor: Violence, emotions and values in post-civil-war Greece] (Athens: Nefeli, 2002).

32. Ilias Gafos, "To egklima tou viasmou" [The crime of rape], *Poinika Hronika* 15 (1965): 9–11.

33. Kaiti Kostavara-Papariga, *Viasmos: To egklima, i diki, o nomos kai oi koinonikes antilipseis* [Rape: The crime, the trial, the law and social views] (Athens: Metaihmio, 2007): 170–171.

34. See Court Decision 689/1961, *Poinika Hronika* 11 (1961): 542–543 and Court Decision 221/1962, in *Poinika Hronika* 13 (1963): 175–176.

35. Mangakis, the son of a law professor and member of parliament, studied law in Heidelberg, and taught as an assistant professor there in 1953 and as a visiting professor in Freiburg in 1962–1963. In 1968 he was elected a professor of law in Athens; however, the dictatorship first revoked his election and then arrested, tortured, and convicted him for taking part in the resistance, sentencing him to eighteen years' imprisonment. He was released in 1972 only after the University of Heidelberg also elected him as a professor and his old schoolmate and German Chancellor Willy Brandt intervened to secure his release. For the work and biography of Giorgos Mangakis see Günter Bemmann and Dionysis Spinellis, eds., *Piniko Dikaio—Eleftheria—Kratos Dikaiou: Timitikos Tomos gia ton G.-A. Mangakis* [Criminal law—Freedom—Welfare state: Honorary volume for G.-A. Mangakis] (Athens-Komotini: Ant. N. Sakkoulas, 1999).

36. Giorgos-Alexandros Mangakis, *Ta egklimata peri tin genetision kai tin oikogeneiakin zoin* [Offenses concerning sexual and family life] (Athens: A.N. Sakkoulas, 1967), 5, 10, 32.

37. Manoledakis, *Meletes*, 29, 45.

38. Dagmar Herzog, *Sexuality in Europe: A Twentieth-Century History* (New York: Cambridge University Press, 2011), 166.

39. Nikos Paraskevopoulos and Eftihis Fytrakis, *Aksiopoines sexoualikes prakseis* [Sexual acts liable for punishment] (Thessaloniki: Sakkoulas, 2021), 23–24.

40. Leaving aside the many differences between the two countries, a similar development is described in the US context in Anne Logan, *Feminism and Criminal Justice: A Historical Perspective* (Basingstoke: Palgrave Macmillan, 1998), 148.

41. See Vassiliadou, "'Katestramena Koritsia," 103–22; Carolyn Conley, "Sexual Violence in Historical Perspective," in *The Oxford Handbook in Gender, Sex, and Crime*, ed. Rosemary Gartner

and Bill McCarthy (New York: Oxford University Press, 2014), 207–224, here 209, https://doi.org/10.1093/oxfordhb/9780199838707.013.0012.

42. Achilleas Fotakis, *Astynomia Poleon: Ta prota vimata stin Ellada tou mesopolemou* [The City Police: The first steps in interwar Greece] (Athens: Themelio, 2022), 155.

43. Nikolaos Archimandritis, "Prostasia ton ithon" [Protection of mores], *Astynomika Hronika* [Police chronicles] 13 (1 December 1953): 599–604.

44. Konstantinos Gardikas, "Episkopisi tis egklimatikotitas en Elladi 1928–1934" [Overview of criminality in Greece, 1928–1934], *Arheion Poinikon Epistimon* [Criminal sciences archive] 6 (1939): 173–187, here 176.

45. Ibid., 178.

46. Criminality, 1929–1930, Koutsoumaris Archive, File 79/3, Hellenic Literary and Historical Archive (ELIA).

47. Nikolaos Archimandritis, "I Astynomia Poleon apo tis idriseos tis mehri simeron: Astynomiki Diefthinsi Patron" [The City Police since its foundation: Patras police directorate], in *Astynomika Hronika* [Police Chronicles] 28 (15 July 1954): 1327–1333.

48. Nikolaos Archimandritis, "Prostasia ton ithon" [Protection of mores], *Astynomika Hronika* 14 (15 December 1953): 641–647 and 15 (1 January 1954): 712–714.

49. Spiridon Paxinos, *Egklima, koinonia, astynomia* [Crime, society, police] (Athens: Saliverou, 1940), 153, 176.

50. On the London Metropolitan Police, see Clive Emsley's, *The English Police. A Political and Social History* (Harlow: Longmann, 1996). In existence from 1832 until 1921, the Gendarmerie (*Chorofylaki*) was the longest surviving police force in Greece. After 1921, when the City Police (*Astynomia poleon*) emerged, there was a dual system of policing. Since 1984, the two police forces have ceased to exist, as they were replaced by the Hellenic Police (*Elliniki astynomia*).

51. Fotakis, *Astynomia Poleon*, 28, 125.

52. Insults of Mores, Koutsoumaris Archives, Files 83/2 and 83/17, ELIA.

53. See Dominique Kalifa, *Vice, Crime and Poverty: How the Western Imagination Invented the Underworld* (New York: Columbia University Press, 2019).

54. See Kostas Katsoudas, "Notes on Sexual Violence during the Greek Civil War," in A. Ampoutis et al., eds., *Violence and Politics: Ideologies, Identities, Representations*, (Newcastle-upon-Tyne: Cambridge Scholars, 2018), 238–251.

55. Dimitra Kokkinaki, *Istoriki sygkyria, ekpaideftiki kai dikastiki pragmatikotita sti voreia kai dytiki Peloponniso 1941–1949* [Historical circumstance, educational and judicial reality in northern and western Peloponnese, 1941–1949] (PhD diss., Patras University, 2018), https://doi.org/10.12681/eadd/45032.

56. Dimokratikos Stratos Ellados (DSE), *Ipomnima pros tin Exetastiki Epitropi tou OHE* [Referendum of the Democratic Army of Greece to the United Nations Commission of Investigation concerning Greek frontier incidents], 14 March 1947, https://www.greekhistoryrepository.gr/archive/item/8546?lang=el (accessed 1 May 2024).

57. Andronis Report, Masvoulas Archive, File 102, 24 May 1945, ELIA.

58. Achilleas Fotakis, Giannis Gkolfinopoulos, and Dimitra Lambropoulou, "Securing the Nation: Public Order and State Restructuring," *Kathedra* 12, no. 3 (2022): 94–113.

59. British Police Mission Monthly Reports, June–October 1950, File FO 371/8772, National Archives (UK).

60. Giorgos Vardoulakis, *Pepragmena tis Astynomikis Diefthinsis Thessalonikis kata to etos 1951* [Deeds of Thessaloniki Police Directorate in 1951] (Thessaloniki: Greek Royal Gendarmerie, 1952), 6.

61. Paraskevopoulos and Fytrakis, *Aksiopoines sexoualikes prakseis*, 18–19.

62. Ilias Nikolakopoulos, *I kahektiki dimokratia: Kommata kai ekloges 1946–1967* [The stunted democracy: Parties and elections, 1946–1967] (Athens: Patakis, 2013).

63. Police Headquarters, *Ta 40 hronia tis Astynomias Poleon* [Forty years of the City Police] (Athens, 1961), 22, 37, 55–56, 137–138.

64. Dimitris Mylonas, "Ta adikimata kata ton ithon den dikaiologoun anisihian" [Crimes against mores do not justify any worries], *Astynomika Hronika* [Police chronicles] 204 (15 November 1961): 9877–9880.

65. Sofia Vidali, *Elegxos tou egklimatos kai dimosia astynomia* [Crime control and public police], vol. 2 (Athens: A.N. Sakkoulas, 2007), 675–677.

66. Ibid., 646.

67. Andreas Toussis and Athanasios Georgiou, *Poinikos Kodiks* [Penal code] (Athens: D. Tzakas and S. Delagrammatikas, 1951), 412.

68. Ioannis Georgakis, *Ideopolitikoi orizontes tou sygxronou poinikoi dikaiou* [Ideological and political horizons of modern penal justice] (Athens: A.N. Sakkoulas, 1990), 76.

69. Giorgos Doukas, *Mathimata praktikis astynomias* [Lessons in practical policing] (Athens: S. Karatolos, 1951), 79.

70. See, for example, his texts in 1938 in *Iatriki Efimeris* [Medical gazette], no. 472–480, and in 1953-1954 in *Astynomika Hronika* [Police chronicles], no. 13–15.

71. Vidali, *Elegxos tou egklimatos*, 1030–1031.

72. Martin J. Wiener, *Men of Blood: Violence, Manliness and Criminal Justice in Victorian England* (Cambridge: Cambridge University Press, 2004), 77; Camille E. LeGrand, "Rape and Rape Laws: Sexism in Society and Law," *California Law Review* 61, no. 3 (1973): 919–941, here 941, https://doi.org/10.2307/3479776.

73. On that matter, see also Dimitra Vassiliadou, "Sexual Harm and Extralegal Settlements in Greece, 1900–1970," *Aspasia. The International Yearbook of Central, Eastern and Southeastern European Women's and Gender History* 18 (2024): 64–82.

74. Howard Taylor, "Rationing Crime: The Political Economy of Criminal Statistics Since the 1850s," *Economic History Review* 3 (1998): 569–590, https://www.jstor.org/stable/2598949; Taylor, "The Politics of Rising Crime Statistics of England and Wales, 1914–1960," *Crime, Histoire and Sociétés/Crime, History and Societies* 2, no. 1 (1998): 5–28, https://doi.org/10.4000/chs.989; Howard Taylor, "Forging the Job: A Crisis of 'Modernization' or Redundancy for the Police in England and Wales, 1900–39," *British Journal of Criminology* 39, no. 1 (1999): 113–135, https://doi.org/10.1093/bjc/39.1.113.

75. Robert M. Morris, "'Lies, Damned Lies and Criminal Statistics': Reinterpreting the Criminal Statistics in England and Wales," *Crime, Histoire and Sociétés/ Crime, History and Societies* 5, no. 1 (2001): 111–127, here 116, https://doi.org/10.4000/chs.784.

76. Manoledakis, *Meletes*, 25.

77. Stephen Robertson, "What's Law Got to Do with It? Legal Records and Sexual Histories," *Journal of the History of Sexuality* 14, no. 1/2 (2005): 161–185, here 163, 171, 182. https://www.jstor.org/stable/3704713.