Sexual Harm and Extralegal Settlements in Greece, 1914–1970

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Abstract

Drawing on legal cases from the Aegean islands across the twentieth century, this article charts informal attempts to settle incidents of sexual violence in Greece and their evolution over time. The harm caused to the victims underlined the dominant moral codes, and compensation in money or material goods was not an obvious outcome. The fact that individuals sometimes chose to trade severe physical and moral damage mostly for money did not mean that they refrained from recognizing such harms as serious. On the contrary, such outcomes continued long-established practices in interpersonal dispute resolution, demonstrating the range of possibilities that Greek rural populations had inside and outside of court and their complex relations with the state and the judicial system.

Keywords: court cases, extrajudicial settlements, Greek islands, rural populations, sexual violence

A legal dispute that ended in 1965 with the acquittal of twenty-year-old Nikos,[1] who had been prosecuted for "seduction of a girl" [*apoplanisi paidiskis*] on the island of Santorini, vividly illustrates, alongside other similar cases, the intriguing relationship between Greek rural populations and the modern Greek justice system. The testimonies of Stella, the fifteen-year-old victim, and of her father, offer a sense of ambivalence and contradiction. Despite their firm decision to drop the charges against Nikos, they still accused him of being dishonest, a liar and a swindler who had tried to buy off their silence. Nikos's statement, on the other hand, was simple and a mere three words: "I am innocent." It appears that the victim's family had already settled with the accused, but the anger over the insult had not subsided. Stella, who was thirteen-and-a-half years old when the incident happened, summed up the nature of her multifaceted experience while also painting a clear picture of the world she lived in: her acquaintance with Nikos, a young construction worker who had come to Santorini looking for a job;[2] the casual summertime socialization that gave ample opportunities for girls and

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boys to meet; the escalated flirtation; the exchange of personal items and small gifts; the declaration of love and an informal proposal; and finally, the sexual assault in the fields and the loss of her virginity:

> The following day, I went for a swim, and he brought a boat, . . . and he called us and we got in . . . and he grabbed my glasses and put them on, and he gave me his. . . . The next day, as I was returning from the hairdresser, he was waiting for me and told me, I love you and I will take you. I told him that I was poor, and he said that he wanted me. . . . On the seventeenth of the month, I went to pick grapes and he came over and grabbed me, and took me over to [the] trees and he kept giving me his photo but I wouldn't take it and then he tried to slip it into my top and I was trying to take it out, and then he sang some songs for me and while I was bent down, he threw me on the ground and he did the deed. . . . He forced himself on me and I kept shouting to let me go. Then I could no longer escape, and I saw a spot of blood like a round penny, and I told him I'm different now than I was before. . . . Then I saw him again a couple of days later, while I was on my way to the fish market, and he came and said, Stella, wait and he hugged me, and then we left together. . . . He said: tell no one, and when I come back from military service, I will ask for your hand. I said nothing to my mother. He took me by the arm, we left, and we did the deed again.

Her testimony ends with her disillusionment: the false promise of marriage, her abandonment and Nikos' departure to Athens, her father accidentally finding out what happened and reporting it to the local police, her visit to the lawyer and the medical examiner, the attempts at a financial settlement, and the news spreading all over the small village: "All this took place last August. My dad was looking for a piece of paper in my suitcase and found his address, the photo, and the songs, and he went to the police, who sent him to the lawyer . . . and sent me to the doctor. The news spread everywhere. Then his lawyer . . . came to offer us money. When my father filed the lawsuit, the whole village found out."[3]

These long excerpts offer a vibrant narration of a commonplace story in many sexual offense cases brought before the Greek courts during the twentieth century. Despite having declared their will to drop the charges, the plaintiffs insisted on presenting the accused as guilty. This ambiguity, in pleading for both the guilt of the accused and his acquittal, provides evidence of an out-of-court settlement, a phenomenon with a long history, not limited to twentieth-century Greece. Historiographies of crime and criminal justice repeatedly argue that extralegal practices for resolving interpersonal disputes gradually declined and were replaced by powerful institutions, linking these trends to the transition to modernity and increasing state attempts to monopolize both violence and the administration of justice.[4] Various national examples confirm that such discussions took place around different categories of crimes at different times. For example, in nineteenth-century Britain, Martin Wiener has noted the gradual increase of sexual assault cases brought before Victorian courts, linking this development to a growing public debate around the need to "civilize" British society, which

disapproved of extralegal settlements as practices that "undermined the dignity of the law and its necessary deterrent power."[5] Similarly, Louise Jackson, in her study of child sexual abuse across the same period, argues that British courts radically altered their approach to informal dispute resolution mechanisms. Whereas at the beginning of the nineteenth century they openly encouraged out-of-court financial agreements, even in serious criminal cases, over the course of that century they gradually started to criticize them as practices of lawlessness.[6]

Drawing on court cases from the Aegean islands, this article focuses on out-of-court settlements over "crimes against common morals," a terminology that prevailed in the Greek criminal system until 1984 for all types of sexual acts punishable by law. The legal material consists of 279 cases of rape [*viasmos*], attempted rape [*apopeira viasmou*], seduction [*apoplanisi*], and abduction [*apagogi*], tried between 1914 and 1970.[7] The material entails indictments and trial proceedings, and was collected from four important criminal courts in the Aegean, those of Syros, Samos, Chios, and Mytilene. The article analyzes the complex relations between island populations and the penal system, and the level of importance that courts held for these agricultural societies with their long tradition of customary laws and their own ways of resolving interpersonal disputes using various means of compromise. It examines the years between 1914 and 1970, with a special focus on the 1950s and 1960s, a period marked by the change of the Greek penal law after almost 120 years with the introduction of the new Penal Code in 1950. Despite its focus on the post-war period, the article delves into previous decades to highlight the connections to the past and the recurrent changes over time. As shown below, the phenomenon left a more intense mark in the archival material during the 1950s and 1960s due to the legislative change, although it should be assumed that extralegal settlements were an established cultural practice for the Aegean islands, and probably for other rural communities, long before then.

Addressing the importance of informal transactions which aimed to redress serious criminal offences involving sex is not an easy task.[8] The harm caused to the victims (women and girls more often than men and boys) undermined the dominant moral codes and compensation in money or material goods was neither a direct nor an obvious gesture, since the legal statutes stipulated imprisonment for all sexual offences. The harm, after all, varied across time and place, and the compromise between the two parties was an attempt at "making right" very different and incomparable things: the loss of sexual purity and the debasement of a girl's marital value; the birth of an illegitimate child; the moral castigation of the victim and its family within their community; physical injuries (sometime severe); venereal infections; the trauma, fear, and shame that a sexual assault provoked; the violation of the moral and legal obligation to protect children; and so forth. As it will be argued, in spite of recognizing such harm as serious, individuals sometimes chose to settle sexual offences out of court, in exchange for money, other material benefits, or marriage through long-established informal dispute resolution mechanisms.

This article first discusses the reasons behind the rarity of reported cases of sexual violence across twentieth-century Greece. It then describes the legal framework, its connection with financial agreements, and the effects the new Penal Law (1950)

had in extralegal compromises, investigating the two decades that followed its establishment. Given that financial settlements were not the only options to resolving a dispute, it next addresses some of the different paths that individuals followed to redress sexual harms and elaborates on the discussions around them before the courts, when perpetrators, victims, and their families failed to reach an extra-legal agreement. Finally, the article analyzes financial settlements for crimes against common morals as a practice with a remarkable continuity through time, an interesting point of coexistence of judicial and extrajudicial conceptualizations and practices of justice in twentieth-century rural Greece.

Dark Crimes

There is almost half a century of international scholarship on sexual violence. A brief survey of this vast literature reveals that the topic initially attracted legal historians who researched criminal law reform.[9] Nonetheless, the most influential literature derived from the 1970s feminist commitment to make sense of sexual violence and denounce the long, universal history of patriarchy, with the reaffirmation of sexual violence as an expression of men's domination over women.[10] In the following decades, gender scholars developed more complex and sophisticated approaches to the history of sexual violence. Highlighting power relations and using various primary sources (with police and court records comprising the lion's share), they historicized transformations in the conceptualization of sexual aggression, and associated sexual violence with shifting perceptions of sexuality and gender identities and ideologies. It soon become clear that there was not always a fixed distinction among rape, seduction, kidnapping, assault, and misconduct.[11] The topic fueled vivid historiographies of crime and interpersonal violence, and enriched historical insights into the lives, social values, and gender ideologies of the lower urban and rural strata.[12] As part of the new social and cultural history, it revealed the complex meanings of sexual, gender, and family relations, and their linkages with practices such as courtship, dating, marriage, and reproduction.[13] Despite this very important and rich literature, we still do not know much about the compromises over sexual crimes made by perpetrators, victims, and their families when they choose not to turn to state institutions to resolve disputes, dealing with them instead through customary communal practices. Moreover, Greek historiography has altogether stayed away from the topic of sexual violence, with very few exceptions, deriving mostly from war experiences.[14] However, a few facts are known. No one disputes, for instance, that the number of sexual assaults reported to the authorities represented only the tip of the iceberg. Through my own research in various court documents from the early twentieth century to the late 1960s, it is clear that relevant cases decreased in number as they made their way through the Greek justice system. Indicatively, indictment data from the Cyclades islands for the interwar period showed that out of 119 rape allegations, only twenty-three defendants were tried for rape, and out of these twenty-three rape trials, only seven led to the sentencing of the perpetrators for the specific felony.[15] Even this very limited and rough statistic reveals, first, that few rape lawsuits managed to reach the Greek courts

as such, and second, the even smaller number of rape trials that resulted in the sentencing of the accused men.

Still, these trial statistics reveal only the incidents of sexual assault or misconduct in which the victims took the path of legal action. Many others instead turned to customary justice and hid their offenses from the authorities. Victims and their families had many reasons to follow extra-legal procedures for such incidents, and these reasons were inextricably intertwined with institutional and popular perceptions about which specific sexual act constituted a "crime," the perceived degree of damage caused to the victims (as well as to their families, local communities, and society as a whole), and how likely it was for victims to find justice by reporting the assault to the police. For example, in the mindset of both laymen and lawmakers, the harm caused by the rape of a teenage virgin with a good reputation in the local community was different from that caused to a fifty-year-old married woman, and fundamentally different from that of a woman who lived from prostitution. The rape of a prostitute or a woman who was deemed to behave like one was not considered a crime against morals—social morals were already damaged by her own conduct. An example is the case of Meropi, a sixteen-year-old maid from Paros Island who, in 1935, accused a forty-three-year-old merchant, Manos, of raping her, after dragging her to a deserted area to pick figs. The prosecutor based Manos's acquittal on information about Meropi's previous immoral conduct. Apparently, a close relative who had accommodated her for a month in Piraeus was forced to send her immediately back to her father, "since he was not interested in getting a bit on the side. This incident, combined with the testimony of the witness . . . who testified that, during her short stay on Ios Island, the plaintiff sought to enter into [sexual] relations with just about anyone . . . , and the forensic report confirming that she had lost her virginity a while back and had been repeatedly sodomized, leads to the safe conclusion that she is a girl of low morals . . . trying to conceal her unscrupulousness."[16]

Despite the variances between the official and popular sense of justice, the perception of sexual offences inside and outside courtrooms often overlapped, colored by shared moral values on female sexuality and the sexual immaturity of children, both of which had to be safeguarded. It was precisely this open and constant communication between the law, legal practice, and prevailing social values that ensured, for instance, the acquittal of a rape perpetrator who had attacked a supposedly corrupted woman. For such cases with a predictable outcome, an extralegal settlement would be out of the question. For other cases, though, there were several options available for both perpetrators and victims.

Public Scandal or Private Affair?

Attempts to make extrajudicial agreements, either explicit or implicit, can be traced in court documents throughout the period under study. In the first half of the twentieth century only a very limited number are known, with most of them representing failed settlement attempts. Questioning in a 1915 seduction case of a young servant by her forty-six-year-old master revealed that "he has offered the victim's father both

cash and a promissory note worth 300 drachmas to cover up the event."[17] A few years later in a rape case from Mytilene Island, the judges found a fifty-five-year-old boatman guilty not just because the sixteen-year-old girl pointed her finger at him, "but also because of his former behavior, in trying to prevent his prosecution with money." According to many witness testimonies, he first offered a small sum but eventually went up to "8,000 drachmas in order to drop the charges."[18] Finally, in another rape case from Lemnos Island in 1924, the victim stated that the accused's father "sought to settle the case by offering 120 [Ottoman] liras in compensation." The same proposal was reiterated by the community president a few days before the trial, who "offered [the victim] 100 liras in order to settle and withdraw the lawsuit."[19] In the first half of the century, apart from the few explicit references, most settlements, financial or otherwise, did not leave visible traces in the archival material, remaining among the complaints silently withdrawn before the case reached court. Indicatively, among the 119 rape complaints to the Cyclades Court of First Instance from 1914 to 1940, fourteen were withdrawn with no explanation offered. One can suspect that behind these case discontinuances lay financial settlements and other compensatory agreements between the two parties.

The introduction of the new Penal Code in 1950 transformed judicial practices by implementing two innovations that reveal the range of options available to perpetrators and victims of sexual violence. First, there was a change in the judicial bureaucracy that left a clear imprint in the legal records: the minutes of each trial, while they did not lose their mediated character,[20] became wordier, replacing the summary texts of the early twentieth century. As witness statements become more frequent and longer, references to previous attempts at out-of-court settlements increased. The second change that the 1950 Penal Code brought about was purely legal. Specific sexual crimes, such as the ones dealt with in this article, constituted a significant exception to the law, as the only felonies that were not prosecuted ex officio.[21] The new law, while maintaining this state, introduced an article under the title "instigation of a public scandal": this meant that whenever an incident triggered public attention it had to be brought to court, even if the victims had not filed a complaint with the authorities. Numerous sex crimes across the 1950s and 1960s went to trial to determine whether they caused a "public scandal," that is, whether they damaged social relations, prevailing moral values, and, above all, the authority that ought to protect them—the state. For example, in a 1963 seduction case, although the plaintiffs had withdrawn the complaint, it was eventually heard by Chios Criminal Court to determine whether a public scandal had been caused by the sexual intercourse between a twenty-one-year-old sailor, Takis, and a fifteen-year-old housekeeper, Ioanna. All ten witness testimonies, including that of victim herself and of her father, recounted the identical story: "They already had sexual relations and met in the high school bathroom. The incident took place in the evening, the area was secluded, and they were not caught in an obscene position or undressed. Because of the late hour there was no one around." The court eventually dropped the prosecution since "no public scandal had been caused."[22]

Some additional explanation is needed here in order to understand how the implementation of the new law increased the visibility of something that was certainly happening before but remained obscure in trial documents: the large number of out-

of-court settlements. Interpersonal disputes in Greece, even serious crimes, were not always resolved by the police and legal authorities. This was especially true for rapes and the sexual abuse of children, criminal offences that, as all sexual crimes, were not generally prosecuted ex officio: the victims or their legal representatives, usually the parents, needed to file a lawsuit to bring the perpetrators to justice. By underlining the non-ex officio nature of these felonies, Greek law silently recognized the litigants' right to resolve their differences without legal intervention. In other words, the law itself, in the name of protecting the victims, left room for extralegal settlements.

In terms of the actual law, the reasons that serious crimes such as rape were not prosecuted ex officio in Greece changed over time. In the early twentieth century, it seemed exclusively a matter of common morals, as a trial would publicize the incident and irreparably damage the reputation of the victim and their family. It was up to the plaintiffs to decide whether it was in their best interest to file a lawsuit.[23] For instance, in a seduction case involving a six-and-a-half-year-old girl on Paros Island in 1962, prosecution witnesses noted that it was not the first time that the fifty-two-year-old accused, a painter by profession, had tried to "hurt a small child," but that case did not reach the court since "he was the child of a public servant and his father did not want the incident to be publicized."[24] Two years earlier, the mother of a fourteen-year-old student seduced by a thirty-nine-year-old porter appeared before judges and said: "I went to the director of the local police station and asked him to cover up the incident for the sake of my child's future, which he did. I then picked up the child and we went to our village. I didn't tell my husband anything about what happened because he wouldn't let him go to school anymore."[25] No matter the harm, some individuals chose to cover up the incident, since they believed, in accordance with state laws, that publicizing the sexual assault would be harmful to the victim's public image. An extralegal settlement could also be expedient in cases where the victim's "good" reputation needed to be safeguarded.

However, in the postwar period two prominent Greek penologists, although expressing diametrically opposed views on the non-ex officio nature of rape prosecutions, added new parameters to this old argument. In his 1952 article "Crimes against morals," Konstantinos Gardikas argued against the existing law: "According to due process of law [*de lege ferenda*] the prosecution of rape must be made ex officio," otherwise it "leads to monetary settlements, by which the rich culprit escapes a heavy penalty." Gardikas highlighted the danger of treating rich and poor offenders differently, and then pointed out the modern idea that sexual crimes harmed not only society and the state but also sexual freedom: "Rape is the gravest of crimes against morals, which not merely offends the victim's dignity but also the sexual freedom of the individual. The public interest merits the punishment of rapists for the sake of the general prevention of crime. Public sentiment is offended if the rich man goes unpunished and escapes the penalty of rape in exchange for money, while the poor suffers the heavy penalty of deprivation."[26]

For Georgios-Alexandros Mangakis, on the other hand, the non-ex officio advocacy was directly linked to the need to balance the "social disadvantage that has been created by strengthening the victim's financial position."[27] Mangakis referred to out-of-court financial settlements between the two parties as a common practice in Greece.

While he first affirmed that a prosecution damages the social reputation of the victim, he considered the psychological impact that "the repeated narration of the sexual offence throughout the whole process of prosecution would have on the victim,"[28] making an early reference to the theory of trauma and secondary victimization from a legal perspective.[29] Despite their opposing views, both celebrated legal theorists recognized the large extent of out-of-court settlements in Greece, "which are almost always hidden behind all kinds of lawsuit withdrawals."[30]

Customary Dispute Resolution Over "Crimes Against Morals"

Out-of-court settlements were common practices in Greece, long-established even before the formation of the modern Greek state.[31] Under Byzantine and Ottoman laws, financial compensation settled various acts that were considered criminal offences, and these settlements were so acceptable and common that they were fully incorporated into various regional/local laws, while custodial sentences were regularly exchanged for financial penalties in the laws of prerevolutionary and revolutionary Greece. This was especially true for sexual crimes, particularly for sexual attacks on virgins. The system of redemption was based on female purity, and the restoration of order involved either marriage or repayment for the victim's "deflowering."[32] From 1918 onward, when a relevant new law was implemented in Greece as part of the rationalization of the Greek penal system, compensation for moral damage ("pain and suffering") was systematic and accompanied custodial sentences.[33] In short, counterbalancing the harm suffered by a victim of sexual assault with money was common, both inside and outside the courts and the judicial system. A rape case from Andros Island at the beginning of the twentieth century provides a rough estimate of the financial cost imposed at the time for the loss of virginity. In this case, a witness testified that after the attack, "she saw the victim had scratches on her hands and knees and her clothes, both outer and inner garments were torn, and now in order to marry she already needs to double the dowry."[34]

Since disputes could be settled out of court, many sexual offences were resolved within the community. Rapes in particular were crimes difficult to prove before the authorities. In order to be believed that she had been sexually attacked, a woman had to have an unspoiled reputation in her community and reveal the incident to a third party immediately. Moreover, she had to show serious signs of injury to her body, especially her genitals, and be able to prove that she resisted with all her efforts. A single case seldom combined all these elements, making it difficult for many women to prove that they had been raped.[35] In a 1919 case from Andros Island, the forensic report on the eighteen-year-old victim attested to the use of physical violence, but not to the brutality of the coercion. This medical finding, combined with the fact that no voices were heard during the sexual assault, was enough to stop the prosecution of the twenty-eight-year-old perpetrator, who was eventually charged with kidnapping instead of rape, despite the details in the indictment: The girl was milking her family's livestock at dusk when she felt someone grabbing her by the legs. The assailant tied her hands and feet with his belt and threw her violently to the ground, and soon after,

"throwing dung into her mouth, untied her legs and threatened her with his knife that he would kill her if she screamed, and thus making her unable to defend herself, he attacked her once, having first torn her pants. Then he led her to his house [against her will], saying you know, you are mine now, . . . threatening . . . that he would kill her if she cried out, while he had her hands tied."[36]

It seems that in Greece, as elsewhere, forensic doctors and judges placed the violence inflicted by defendants on a continuum of sexual relations, with one pole occupied by inhuman cruelty and the other by violent sex. When rape was perceived as sex, the perpetrator was treated mildly; when sex was perceived as rape, the perpetrator was dealt with more severely.[37] With the relationship between violent sex and sexual violence being far from self-evident and straightforward, the distinction between rape and kidnapping, in this case, was not firm. Nor was there general agreement among lawyers and judges as to where each act was placed. It is no small wonder, then, that individuals did not always rely on the law and its officials for justice.

Moreover, the performance of justice meant different things to different people. For example, many victims of sexual crimes and their families would find justice in reconciliation marriages throughout the period. There is ample evidence to suggest that a large number of rape and seduction lawsuits were brought to Greek courts only to be dropped, since the perpetrator and the victim had married in the meantime. This was the case of twenty-three-year-old Stefanos and fourteen-year-old Evanthia from Santorini, who appeared as a married couple before the Syros Criminal Court in 1966 in a lawsuit filed a few months earlier by Evanthia's father for her seduction. During the trial, the plaintiff withdrew the complaint and explained the reasons: "I knew nothing about these events, nor did anyone else. It took a long time for my girl to admit them, and finally she confessed to my sister-in-law. . . . Only after I sued him, he began to see sense and married her, and now she is also pregnant. . . . I do not wish to press charges against the accused." The new bride's testimony was similar: "We were in a relationship for eighteen months and I told my aunt in Athens and then my father found out. I'm married to him now and we live well. I do not want him to be punished." The accused, in his brief, albeit meaningful, testimony, underlined the reconciliation that had already taken place between the former opponents: "We made up with the victim and I put a ring on her."[38] I have analyzed elsewhere the repeated attempts of "ruined girls" and their families, usually after a false promise of marriage, to press their corruptor to accept responsibility, attempts which would end with a trial only when all other extralegal attempts had failed.[39] No matter how awkward a marital union based not on free, individual choice, but rather on the threat of criminal prosecution and possibly conviction, sounds to our modern ears, it seems that for these island communities, things were quite different. Holding a realistic stance toward marriage when a girl was "ruined," even more so if she was about to give birth to an illegitimate child, island populations would exert every effort to press the culprit into marriage. Besides, anthropological research has long showed the use of marriage as means for dispute and feud resolution in many parts of the world, including Greece.[40] As elsewhere, the loss of a girl's purity degraded her value in the wedding market, limited her prospects of a proper marriage, and damaged her family's reputation, especially in the case of an unwanted pregnancy, which was not uncommon. Besides, the moral value of female

virginity was a cultural constant in Greece.[41] From our limited historical knowledge on heteronormative sexuality, marriage, and reproduction in Greece, virginity seems to have lost its significance only in the latter part of the twentieth century, perhaps as late as the 1980s.[42] The number of rape allegations that ended due to the marriage between the accused and the complainant are indicative of the effectiveness of this strategy. The fear of being criminally liable forced some accused men to proceed with a marriage. A few relented only when their conviction seemed unavoidable, as was the case with Michael from Samos Island, who agreed in 1915 to marry Katina when indisputable evidence of his guilt was produced just a few days previously in his trial at the Court of Appeal, and two whole years after the rape lawsuit that incriminated him.[43]

Marriage was hence one possible settlement, though not always desirable, at least not by both parties. In 1967, in the trial of Stratos, a thirty-three-year-old butcher from Mytilene Island, who appeared to have ruptured the hymen of eighteen-year-old Marika with his hands in order to force her into marriage, things did not go as planned. He was sentenced to two years and eight months' imprisonment and had to compensate the victim with 14,500 drachmas for moral damage, which mainly concerned the loss of her virginity. At the trial, Marika described the sexual attack, which occurred while she was returning home from the fields, accompanied by her mother:

> At night, while I was returning from work with my mother, the defendant suddenly jumped in front of us, grabbed me by the hair and said, why don't you want me? I told him, let me go and mind your own business, I don't want you. He threw the basket with the scythes I was holding and made various gestures at me and kissed me, he attacked me and threw me to the ground and tried to put his fingers inside my genitals. In the end, he tore my panties and put his hands in my vagina, and I was covered in blood. . . . Meanwhile the accused was already walking away, saying now you have to take me, whether you want to or not. For two or three years he was messing around and asking me repeatedly to become his wife, but I did not want him because he is not a good man.

Reconciliation through marriage was not accepted by her and her close kin, despite the incalculable damage she, and by extension they, had suffered. Her mother made it clear at the trial: "We did not want him as a groom, my daughter does not like him and also because we worry that he will act even worse once we take him in."[44]

Sexual assault could also incite further interpersonal violence. Research on self-redress practices in postwar Greece has highlighted the large number of "crimes of honor" that revolved "around marriage (as an expectation or a fact) and sexuality."[45] Similarly, criminal proceedings in a rape indictment from 1919 on Mykonos were eventually suspended after "the accused was murdered by the brother of the rape victim in Athens."[46] It is also evident that many fathers, according to their own statements, reported incidents to the police to avoid taking the law into their own hands over the sexual abuse of their child; equally, however, many did not refrain from a violent response. A father of an eleven-year-old boy in a seduction case attested that he "took his child to the doctors in Mytilene and they discovered the accused's bad be-

havior. He [the perpetrator] came back to the village and to my house after [I filed] the complaint asking for forgiveness. It is true that I beat him with all my soul."[47] Thomas Gallant's research on the Ionian Islands has shown how during the nineteenth century the local population increasingly made use of the British courts in their effort to reduce interpersonal violence.[48] Similarly, legal discussions from the early twentieth century advocated the increase in compensation payments for "pain and suffering" to offer a counterweight to the still prevailing self-redress practices across the country: "Since all heinous acts provoke in the soul of the offended individual such a vivid outrage and such an uncontrollable urge for direct self-redress for the harm, only the possibility of channeling this urge via legally established channels and the lawful way of achieving an adverse psychological state ensure that there will be no resorting to self-redress practices."[49]

In some cases, though, those affected did both: they reported to the police authorities and resorted to interpersonal violence. In a 1964 incident, once news spread among the small community of Andros that a twenty-eight-year-old male schoolteacher would regularly ask a thirteen-year-old female student to make him coffee in his room, only to caress and kiss her, the girl's father, along with another villager, meted out an exemplary punishment to the perpetrator by beating him in public view. His removal from the teaching position and the beating were eventually his only punishments, as the plaintiff-father was forced to back down in court. As he explained: "He did not ruin my girl. . . . I let it go because I have seven children and I had to do it to avoid the expenses. Of course, I cannot brush over the insult, no matter what." [50] Interpersonal violence has been studied by historians and anthropologists in Greece in relation to the concept of honor. Although such scholarship does not focus specifically on sexual violence, it examines how violence constructs social relations and mobilizes specific redress practices. Extra-legal conceptualizations and practices of justice include retribution through escalated violence, but also compensation/redress through the formation of social alliances which restore the disturbed balance.[51] However, the father's statement sheds light on an additional reason for abstaining from legal action. The cost of a lawsuit, especially for those who would have to travel from other islands to the seat of the criminal court, was often prohibitive for the majority, who came from poor households. In this specific case, the fact that the girl was not "ruined" perhaps made it easier for the father to take the decision to back down.

Conflicting Scenarios

What happened to the cases that eventually went to trial, revealing the failure of previous settlement attempts? In a 1965 incident of sexual abuse of a five-year-old girl where the perpetrator was an eighteen-year-old farmer, the victim, the accused, his family, and part of the community made repeated but unsuccessful attempts at financial redress. The child's mother described them in her testimony: "The lawyer of the accused . . . called us one day on the phone, proposed a settlement and offered 15,000 drachmas to my husband, but he refused. They even asked the mayor to convince us to compromise. One rainy day, the father of the accused came to our house, days after

the incident, and with tears in his eyes begged us to drop the lawsuit. My parents were also present. Even our relatives mediated."[52] Inside the courtroom the relevant testimonies were divided into two conflicting scenarios: plaintiffs referred to the extralegal attempts at mediation as evidence for a conviction while the defendants claimed they were proof of blackmail.[53] For the victims and their families, all previous settlement proposals proved that the accused was trying to buy their silence, and presented them before the judges as informal confessions, thus as evidence of guilt.

In most cases, but not always, offers involved cash. In 1948 the father of a ten-year-old boy from Mytilene noticed "a pimple on his son's bottom" and the doctor confirmed that he had syphilis. A local musician also "suffering from syphilis" was brought to court, charged with seduction. The boy's father was confident of his guilt, since the accused "suggested that we settle by offering 500,000 drachmas. In my opinion, if the accused was innocent, he would not have offered to compromise." This proposal was confirmed by another prosecution witness, who clarified that the perpetrator would secure this sum by "selling his radio," an electrical appliance that would have been a luxury item for rural households at that time.[54] Similarly, in a sexual offence case that scandalized the small community of Fournoi Island, the wife of the accused, a worker, repeatedly approached the pregnant victim and her father to settle. The attempts at reconciliation were also made by important community officials, such as the policeman and the harbormaster, and eventually were recognized as aggravating factors for the sentencing of the fifty-one-year-old perpetrator to five years' imprisonment.[55]

Many of the accused employed this common defense strategy when claiming that the plaintiffs repeatedly asked for financial compensation, threatening to file a lawsuit. In 1936, Eleni pressed charges against the magistrate of Amorgos Island, testifying that "she was forced into sexual intercourse which left her pregnant," but she failed to convince the judges. The forensic report showed, despite her allegations that she had sex only once in her life, that she had "repeatedly engaged in sexual activities" and that her advanced pregnancy did not match the date on which she indicated the attack took place. The judges acquitted their colleague, convinced that Eleni and her relatives were lying when identifying the magistrate as her corruptor, in an effort to blackmail him and extort money or property.[56] The unequal dynamics of power between the two parties, one being a magistrate, the other a maid, significantly reduced the chances of the latter winning the legal dispute. By presenting themselves as unfortunate victims of blackmail, perpetrators drew on the dominant heterosexual culture and the prevailing social values in Greece that women only gave men sexual access for something in return: whether that was marriage or material goods, in this case money.[57] This notion also aligned with a number of other prejudices against women who sued men for sexual assault and demanded their legal punishment: that they were liars, or immoral and "easy" and therefore simply were having sex for money.[58] This was the rumor repeated many times before the judges on Chios for fourteen-year-old Penelope, who sued in 1954 an eighteen-year-old farmer for seduction. One of the many witnesses testified that "it has long been said that the victim has been having intercourse with various people." He then shared his view with the judges: "she blames the accused in order to blackmail him and take money because he is wealthy."[59] When plaintiffs responded

to these accusations, they underlined their moral standing in the community, which would preclude such behavior. In a seduction case, the mother of a fourteen-year-old apprentice tailor, who sued in 1959 his employer, strongly reacted to the accusations that she was a blackmailer who wanted to imprison the defendant for a crime he had not committed: "the defendant called me a 'pimp' and my husband a 'trafficker.' The child is of good morals, and I dare you to ask around about me and my family. We have been honest; we do not love money and we did not ask the accused for money." Indeed, as it became clear from the discussions that took place in court, they did not ask for money to drop the case, but for the means to secure their son professionally, that was "to inherit the little shop and the sewing machine."[60]

This story, one of the few cases involving boys in my sample, highlights one of the differences in the perception and treatment of sexual offences against girls and boys. Had the victim been an unmarried woman, the demand for money might have been legitimized in the name of her need for a higher than usual dowry.[61] It also reveals that settlement proposals could be made not only by the perpetrator's circle but also by the victim's family. Indeed, they were so frequent among community practices that they shared much in common with other regular financial negotiations. In a rape case from 1927, the father of the sixteen-year-old victim visited the local café to ask his fellow villagers how to handle the incident. A forty-year-old landowner described what happened: "When I asked him about his case he said, what do you think? Should I settle? and I said this was a good idea. Then the defendant came forward and I suggested he settle, and he assigned me to ask about the demands. Then I found [the victim's father] again . . . and he said he wanted half of the mill." But the plaintiff did not stop there, and then demanded "also 10,000 drachmas and a piece of land." Rumors in the village painted him as extremely avaricious, "capable of selling even his conscience to get money." His greediness appeared to be the reason behind the failure of the negotiations which, judging by the twenty-four prosecution witnesses who testified at the trial, involved almost everyone in the village.[62]

The common ground for the opposing scenarios of "proof of guilt" and "proof of blackmail" was that inside the courtroom both prosecution and defense witnesses openly condemned financial settlements. The ambivalent attitude of Greek rural populations, which both disapproved of and followed customary behavioral patterns in equal measure, can be linked to the marginal morality of financial compensation on issues that involved sexuality—even sexual violence. It also seems true that these rural communities operated selectively: while they accepted money as a sufficient form of compensation outside the formal legal system, they would protest that they didn't want or need it when they were in court.

The above incidents reveal the complex web behind extralegal settlements, which sometimes involved just about everyone in the community. For example, in a 1959 seduction incident, the thirty-three-year-old gardener, after he "had finished the deed, told her to say nothing to anyone, for he would slay her, and eat her guts," but the nine-year-old victim immediately told her grandmother what had happened. The culprit was sentenced to almost seven years' imprisonment, despite "calling the whole village to talk to [the girl's parents], offering money to withdraw the complaint."[63] Frequently, notable persons of some prestige within the community mediated a dispute,

in some cases the mayor, in others the community leader, performing roles clearly included in their duties as local representatives of the state and the people: to restore social order and bring peace to the social relations that had been brutally rocked by a sexual crime. In a 1933 seduction case after a false promise of marriage in a village on Chios, the leader of the community testified that he unsuccessfully tried to persuade the twenty-one-year-old farmer to marry the disgraced nineteen-year-old girl, since he perceived this mediation as one of his core duties before the community: "nine days after the incident, the victim's father called me and told me that his daughter had been forced into intercourse by the accused and asked me to reconcile the case as the president of the village, which I am, in other words to urge the accused to take his daughter and avoid the lawsuit."[64] Elsewhere, as already stated, local policemen or other important state officials mediated to persuade perpetrators and victims to settle with marriage, money, or other material goods, a fact that strongly suggests that out-of-court settlements were not acts of "lawlessness," but acceptable practices for the restoration of social order. Other incidents indicated the increasing use of lawyers in one of their current core responsibilities, which is their mediation for out-of-court dispute resolution. In a seduction case from 1938, a fourteen-year-old maid testified that "the accused promised her brother that he would give her 20,000 drachmas and this is why she first withdrew the lawsuit, but then he gave her just 9,500," which she spent on lawyers and other legal expenses. Her lawyer, for his part, acted as an intermediary between the plaintiffs and the accused, advising the first "not to rush into the settlement, if they wanted to get more money."[65] Finally, settlement proposals were regularly made by the perpetrator himself[66] and his close kin (his mother, father, and even wife)[67] or fellow villagers and family friends,[68] who approached the victim's family and undertook the task of mediation so that the dispute would not be taken before a court. These processes conform with the noninstitutional, intracommunal nature of the practice.

Conclusion: Different Paths to Restoring Order

To conclude, this article deepens our understanding about legal procedures, extralegal settlements, and their social implementation regarding sexual crimes in the Greek islands between 1914 and 1970. Throughout this period, extralegal settlements were consistently present, either explicitly or implicitly. Sometimes they took place in tandem with criminal court hearings, demonstrating the failure to resolve disputes out of court. At other times, they interrupted the judicial process as the complainants withdrew their suits.

As long-established practices, out-of-court settlements were fully incorporated in the functioning of rural populations and were so legitimate in community ideology that they often involved state officials.[69] Important men of some prestige mediated to resolve interpersonal disputes, even when they involved sexual crimes that undermined predominant moral values, existing marital strategies, and female and child sexuality, both of which had to be safeguarded. Out-of-court settlements restored social order between individuals who continued to interact in a variety of ways within

these small communities and resolved interpersonal disputes more quickly and quietly: victims and perpetrators retained control of the outcome through negotiation, spared themselves further exposure in the public arena, and avoided the monetary costs of a trial (commuting, lawyer and court expenses). Perpetrators admitted guilt by "paying for whatever damage they had done," avoiding possible vigilante justice and imprisonment, while victims and their families received compensation for the harm they had suffered with marriage, money, and other material goods. In other words, individuals acted as they always do: according to available possibilities. Bringing a case of sexual assault before the police and legal authorities was just one option, a possibility individuals weighed based on various factors: according to their image and reputation within the local community; their economic standing; because they heard that someone else had found justice in this way; or because a lawyer came to the village and advised them accordingly. Another possibility, equally well known and extremely common, was out-of-court settlements. Their appeal can be linked to long-established social and cultural conceptions of law and justice, especially in rural areas, and their ability to function in tandem with the courts of law. While legal practices in other European states reveal greater state intervention and greater use of the courts to resolve disputes, in the case of modern Greece, extralegal patterns of conflict resolution remained prevalent for most of the twentieth century, undermining the progressive modernization argument for increasing state monopolization of power.[70]

The conceptualizations of criminalized sexual violence underline the rivalries between formal legal practice and informal community justice and their capacity to exist and accommodate one another. As documented by postwar trial proceedings at least until the late 1960s, most sexual assault cases that went to trial were ex officio, while the victims declared, without explaining why, that they did not wish to press charges; all these cases, without exception, led to acquittals, even when their scandalous repercussions in the local community became evident during the hearing procedures. It appears, therefore, that judges, jurors, and litigants continued to show their commitment to long-established extralegal settlement practices. They were not always successful—after all, the material reveals only the efforts that failed, with the victims and their families choosing to go to trial. Still, these cases suggest the persistence of out-of-court settlements over time and confirm their validity as dominant cultural modes for resolving interpersonal disputes, at least in rural Greece, with the tolerance of local judicial officials.[71]

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Notes

1. All names referred to in this article, unless publicly known, are pseudonyms.

2. In summer 1956, Santorini was hit by a 7.5-magnitude earthquake, which destroyed many houses and public buildings. Ten years after the event, extensive reconstruction works continued, making the island attractive for builders from all over Greece.

3. State Archives of the Cyclades Islands, Criminal Court of Syros [hereafter CCS], Proceedings 1962–1965, case 22-26/1965.

4. Ideas drawing directly from Norbert Elias's and Max Weber's grand schemes; see Norbert Elias, *The Civilizing Process: Sociogenetic and Psychogenetic Investigations*, ed. Eric Dunning, Johan Goudsblom, and Stephen Mennell (Oxford: Blackwell, 2000); Max Weber, *The Protestant Ethic and the Spirit of Capitalism*, ed. Talcott Parsons and Anthony Giddens (London: Routledge, 2001).

5. Martin J. Wiener, *Men of Blood: Violence, Manliness, and Criminal Justice in Victorian England* (Cambridge: Cambridge University Press, 2006), 86.

6. Louise A. Jackson, *Child Sexual Abuse in Victorian England* (London: Routledge, 2000), 38.

7. The trial documents in the Greek court archives are very scattered and uneven. As far as the twentieth century and the Aegean islands are concerned, the General State Archives hold material from 1914 onward. All manuscripts analyzed in this article were transcribed by Martha Vasili and Thanos Varverakis on behalf of the Brintima research project. I would like to thank both for their contribution to this work. The *Brutal Intimacies: A History of Rape in Modern Greece, 1900s–1960s* three-year research project (Brintima), was supported by the HFRI between 2021 and 2023, and collected, processed, and analyzed legal codes, court cases, press cuttings, and warfare incidents to reveal how individuals, families, communities, and the state acted to regulate sexual offences.

8. Karen Dubinsky notes the difficulty of understanding the importance of economic negotiations within this sexualized context, in *Improper Advances: Rape and Heterosexual Conflict in Ontario, 1880–1929* (Chicago: University of Chicago Press, 1993), 21–22.

9. Georges Vigarello, *A History of Rape: Sexual Violence in France from the 16th to the 20th Century* (Cambridge: Polity Press, 2001); Shani D'Cruze, "Sexual Violence since 1750," in *The Routledge History of Sex and the Body: 1500 to the Present*, ed. Shara Toulalan and Sarah Fisher (New York: Routledge, 2013), 444–460.

10. Susan Brownmiller, *Against Our Will: Men, Women and Rape* (London: Secker and Warburg, 1975).

11. Dubinsky, *Improper Advances*; Mary E. Odem, *Delinquent Daughters: Protecting and Policing Adolescent Female Sexuality in the United States, 1885–1920* (Chapel Hill, NC: University of North Carolina Press, 1996).

12. Judith R. Walkowitz, *City of Dreadful Delight: Narratives of Sexual Danger in Late-Victorian London* (Chicago: University of Chicago Press, 1992); Anna Clark, *Women's Silence, Men's Violence: Sexual Assault in England, 1770–1845* (London: Pandora, 1987); Shani D'Cruze, *Crimes of Outrage: Sex, Violence and Victorian Working Women* (London: UCL Press, 1998); Jackson, *Child*

Sexual Abuse; Stephen Robertson, *Crimes Against Children: Sexual Violence and Legal Culture in New York City, 1880–1960* (Chapel Hill, NC: University of North Carolina Press, 2005); Joanna Bourke, *Rape: A History from 1860 to the Present Day* (London: Virago, 2007). For a global (and political) history of sexual violence, see Joanna Bourke's recent *Disgrace: Global Reflections on Sexual Violence* (London: Reaktion Books, 2022).

13. Sharon Block, *Rape and Sexual Power in Early America* (Chapel Hill, NC: University of North Carolina Press, 2006); Stephen Robertson, "Making Right a Girl's Ruin: Working-Class Legal Cultures and Forced Marriage in New York City, 1890–1950," *Journal of American Studies* 36, no. 2 (2002): 199–230, https://doi.org/10.1017/S0021875802006813.

14. For the Greek Revolution (1821–1828), see Katerina Mousadakou, "Violence Against Honour: Shame and the Crime of Rape in the Age of the Greek Revolution (1821–1828)," in *Shame, Blame and Culpability: Crime and Violence in the Modern State*, ed. Judith Rowbotham, Marianna Muravyeva, and David Nash (New York: Routledge, 2013), 141–151; Christos Loukos, *Mia syntomi istoria tis Ellinikis Epanastasis* [A short History of the Greek Revolution] (Athens: Themelio, 2023); Vaso Seirinidou, *Viaioi kairoi: Egklima, koinonia kai thesmoi stin epanastatimeni Ellada* [Violent Times: Crime, Society and Institutions in Revolutionary Greece] (Athens: Themelio, forthcoming), with extensive bibliographical references.

15. Data gathered from CCS, Indictments 1922–1940.

16. CCS, Indictment 525/1935.

17. CCS, Indictments 444/1915, 503/1915.

18. State Archives of the Cyclades Islands, Aegean Islands Court of Appeal (hereafter ACA), Indictments 29 and 184/1924.

19. State Archives of the Cyclades Islands, Criminal Court of Mytilene (hereafter CCM), Proceedings, case 14-17/1924.

20. For all kinds of mediations in judicial practices in 1950s and 1960s in Greece, see Efi Avdela, "I martyriki katathesi: Atomikes kai syllogikes diastaseis tis mnimis sta dikastika arxeia" [The Testimony: Individual and Collective Dimensions of Memory in Judicial Archives] (unpublished paper presented at the one-day conference "Dikastika (thesmika) arxeia: Prosopiki kai koinoniki mnimi" [Judicial (Institutional) Archives: Personal and Social Memory], École française d'Athènes, 15 April 2010).

21. The term ex officio in legal contexts means that the district attorney is required by law to immediately prosecute a criminal action without the need for the offended parties to file a lawsuit beforehand. In contrast, for non-ex officio prosecutions, the individuals harmed must first file a lawsuit to initiate the legal procedure. On the non-ex officio character of sexual crimes in Greek law, see Achilleas Fotakis's contribution in this issue of *Aspasia*: "Legislation, Legal Theory and Law Enforcement on Rape in Greece, 1922–1976."

22. State Archives of the Cyclades Islands, Criminal Court of Chios (hereafter CCC), Proceedings 1962–1964, case 8-12/1963.

23. Michael Ailianos, *Egklimata kata ton ithon: Apoplanisis* [Crimes against morals: seduction] (Athens: n.p., 1916), 89–90.

24. CCS, Proceedings 1962–1965, case 4-6/1962.

25. CCC, Proceedings 1960–1961, case 12-13/1960.

26. Konstantinos Gardikas, "Egklimata kata ton ithon" [Crimes against Morals], *Poinika Chronika* [Penal chronicles] 2 (1952): 49–52, here 52. On Konstantinos Gardikas, see Efi Avdela, "Racialism and Eugenics in Greek Criminology: The Case of Konstantinos Gardikas (1896–1984)," *Crime, Histoire & Sociétés/Crime, History & Societies* 24, no. 1 (2020): 115–139.

27. Georgios-Alexandros Mangakis, *Ta egklimata peri tin genetision kai tin oikogeneiaki zoin*: *Dogmatiki erevna kata ton imeteron Poinikon Kodika* [Crimes Concerning Sexual and Family Life: Doctoral Research on our Penal Code] (Athens: Sakkoulas, 1967), 33.

28. Ibid.

29. "Rape trauma syndrome" was introduced explicitly by the nurse Ann Wolbert Burgess and the sociologist Lynda Lytle Holmstrom in 1974, see Bourke, *Disgrace*, 171–189.

30. Mangakis, *Crimes Concerning Sexual and Family Life*, 36–37.

31. Nikolaos I. Pantazopoulos, *I dikaiodotiki politiki kata tin Epanastasi kai tin Kapodistriaki periodo (1821–1832)* [Judicial Policy during the Revolution and the Kapodistrian Period (1821–1832)] (Thessaloniki: Aristotle University of Thessaloniki, 1978).

32. The compensation was set to help the stigmatized victim to marry; see Mousadakou, "Violence against Honour," 146; Seirinidou, *Viaioi kairoi.*

33. A. Efthymiou, "Psichiki odinin" [Mental suffering], *Arxeion Poinikon Epistimon* [Criminal Science Archives] (1937), 319. My thanks to Achilleas Fotakis for bringing this publication to my attention.

34. CCC, Proceedings 1914, case 22-23/1914.

35. For similar notions in other national examples, see Shani D'Cruze, "Approaching the History of Rape and Sexual Violence: Notes towards Research," *Women's History Review* 1, no. 3 (1992): 377–397, here 389, https://doi.org/10.1080/09612029300200016.

36. CCS, Indictment 359/1919.

37. As Sharon Block has testified for the US in her book *Rape and Sexual Power*, 16–52.

38. All experts CCS, Proceedings 1966–1967, case 5-6/1966. A "marriage arrangement," known in contemporary literature as "restorative" marriage, appears also in rape cases (see, for instance, CCS, Proceedings 1954–57, case 15-16/1955), as a continuation of a long-established practice since the early modern period.

39. 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.

40. Especially for Greece, several anthropological works have underlined the importance of restorative marriages, especially in "feuding societies." See Ourania Astrinaki, *Taftotites, via, istoria stin oreini dytiki Kriti* [Identities, Violence, History in Western Mountain Crete] (PhD diss., Panteion University, Athens, 2002); Aris Tsantiropoulos, *I vendetta sti synchroni oreini Kriti* [Feud in Modern Mountain Crete] (Athens: Plethron, 2004).

41. Virginity was protected in all sexual crimes under Byzantine, Ottoman, and regional laws; whether the act was violent was not of legal interest. M. Tourtoglou, *Parthenofthoreia kai evresis thisavrou: Vizantion-tourkokratia-metepanastastikoi xronoi mexri kai tou Kapodistriou* [Deflowering and treasure finding: The Byzantium–Turkish rule–post-revolutionary times up to the Kapodistrias times] (Athens: 1963); Seirinidou, *Viaioi kairoi*.

42. Efi Avdela, Kostis Gotsinas, Dimitra Vassiliadou, and Despo Kritsotaki, "From Virginity to Orgasm: Marriage and Sexuality in Twentieth-Century Greece," *Journal of Family History* 45, no. 3 (2020): 315–333, https://doi.org/10.1177/0363199020906852.

43. ACA, Indictment 91/1915.

44. All excerpts, CCC, Proceedings 1965–1967, case 13-15/1967.

45. Efi Avdela, *"Dia logous timis": Via, synaisthimata kai aksies sti metemfyliaki Ellada* ["For Reasons of Honor": Violence, Emotions and Values in Post-Civil War Greece] (Athens: Nefeli, 2002), 42.

46. CCS, Indictment 358/1919.

47. CCC, Proceedings 1957–1959, case 5-7/1958.

48. Thomas W. Gallant, *Experiencing Dominion: Culture, Identity and Power in the British Mediterranean* (Notre Dame, IN: University of Notre Dame Press, 2002).

49. Efthymiou, "Psichiki odinin," 319.

50. CCS, Proceedings 1962–1965, case 7-10/1964.

51. For a recent review of articles on historical and anthropological notions of violence, insult, and redress in Greece, see Katerina Rozakou and Eleni Gara, eds., *Ellinika paradoxa: Patronia, koinonia politon kai via* [Greek Paradoxes: Patronage, Civil Society and Violence] (Athens: Alexandria 2013), 297–481. On controlled middle-class violence and the ritualized practice of dueling in Greece, see Dimitra Vassiliadou, "Masculinity on Stage: Dueling in the Greek capital, 1870–1918," *Aspasia: The International Yearbook of Central, Eastern and Southeastern European Women's and Gender History* 13 (2019): 12–30, https://doi.org/10.3167/asp.2019.130104.

52. CCC, Proceedings 1960–1961, case 6-8/1961.

53. On the "blackmail myth" in previous historical periods, see Laurie Edelstein, "An Accusation Easily to Be Made? Rape and Malicious Prosecution in Eighteenth-Century England," *American Journal of Legal History* 42, no. 4 (1998): 351–390, https://doi.org/10.2307/846040.

54. All excerpts: CCC, Proceedings 1948–50, case 5-9/1948.

55. CCS, Proceedings 1969–81, case 3/1972.

56. Court of First Instance of the Cyclades Islands (hereafter FIC), indictment 2/1936.

57. What historian Christine Stansell calls "the barter system between the sexes," cited in Dubinsky, *Improper Advances*, 72.

58. On rape myths, see Bourke, *Rape.*

59. CCC, Proceedings 1954–56, case 12-16/1954.

60. All excerpts: CCS, Proceedings 1958–61, case 14-15/1959.

61. Out-of-court negotiations took place regardless of the gender of the victim. Although the material does not lend itself to statistical treatment, the gender ratio seems to be maintained in the negotiations: in all cases that reached the criminal courts, there were more than twice as many girl victims as boy victims, and the same goes for the settlement cases.

62. All excerpts: CCC, Proceedings 1927, case 20-26/1927.

63. CCM, Proceedings 1958–59, case 6-7/1959.

64. CCM, Proceedings 1933, case 2-14/1933.

65. All excerpts: CCM, Proceedings 1938, case 10-13/1938.

66. CCC, Proceedings 1940, case 11-12/1940.

67. CCS, Proceedings 1962–65, case 4-5/1963; CCC, Proceedings 1951-53, case 6-8/1953.

68. CCM, Proceedings 1959–60, case 6-9/1960.

69. This probably applied to urban populations as well. For a comparison between the two, more research needs to be undertaken for urban Greece.

70. On the decline in homicide rates in Europe beginning in the late seventeenth century, a finding that confirms the framework of the civilizing process proposed by Norbert Elias, see Manuel Eisner, "Modernization, Self-Control and Lethal Violence: The Long-term Dynamics of European Homicide Rates in Theoretical Perspective," *British Journal of Criminology* 41, no 4 (2001): 618–638, https://doi.org/10.1093/bjc/41.4.618. For variations of this general trend in Greece, see Thomas Gallant, "Murder in a Mediterranean City: Homicide Trends in Athens, 1850–1936," *Journal of the Hellenic Diaspora* 23, no 2 (1997): 7–28.

71. Maybe these practices started to fail only later in time, probably after 1974 with the collapse of the dictatorship and the open political and social quest in Greece for "Europeanization."