

SCARS OF THE SOUL: GET REFUSAL AND SPIRITUAL ABUSE IN ORTHODOX JEWISH COMMUNITIES

Keshet Starr

Get refusal is a situation in which one member of a divorcing couple refuses to cooperate in the issuing of a *get*, a bill of Jewish divorce, leaving their former partner unable, under Jewish law, to remarry—or even, in the case of the wife, to form a new relationship. While there has been increasing recognition in the Jewish community that *get* refusal often represents a form of domestic abuse, there has been little discussion of how to categorize this particular type of abusive behavior. In this article, I argue that *get* refusal, in many cases, may be viewed as a form of spiritual abuse, in which faith is turned into a weapon of power and control in an abusive relationship. I will examine the way *get* refusal mirrors other forms of spiritual abuse by impacting a victim’s sense of self, place in the world and community. Finally, I will outline the importance of discussing *get* refusal and other forms of faith-related divorce-denial through the lens of spiritual abuse, in order to build understanding with clergy, mental health and social services practitioners, and religious communities.

When Hannah Goldberg¹ first met her husband, Daniel, he was friendly and charming. After a whirlwind courtship, they married and welcomed a son together. However, Daniel became increasingly critical of Hannah, and over time his behavior escalated into physical violence. When their son turned five, Hannah made the difficult decision to leave her marriage. The civil divorce process dragged out over several years, as the couple’s son became the epicenter of a vicious custody battle. Finally, four years after she left her abusive husband, Hannah was a “free” woman under American law. However, she still did not have her Jewish divorce, or *get*, which would allow her to remarry under the laws of her Orthodox Jewish community. Hannah endured countless meetings with rabbis and religious courts and tried numerous times to offer Daniel money and other concessions in exchange for a *get*, to no avail. Hannah remained an *agunah*,² a woman chained to a dead marriage, unable to move forward with her life.

Today, over twenty years after the fateful day when Hannah gathered her courage and most precious possessions and left her marriage, she is still waiting for a *get*.

The issue of *get* refusal—one spouse’s denial of a Jewish divorce to the other, leaving the latter trapped in a dead marriage—has garnered significant media attention in recent years, both within and outside the Orthodox Jewish community. There has been debate over exactly what type of problem *get* refusal represents: Is it a religious issue? A social justice cause? Something else entirely? This article will define *get* refusal as a form of domestic abuse and, in particular, a manifestation of spiritual abuse. I will argue that it is critically important to define *get* refusal as a form of spiritual abuse, rather than emotional or psychological abuse, because of the extensive damage it inflicts on the *agunah*’s sense of self, world and community. I will illustrate these claims by examining research on *get* refusal and its parallels to other forms of spiritual abuse in the Orthodox Jewish community, drawing insights as well from my own work as an advocate against *get* refusal. As I will discuss further below, the question of how to define *get* refusal goes far deeper than semantics, for it is only when we have the framework and language to discuss an issue that we have any possibility of addressing it.

Why It Matters

Looking at *get* refusal through the lens of domestic abuse, and specifically of spiritual abuse, provides an important context for understanding it, one with enormous practical implications. First, identifying *get* refusal as (often) a form of spiritual abuse affects community perceptions of recalcitrant husbands and *get* refusal cases. Orthodox Jewish communities sometimes lag in understanding that non-physical battering can still constitute domestic abuse and so do not always recognize the abusive dynamics at play.³ Without realizing that *get* refusal constitutes domestic abuse, communities, rabbis and a recalcitrant husband’s friends and family can more easily excuse and justify his behavior. Ultimately, if we seek to convince communities to *act* differently, then we must *teach* differently by explaining the coercive and abusive nature of *get* refusal. Labeling this behavior as abuse is a fundamental step toward changing community attitudes. I offer this article as a vehicle for educating faith communities on the spiritual damage of *get* refusal, in the hope of encouraging them to take a strong stand against this abusive behavior.

Second, identifying *get* refusal as a form of abuse may have legal implications. Putting *get* refusal into the category of domestic abuse provides a context that the legal world can access, rather than dismissing it as an esoteric religious issue completely separate from the courts. The Australian Supreme Court recently made headlines by explicitly labeling *get* refusal as a form of domestic abuse.⁴ In my own advocacy work, I have seen efforts to establish legislation along these lines in the United States. Beyond landmark court rulings, if all of the players in the matrimonial legal world—judges, attorneys, activists, etc.—were able to see *get* refusal for

the abusive behavior it is, I believe instances of *get* refusal would start to decrease dramatically.

Third, the definition of *get* refusal as spiritual abuse is extremely valuable to *agunot* themselves. Having language to describe one's experience is important to feeling validated, and this can assist a victim's recovery from her traumatic experience. Nicole Deshan and Zipi Levi describe their experience leading a support group for Orthodox battered women in Israel:

At this point, the abuse coordinator presented the concept of spiritual abuse to the *haredi* [ultra-Orthodox] group of abused women. The women found it very enlightening and helpful. They felt relief as, for the first time, their experiences were grasped and verbalized.⁵

Finally, while *get* refusal is an issue that only appears in the Jewish community, identifying *get* refusal as a form of spiritual abuse can have powerful relevance for victims of domestic abuse in other faith communities. Spiritual abuse occurs across religious groups, and many denominations within Christianity, Islam and other faiths also raise potential obstacles to the divorce process. Understanding spiritual abuse in the context of *agunah* cases in Orthodox Jewish communities paves the way for further discussions about abuse and end-of-marriage issues in other faiths as well.⁶

Background on Spiritual Abuse

The study of spiritual abuse is a fairly new discipline, appearing in academic literature since the early to mid-1990s. The term was first coined to refer to abusive religious communities rather than to marital and family dynamics. Thus, scholars studying spiritual abuse—defined as “the misuse of a position of power, leadership, or influence to further the selfish interests of someone other than the individual who needs help”⁷—focused on cult-like religious leaders or churches and on spiritual leaders who abused their positions. In a post designed to alert parishioners to warning signs of spiritual abuse in their churches, the blog “No Longer Quivering” advises congregants to look for: “(1) control-oriented styles of leadership; (2) spiritual elitism; (3) manipulation of members; (4) perceived persecution; (5) lifestyle rigidity; (6) suppression of dissent; (7) harsh discipline of members; (8) denunciation of other churches; (9) painful exit process.”⁸ The primary theme that emerges in discussions of spiritual abuse in a church context is that of power and control: Spiritual abusers use their religious institutions as a means to control their parishioners, echoing the basic nature of abuse as a quest for control.

The depictions of the church pastor-cum-spiritual-abuser using religion as a tool to manipulate and control his congregants struck a chord with advocates against domestic abuse, who observed the same dynamic in abusive marriages. In the 1990s, domestic abuse activists began using a circular chart dubbed the “Power and Control Wheel”

to demonstrate the various “tools” that a domestic abuser may use in order to control his or her partner and to illustrate that abuse is more complex than “black and blue marks.” The “Power and Control Wheel” has also been adapted for use in individual cultural groups. While the contents of each chart may vary, most of them reference eight basic categories of domestic abuse: (1) physical abuse; (2) emotional or psychological abuse; (3) sexual abuse; (4) economic abuse; (5) verbal abuse; (6) threats and explosions of anger; (7) social isolation; and (8) “using the superiority of men,” also known as “male privilege.”⁹ As these charts convey, batterers may employ multiple “tools” on the wheel to control their partners. Whether they threaten a beating or force their spouse to abide by a punishing budget, the effect is to create a culture of “intimate terrorism”¹⁰ in the home.

The message of the “Power and Control Wheel” may seem basic, but it is quite powerful in that it significantly expands the definition of what is considered domestic abuse. In the United States and internationally, spousal abuse is predominantly associated with physical battering, while other forms of domestic abuse are often not labeled as such.¹¹ However, many versions of the Power and Control Wheel miss a very important form of domestic abuse: spiritual abuse, which, though it can occur in any culture, is particularly common in religious communities.

Much as an abusive pastor uses his religious leadership as an opportunity to control, the abusive spouse may use religion as one of the many tools available to him to control his spouse. Comparing the literature on spiritual abuse at large with studies of spousal abuse highlights the many characteristics shared by abusive pastors and abusive husbands. Both are often outwardly charismatic and place a heavy emphasis on their personal authority to cover their own insecurities.¹² As Jeannie Cochrane writes, “abusive leaders tend to set themselves up as an ultimate authority,” while in abusive marriages, batterers will tell their spouses that they are in charge of the religious life of the home. Abusive pastors and partners also both engage in scriptural abuse by manipulating biblical and other canonical texts to reinforce their points of view.¹³

In his book on spousal abuse in the Jewish community—one of the first to be written from an ultra-Orthodox perspective—R. Abraham Twerski cites the personal story of a formerly abused Jewish wife. Because this woman was not Orthodox and her husband was, the husband used his greater religious knowledge to set himself up as the authority in their home:

What I did not realize then was that by setting himself up as more religious, David became the authority for religious practices, which of course I had to follow, and only he knew what was permissible and what wasn't. Again, I couldn't see at the time that this was one of his ways of trying to control me.¹⁴

As advocates against domestic abuse have discovered that there are many tools an abuser can use in order to control his or her spouse, there has been a growing interest in the role of religion and spirituality in spousal abuse. In the words of Alison Cares and Gretchen Cusick, “a victim's membership in a faith community or religious subculture

is another aspect perpetrators can use in their efforts to control.¹⁵ Spiritual abuse within the context of an abusive marriage has been broadly defined as “any attempt to impair the woman’s spiritual life, spiritual self, or spiritual well-being.” According to Deshan and Levi, this results in “a lowered spiritual self-image, guilt feelings, and/or disruption of transcendental connectedness.”¹⁶ For victims of domestic abuse living in religious communities, faith plays a particularly vital role in their experience and can heighten the impact of spiritual abuse.¹⁷ In this manner, domestic abuse becomes a “violation of spiritual integrity.”¹⁸

As scholarship on spiritual abuse has grown, debates have emerged as to whether spiritual abuse is to be seen as a form of emotional-psychological abuse or as a separate category of abuse. I share the view of Deshan and Levi, who argue that spiritual abuse must be seen as a separate category, because it has a fundamentally different impact on the victim than other forms of abuse.¹⁹ Spiritual abuse goes beyond attacking a person’s emotions to tear down fundamental notions of identity, of how the world operates and of community. For religious individuals, faith is a cornerstone of their systems of meaning—the constructs through which people understand the world and their place in it.²⁰ Having those core systems of meaning attacked through spiritual abuse is destructive on multiple levels, which cannot fully be visualized using the lens of psychological abuse alone. As Deshan and Levi write, the damage of spiritual abuse “does not occur at the interpersonal level, but rather at the transcendental one.”²¹ The abuse leaves scars not only on the mind, but on the soul.

In addition, distinguishing spiritual abuse from psychological abuse is a helpful framework for non-religious mental health and social service practitioners, who may otherwise be more likely to miss the religious nuances in a situation. As Tricia Bent-Goodley and Dawnvise Fowler argue, if social workers look at spiritual abuse as a form of emotional abuse, that narrow view will limit their true understanding of the situation.²² Separately analyzing spiritual abuse also better fits the holistic model of providing care to domestic abuse victims by taking their cultural context into account. Finally, having a term like spiritual abuse to describe their situation is extremely helpful to victims, since it provides them with language to describe their uniquely challenging experience. Spiritual abuse occurs across religious faiths, and the more education there is on the topic, the more domestic abuse advocates and counselors will be able to tailor their programs to the ways in which spiritual abuse manifests itself in different contexts, so as to provide culturally sensitive care. For instance, a Christian woman may be accused of failing to be a “Titus 2 wife,” that is, a model of a faithful, obedient Christian woman who has “done the work of raising her . . . family and honoring her husband,”²³ while a Jewish woman may be accused of destroying *shalom bayis*, the peace in her home.²⁴ The terms may be different, but the underlying framework is similar.

Spiritual Abuse in the Orthodox Jewish Community

Until the late 1980s, the generally accepted belief in the Jewish community was that domestic abuse scarcely existed in Jewish families. The stereotype of Jewish men was that they were “calm, quiet and mentally healthy,” not to mention “caring, kind and considerate.”²⁵ However, the Talmud itself contains prohibitions against various forms of domestic abuse, implying that it has in fact been an issue in Jewish communities for centuries. Maimonides goes further and prohibits sexual abuse within marriage, noting that a husband “is not to have intercourse while drunk, nor in the midst of a quarrel; he is not to do so out of hate, nor may he take her by force with her in fear of him” (Laws of Personal Status, 15:19). Jewish law sources also prohibit other forms of psychological abuse.²⁶ Furthermore, it is increasingly clear that domestic abuse affects *all* communities, though it can manifest differently in different social contexts.²⁷

Many members of Orthodox Jewish communities persist in maintaining long-held beliefs in the scarcity of domestic abuse among Jews, and to the extent that they do recognize that it exists in their midst, they are typically much more open to recognizing physical abuse than other forms of domestic abuse.²⁸ Twerski notes how he himself had to overcome this prejudice: “This book has been quite difficult for me to write, perhaps because I had to overcome my resistance to acknowledging that the problem of spousal abuse does indeed exist among Jews.”²⁹

Domestic abuse, along with divorce in general, is highly stigmatized in the Orthodox Jewish community. With such limited awareness, many victims are unable to identify what they are experiencing.³⁰ Orthodoxy has the lowest divorce rate of any denomination of Judaism, and, because of the stigma, which attaches to their children as well, troubled families are less likely to seek help. Women will often elect to remain in abusive marriages longer in order to ensure that their children are able to find suitable marriage partners. For instance, Twerski tells the story of a woman he counseled who had a seven-year-old daughter and was determined to stay in her marriage until her daughter was nineteen and able to enter the “marriage market.” This gives abusive husbands added power, because they know their wives will be extremely reluctant to leave the relationship. One victim of domestic abuse described the stigma connected to “any public sign of non-normalcy” in Orthodox families, highlighting the social estrangement that divorcees can experience.³¹

Otherwise treasured cultural values may be bent to figure in the stories of spiritual abuse in the Orthodox community. One such value is that of *shalom bayis*, literally “peace in the home”—in this context, the notion that family harmony must be preserved at all costs. While it is meant to apply to all family members, *shalom bayis* is often viewed as the responsibility of wives. It is a particularly challenging issue in the context of *get* refusal, since recalcitrant spouses may receive cultural support on the assumption that they are acting to preserve their family’s wholeness, while women choosing to leave abusive situations may be reproached by their communities and encouraged to reconcile.³² Another applicable concept is that of *hilul Hashem*, the desecration of God’s name: Publicizing domestic abuse in the Orthodox community

makes it “look bad” to the wider world. In this environment, Orthodox victims of domestic abuse face steep obstacles in their efforts to free themselves.

In Orthodox Jewish communities, spirituality is an integral part of everyday life and thus often plays a central role in domestic abuse. Within this context, as Cares and Cusick put it, “a client’s Jewish identity provides an additional set of ‘tools’ for her partner to use as part of a pattern of abuse.”³³ Cares and Cusick found that 70% of the women in their study of Jewish victims of domestic abuse felt that the abuse they suffered was intimately connected to their Judaism. Below, I will discuss in further detail how spiritual abuse can manifest in the Orthodox Jewish community and also examine how *get* refusal closely parallels other forms of spiritual abuse.

Get Refusal as a Form of Spiritual Abuse

Get Refusal in the Jewish World

In Jewish law, a marriage is contracted between two parties rather than being instituted by a third party, such as a rabbi or the state. Thus, in order to divorce, the couple must mutually agree to end the marriage through the husband’s giving and the wife’s receiving a writ of Jewish divorce, known as a *get*. A woman who has not received a *get* is still considered married to her husband, even if they are civilly divorced. Because the husband must give it and do so willingly, a religious court cannot issue the *get* without his participation. The consequences in Jewish law for remarrying without a *get* are severe, especially for the woman: She is considered to be in an adulterous relationship with her new spouse, and any children from her second union would be considered *mamzerim*, illegitimate, and hence unable to marry within the Jewish faith.³⁴

Jewish law does generally require a husband to provide a *get* after the couple has been separated;³⁵ however, because of the stipulation of his free consent, obtaining the compliance of a recalcitrant husband is difficult. This situation plays out somewhat differently in the Diaspora, where a religiously contracted marriage is subject to both civil and religious law, and in Israel, where the state subjects marriage and personal status to religious law. In Israel, a Jewish woman who is separated from her spouse but has not obtained a *get* is unable to remarry under the law of the state, irrespective of whether she is religiously observant, and her children by any other man are considered *mamzerim*. As an agency of the state,³⁶ the rabbinate has the power to impose sanctions upon an obstinate husband, which can include freezing his bank account, revoking his driver’s license or even incarcerating him. However, those sanctions are infrequently applied in practice, leaving the divorce process a “complicated and dangerous” one for battered women, with the *get* playing a significant role.³⁷ In her study of Israeli victims of domestic abuse, Madelaine Adelman notes that many women, despite varying levels of religious observance, indicated that having a child with the *mamzer* status would be extremely distressing to them, their families and their communities,³⁸ above and beyond the legal and social problems this status can pose for Israelis and those seeking to emigrate to Israel.³⁹

In the United States, religious law is not the marker for personal civil status, but women who want to remarry within the Orthodox community must still contend with the challenges of *get* refusal; a woman can be civilly free while still religiously chained to her failed marriage. Not only that, but her husband can potentially remarry in a civil ceremony while still refusing to grant his previous wife a religious divorce;⁴⁰ and the religious courts lack the civil enforcement power to ensure that the husband complies with this demand. Thus, both Israeli and American *agunot* struggle in different ways to gain their freedom. The plight of the *agunah* is a hotly discussed issue in Judaism, described, for example, by Rabbi Avi Weiss as “the most pressing problem in America’s Orthodox community.”⁴¹

While it is difficult to calculate exactly how many *agunot* exist today, studies have estimated that there are thousands in Israel and at least several hundred in North America.⁴² Part of the difficulty in ascertaining numbers of *agunot* is the disagreement over which cases qualify as *agunah* situations and at what point they obtain this status.⁴³ For instance, according to data released in February 2017 by the Israeli rabbinical courts, in the years 2012–2016 there were 382 cases of *agunot* in Israel and 427 cases of *agunim*—men who were unable to convince their wives to accept a *get*. However, these numbers were widely criticized, since, in the case of women, they counted only cases in which the rabbinical court had issued a ruling requiring the husband to provide a *get*, and such a ruling is very difficult for women to obtain, even after years of litigation.⁴⁴

In the absence of clear statistics, Ruth Halperin-Kaddari conducted a study of Israeli women going through divorce and found that *get* refusal was a much more widespread problem than the rabbinical courts had reported. Halperin-Kaddari found that concern about *get* abuse played a role in almost a third (28%) of the cases she examined. Furthermore, she found that almost one third of the cases ended with settlements that deviated from the law to the wife’s detriment, indicating the effect the *get* can have on the results of divorce proceedings. In the ultra-Orthodox community, nearly every second woman indicated that she capitulated to extortion in order to obtain her *get*. 19% of the women polled stated that the “most negatively influential pressure factor in the divorce process” was the *get*—more than custody issues, finances and more. This percentage rose to 25% for ultra-Orthodox respondents.⁴⁵

In the United States, Barbara Zakheim polled Jewish organizations that work on *agunah*-related issues and calculated that there were around 462 *agunot* in 2011, although, as in Israel, the true numbers of those affected by *get* refusal are likely much higher. In my experience working on *agunah* issues, *get* refusal leads to extortion, threats and controlling behavior in many divorce cases, regardless of whether or not there are rabbinic documents to officially qualify them as *agunah* situations. In that vein, Zakheim reports that in many of the *agunah* cases she looked at, the women gave in and made concessions in order to obtain a *get*. Of the women she studied, only 46% received child support for their children, and over 70% did not receive any spousal support at all.⁴⁶ Halperin-Kaddari also postulates that a significant number of cases in the Orthodox community in the U.S. have ended in divorce settlements that deviated

from the law to the detriment of the wife, an estimate echoed by my own experience.⁴⁷ Thus, while determining accurate numbers of *agunot* is nearly impossible, examining ancillary issues, such as the ways in which divorce settlements are impacted by *get* pressures, indicates very clearly that a widespread problem of *get* abuse exists in Jewish divorces on a global scale.

Stories on *agunot* have appeared regularly in major publications, vividly capturing the public's interest. Gital Dodelson, a New Jersey woman who waited for a *get* for several years, became a public figure after writing about her experience of *get* refusal in the *New York Post*.⁴⁸ Other women have also gone public with their stories. In 2014, the *New York Times* ran a cover story on Meir Kin, a recalcitrant husband who remarried while refusing to issue an unconditional *get* to his former wife. When *get* refusal cases become public, one of the first questions asked is why Jewish law cannot be adjusted to eliminate *get* abuse. Some scholars, such as Blu Greenberg, maintaining that "when there's a rabbinic will, there's a halachic [Jewish legal] way," have argued in favor of creating an alternative divorce procedure in *agunah* cases, to allow the wife to be freed without the husband's participation.⁴⁹ However, more traditional voices argue that the law can only evolve with community consensus, at a gradual pace.⁵⁰

A modern-day *agunah* has limited tools at her disposal to remedy her situation. One drastic option some women have turned to is hiring rabbis to use physical force to "encourage" their spouses to give them a *get*. Recently, a group of rabbis in Brooklyn and New Jersey was arrested for kidnapping recalcitrant husbands and using violence to induce them to issue *gets*.⁵¹ However, beyond the obvious ethical issues involved, this can cause a woman to face steep criminal and civil penalties. Another widely used option is to use social pressure to convince Orthodox communities to ostracize the recalcitrant husband. Historically, this method was often effective, but the geographic and social mobility characteristic of today's global society presents it with challenges,⁵² and some communities, limited in their understanding of the abusive nature of *get* refusal, will rally in support of the recalcitrant husband.

In my current role as Director of Advocacy and Legal Strategy for the Organization for the Resolution of Agunot (ORA), a New York-based nonprofit organization that has professionalized the use of social pressure by coordinating grassroots activism, I have participated in coordinating community outreach and social media campaigns to publicize individual *agunah* cases.⁵³ Efforts at civil legislation have also been implemented in New York State, but with limited success.⁵⁴ Ultimately, however, an *agunah* is placed in a difficult position and may face an impossible choice: to leave her religion and be free to remarry, or to stay within her faith and remain alone, perhaps indefinitely: "To embrace freedom is to lose her Jewish identity, her way of life, but to hold onto Orthodox Judaism is to forego later love."⁵⁵ In my work with hundreds of contested *get* cases, I have seen firsthand the painful limbo in which *agunot* find themselves.

In feedback from various presentations I have given on the issue of *get* refusal, many audience members ask why *agunot* in the United States do not "just leave" their religious communities and date in the secular world. For many reasons, this suggestion

is both overly simplistic and culturally insensitive. For an Orthodox Jewish woman, leaving her religious community would mean leaving behind her family, friends, professional network and, in many cases, a large part of her identity. These comments also point to a wider issue in the public perception of domestic abuse: the blaming of victims for not “just leaving.” Between safety concerns and custody lawsuits, leaving an abuser is generally a prolonged and difficult course, strewn with obstacles. Focusing on why women stay shifts the focus from the batterer to the victim. As Martha Mahoney puts it, “the image of exit hides oppression behind a mask of choice.”⁵⁶ For most *agunot*, leaving their communities is not a viable option, let alone an optimal one. After all, “women have a right to their own culture, and not to be a victim of it.”⁵⁷ Demands that they exit their religious communities provide neither solace nor a solution.

The *get* is a powerful tool that Orthodox Jewish abusers can use to spiritually batter their victims. As Rachel Levmore, an *agunah* activist in Israel, has remarked, “the ultimate component of the control issue in Jewish marriages is *get* refusal.”⁵⁸ In their work with Orthodox victims of domestic abuse, Cares and Cusick found that the men used their power over the *get* as a way of exploiting Judaism to control their wives. 69% of the Orthodox participants were extremely concerned about the *get*.⁵⁹ In my own experience, I have seen many husbands attempt to use the *get* as a way of keeping their wives in the marriage, threatening them that if they leave, they will never receive a *get*, so there is no point in trying. For these women, the *get* is not just a religious ceremony, but a “lingering way for their estranged partners to harass them.”⁶⁰

This behavior echoes much of the literature on the challenges of leaving abusive marriages. It is well documented that initiating divorce can put a domestic abuse victim in great physical danger. “Separation assault” refers to the behavior of a batterer seeking to regain control of his or her partner by punishing her for leaving the relationship. These attempts at reestablishing control can continue throughout and after the divorce process, in what Adelman calls “divorce-related domestic violence.”⁶¹ Mahoney adds, “We know that abusers still seek power and control, even if the victim has left the relationship.”⁶² Divorce-related domestic abuse can take many forms, from vicious custody battles to post-divorce financial control. As Mahoney remarks, the ability to withhold a *get* provides abusive husbands with the ability to control their spouse, even if they lack other forms of social power. If they are Jewish, *get* refusal, says Adelman, offers “a readily available, religiously and legally [in Israel] instituted technique of power that batterers may employ to terrorize their wives.”⁶³

Get Refusal and an *Agunah*'s Sense of Self

Like other forms of spiritual abuse, *get* refusal has a profound impact on an *agunah*'s sense of self. As Jeannie Cochrane writes, “spiritual abuse is the kind of abuse which damages the central core of who we are.”⁶⁴ For a religious individual, faith is a core aspect of self-identity, and thus an attack through faith is essentially an attack on the self. The various labels of self-definition that a religious woman may use—“I am a daughter of the King,” “I am a child of God,” etc.—are lost when her core sense of

spiritual identity is in question. Jewish women, in particular, may base their self-worth on how well they fulfill the roles of a Jewish wife and mother. As Adelman comments, “for women whose identity is based on motherhood and the marital home, being divorced removes their primary way of being in the world”⁶⁵—the more so if she cannot remarry.

Deshan and Levi point to three primary categories of spiritual abuse within marriage, all of which contribute to a destruction of sense of self: belittling a spouse’s beliefs; preventing a spouse from performing religious acts; and forcing a spouse to transgress religious laws. As an example of the first category, Deshan and Levi describe a husband mocking his wife while she prayed, telling her that her prayers were worthless and so “preventing [her] from feeling spiritually satisfied through her act of praying. He damaged her spiritual experience, and he abused her spiritual self; that is, he spiritually abused her.”⁶⁶ Similarly, *get* refusal belittles a woman’s beliefs by challenging her view of Judaism as a faith of fairness and kindness. Even if her husband’s behavior is in violation of Jewish law, the strictures that allow him to withhold the *get* can make an *agunah* feel that her faith is acting against her. *Get* refusal twists a religious act into an abusive one, changing the nature of the religious experience itself. Seeking to break a partner’s sense of a relationship with the divine is a form of abuse.⁶⁷ *Get* refusal is a powerful means of accomplishing this goal.

As an example of the second category of spiritual abuse, preventing a spouse from performing spiritual acts, Deshan and Levi recall a husband who forbade his wife to purchase ingredients to make *halah*—the braided loaves traditionally eaten on the Sabbath—thus restraining and limiting her spiritual life. Another abusive husband deliberately did not keep his wife “in mind” when he recited blessings on the Sabbath, so that, according to Jewish law, his wife would not be fulfilling the blessing.⁶⁸ Other husbands refused to pay for important religious needs, such as synagogue membership or private Jewish schools, in keeping with the religious standards of their community.⁶⁹ Similarly, *get* refusal prevents a woman from carrying out acts of spirituality by keeping her separated from the traditional family structure that is central to Judaism’s spiritual and communal life. She is left in limbo, unsure of how to define herself.

The third category of spiritual abuse involves a batterer forcing his partner to violate her religious beliefs. As Deshan and Levi note, any deviation from Jewish law is “spiritually perturbing” to an observant individual.⁷⁰ The stories of Orthodox victims of domestic abuse resound with examples of women being forced to transgress important elements of Jewish law. For instance, one husband refused to pay for kosher food, forcing his wife to eat non-kosher food instead.⁷¹ In my own work with Orthodox Jewish victims of domestic abuse, I have heard many stories of women being forced to engage in sexual relations during the *nidah* period—the period of menstrual impurity during which any physical contact between husband and wife is strictly forbidden. Scholars and professionals who work with Orthodox battered women echo these stories as well.⁷² Being raped during the *nidah* period often has a profoundly destructive impact on a woman’s sense of self. Not only must she carry the trauma of the violation, but she may also struggle with feelings of unworthiness and distance from her faith

for having “committed” a severely prohibited act, albeit unwillingly. As Lisa Twerski, a therapist working on issues of family violence in the Orthodox community, notes:

In this case, even though the woman was coerced into this she feels tainted by the enormity of the *aveirah* [sin], and she may be unable to differentiate his responsibility from her own. This leaves her feeling guilty, emotionally depleted and unworthy.⁷³

Such stories highlight the cycle of blame in spiritual abuse: Forced by the abuser to transgress, the victim is filled with shame and self-blame, leaving her even more vulnerable to her partner’s abuse and control. In cases of *get* refusal, *agunot* may feel that they must choose between remaining committed to Jewish law and engaging in religiously illicit relationships. An *agunah* may feel distant from her faith because of her situation, and this, in turn, may make her feel unworthy and unholy.

A final category of spiritual abuse, less explicitly discussed in the literature on spiritual abuse within marriage, is that of manipulating religious beliefs. One woman described how her husband would quote esoteric rabbinic sources to bolster his claims, knowing that she did not have sufficient religious knowledge to respond. Another woman’s husband refused to allow her to take a taxi to the hospital when she went into labor on the Sabbath, even though Jewish law is universally interpreted to permit this. As we have seen, abusive husbands often employ religious concepts such as *shalom bayis* and *hilul Hashem* to intimidate their spouses into staying in the marriage and blame them for marital problems.⁷⁴ In cases of *get* refusal, recalcitrant husbands often tell their spouses that they are acting in full accordance with Jewish law and look for fringe rabbinical figures to justify their points of view. Much of the rhetoric of abusive husbands and their supporters consists of gross manipulation of Jewish legal concepts.

The indeterminate status *agunot* experience also highlights the complexities of faith that can impact an *agunah*’s sense of herself and the world. Religion is often blamed for negatively affecting victims of domestic abuse, but it can also be a source of healing and support. In their work with victims of domestic abuse in African-American Protestant communities, Bent-Goodley and Fowler found that for many of the women they spoke to, faith provided “an enormous strength, coping mechanism and source of comfort” beyond what any trained counselor could provide.⁷⁵ While *agunot* may feel angry and disillusioned with the elements of Jewish law that keep them bound, they may still remain passionately connected to Judaism and desire to focus on their faith throughout their struggle. Dena Saadat Hassouneh-Phillips, who works with victims of abuse in the Muslim community, quotes a woman who expressed similar sentiments about Islam:

[I stayed in my marriage because] I was taught that to be a good Muslim, I had to submit to my husband. And although it did not make sense to me, I stayed because I rationalized, “Okay, 97% of Islam is good, so I can deal with the other 3%.”⁷⁶

That individuals may simultaneously be suffering on account of some tenets of their faith while still feeling connected to it highlights the complexity of faith and the importance of appropriately identifying spiritual abuse. By offering a more nuanced understanding of spiritual abuse, professionals in the field can “help women empower themselves, heal, and find inner solutions for peace.”⁷⁷ To combat the damage caused by *get* refusal to an *agunah*’s sense of self, it is critical for her to be able to understand what she is experiencing and to maintain a resilient self-image. Understanding the deep impact of *get* refusal is also a critical first step in garnering grassroots community support for *agunot*.

Get Refusal and Understanding the World

According to David Pelcovitz, “at the core of our internal world, we hold basic views of ourselves and our external world that represent our orientation” to the world.⁷⁸ Ronnie Janoff-Bulman argues that most individuals hold three primary core assumptions: that the world is benevolent; that it is meaningful; and that the self is worthy. The first assumption—that people are basically good and the world is generally a safe place—may seem naïve in a world riddled with problems. Nevertheless, most individuals distinguish between themselves and the rest of the world and see *their* world as safe and the events in *their* lives as mostly good. In making the second assumption—that ultimately good things happen to good people and bad things happen to bad people—we seek to assert control and tell ourselves that if we *are* good, we should *get* good. A belief in a divine Creator may also figure prominently in this core assumption; as Janoff-Bulman says, a “belief in a God who rewards a moral existence also reflects belief in a meaningful world.” Following the third assumption, most people view themselves in a positive light and believe that they are good people operating in a good world. These core assumptions develop in infancy, and their often illusory nature does not make them any less critical to psychological well-being. In fact, says Janoff-Bulman, “the key to a good life might well be illusions at our deepest, more generalized level of assumptions.”⁷⁹ These assumptions can connect strongly to religious belief as well. Spiritual worldviews “influence the way people understand and interpret their life experiences” and the meanings they ascribe to challenges in life.⁸⁰

A traumatic experience severely threatens these core assumptions. For instance, a rape victim is suddenly made all too aware that the world is not always benevolent, that events are not clearly meaningful, and that bad things can happen to good people—like her. When trauma shatters the assumptions that form our basic systems of meaning, says Janoff-Bulman, “an intense psychological crisis is induced.” This shattering of core assumptions and systems is perhaps the greatest violation of a traumatic victimization: A trauma victim is not only injured physically; she also suffers a terrible injury to her inner world. A traumatic experience requires a person to deviate from the “script” of her life and create a new set of assumptions. As Janoff-Bulman writes, “The very nature of the world and self seems to have changed; neither can be trusted, neither guarantees security.” The critical element here is the loss of trust in both the

world *and* the self. Trauma's damage is both internal and external: Externally, the world becomes more threatening, and internally, it creates "chaos."⁸¹

Survivors of trauma who have had their core assumptions challenged generally experience a heightened awareness of vulnerability. They are tragically aware that bad things can indeed happen to them and those they love. Victims may also exhibit a strong fear of abandonment. Battered women, in particular, have to deal not only with the trauma of the abuse they suffered, but also with the sometimes crippling fear of being left on their own to manage their lives with insufficient resources.⁸² Trauma victims also experience states of high reactivity and hyper-arousal, because they see threats everywhere. Many of these symptoms are very evident in the stories of *agunot*, who deal with high levels of anxiety in their everyday lives and struggle to rebuild their trust in the world.

Certain aspects of *get* refusal make it particularly damaging to a victim's sense of the world and her place in it. According to Janoff-Bulman, "acts of man," as opposed to "acts of nature," are particularly destructive to a person's ability to believe in a benevolent world. The knowledge that one has been deliberately targeted for harm by another person profoundly shatters the victim's sense of a good world and of her own self-worth.⁸³ As Tameka Gillum, Cris Sullivan and Deborah Bybee point out, "the experience of being hurt by someone one believes should love, cherish and protect one causes a great deal of spiritual distress."⁸⁴ *Agunot* have to live with the knowledge that their pain is the result of the "conscious, malicious intention of another human being."⁸⁵ This can make them feel powerless, which is precisely the goal of domestic abuse. Moreover, an *agunah* experiences not just a single act of harm, but an ongoing, daily assault on her freedom and dignity. According to the "psychiatric vulnerability model," an individual is more likely to suffer acutely and for a longer duration after a repeated traumatic event. A new trauma can be particularly devastating if the victim has not had time and space to recover from a previous one.⁸⁶ For the average *agunah*, being denied a *get* is a trauma that arrives concurrently with or immediately after the trauma of an abusive relationship. The Orthodox battered woman has little if any time to recover from her traumatic marriage before she is faced with perhaps her greatest battle—for her spiritual freedom. In my work, I have seen how the loss and disillusionment that *agunot* experience strike at the very core of their being.

Thus, an *agunah* lives with many psychological wounds. She may display typical reactions to trauma, such as alternating between numbness and reliving the trauma and experiencing denial and self-blame. In his study of the psychological profiles of *agunot*, Pelcovitz found that the women he interviewed experienced high levels of anxiety, denial and ongoing post-traumatic stress disorder (PTSD); difficulty in trusting people, particularly those in authority; a loss of friendships and social withdrawal; low self-esteem; and feelings of shame, depression, anger and resentment. 55% of the women in Pelcovitz's study indicated that they had difficulty calming down when they were upset, which is consistent with findings in larger studies of interpersonal trauma victims. 20% reported suicidal ideation, demonstrating the depth of their distress. Ultimately, Pelcovitz concluded that the *agunot* in his study were suffering



Q. What does the *ketubah* have in common with a *matzevah*?

A. The mothers' names are omitted.

Helene Aylon, *My Marriage Contract* (2009). Mixed media. Courtesy of Helene Aylon.

from ongoing PTSD, with all of the attendant possibilities for negative consequences in social, emotional and other realms.⁸⁷ In my work as an advocate for *agunot*, I have seen firsthand the fear, disillusionment and loss of trust in themselves and others that *agunot* experience. They speak frequently of being caught in limbo, unsure of who or what to believe, where they fit in and what is going to happen to them.

Investigating the role of systems of meaning in the traumatic experiences of the women he interviewed, Pelcovitz found that 75% of the *agunot* in the sample reported varying degrees of changes in their beliefs.⁸⁸ Cares and Cusick, too, noted that some of the battered women in their study experienced a significant crisis of faith as a result of the abuse they suffered.⁸⁹ *Agunot* face the additional distress of having to choose between remaining in their religious communities, in limbo, and gaining their freedom but losing their friends, families and core systems of meaning. As Lisa Rosenberg asks, “are we not really asking them, if they are observant and want to remain so, to divorce themselves from their very identities?”⁹⁰

In the world of trauma recovery, many scholars discuss the search for meaning that can result from traumatic experiences, as people seek to understand their pain in the context of a larger purpose. Holocaust survivor Victor Frankl coined the term “logotherapy,” or “meaning therapy,” to represent the notion that a person can choose how to react to his or her circumstances and find meaning even in trauma.⁹¹ Many religious faiths emphasize the redemptive role of suffering. However, this can be a particularly challenging issue for *agunot*, because their context for finding meaning—their Jewish faith—has become a weapon used against them in the warfare of spiritual abuse. As Janoff-Bulman writes, some traumas are simply “more difficult to reinterpret as positive, meaningful, or reflective of self-worth than others.”⁹²

An *agunah* knows that the person causing her enormous pain is someone she once loved, lived with and may have had children with. Loss of trust in a spouse can lead to a larger breakdown in trust in the world, according to Janoff-Bulman, as “foundations of social harmony are fractured.”⁹³ Being caught in the liminal status of an *agunah* can make a woman feel that the axis of her world has shifted irreparably. It is crucial for her to have the language to understand what she is walking through and relate it back to her community. By affirming that “it is not the spirituality of the woman but the ways in which spirituality can be used as a tool for oppression”⁹⁴ that matters, communities and divorce professionals can assist *agunot* in surviving their ordeal and rebuilding their lives.

Get Refusal and the Role of Communities

As we have seen, communities play a role, sometimes for better but often for worse, in the experience of *get* refusal. The associated trauma may be enhanced by community encouragement and support of an abusive husband. In addition, by turning faith itself into a weapon, spiritual abuse renders its victims unlikely to turn to their religious communities for support. Thus, an abuser not only further isolates his partner but also disconnects her from the faith community that might otherwise provide her with a powerful support system and a path to freedom.

Be it their struggles to navigate the labyrinth-like world of the *beit din* (religious court) system, their attempts to gather community support, or their disappointments with responses from the local rabbinate, many *agunot* experience intense disillusionment with the Orthodox community. In Rosenberg's study of *agunot*, many of the women she interviewed saw their rabbis and community institutions as "either explicitly against them, indifferent to their pain, or sympathetic, but unwilling to intervene."⁹⁵ In my own professional interactions with *agunot*, women consistently articulate the alienation they feel at times from their rabbis and communities, which ideally should be a source of support.

Rabbis often play a pivotal role in the experiences of Orthodox women dealing with domestic abuse and *get* refusal issues, but not always a positive one. In Cares and Cusick's study of battered women within various denominations of Judaism, rabbis played a positive role in 11 out of 21 cases.⁹⁶ In those situations, the rabbis made referrals, attended religious court sessions with the women, counseled them and were generally available for support. One woman described how her rabbi validated her sense that the abuse she suffered had made her marriage like a prison. However, rabbis, many of them in the Orthodox community, also played negative roles. In one case, the rabbi called the wife to demand that she drop the charges after the husband was arrested for domestic abuse. Another woman described her pain when her former community rabbi allowed her husband to remarry even though he had not given her a *get*.⁹⁷ Educating rabbis on the spiritually abusive nature of *get* refusal can play a vital role in ensuring that *agunot* who reach out to them receive support and understanding.

Beyond the roles of rabbis themselves, some *agunot* view the Orthodox communities they live in as "mostly uncaring,"⁹⁸ creating yet another layer of injury to their systems of meaning. Negative responses by outside observers can exacerbate a victim's trauma and reinforce the idea that the world is not a trustworthy place.⁹⁹ For a religious person, the undermining of their belief in the community and its leadership as models of holiness and goodness goes to the heart of their core assumptive values. "Spiritual abuse has a devastating effect on people," observes David Henke. "A very high level of trust is often placed in spiritual leaders. It is expected that the trust will be honored and guarded. When such trust is violated the wound is very deep." Losing faith in one's spiritual leaders can make it difficult for a victim of spiritual abuse to trust even God himself.¹⁰⁰ Cares and Cusick found that while some victims of domestic abuse felt that their Jewish communities were a source of strength to them, others felt extremely disconnected and consequently "struggled with their spirituality."¹⁰¹ Compared to other trauma victims, *agunot* have a particularly difficult time in this regard because their status—not single, not married—places them outside of the social fabric.¹⁰² In addition, *agunot*, like all trauma victims, embody the fact that bad things can happen to good people. In the Jewish context, they are a physical manifestation not only of domestic abuse, but of an aspect of Jewish law that many communities wish to ignore. They are living representations that Judaism is not always "shiny" or untainted.

Educating communities about spiritual abuse and, in particular, about *get* refusal is a critical step in ensuring that *agunot* and other abuse victims receive backing from their

faith communities. In their study, Gillum, Sullivan and Bybee found that a supportive religious community was a key factor in abuse victims' ability to rebuild their lives, and that, for many of them, "unconditional love and acceptance from their supreme being (i.e., God) and the desire for a loving religious family" were crucial. The study also found that involvement in a religious community did help abuse victims rebuild their lives and gain comfort and strength.¹⁰³ Similarly, *agunot* should be able to avail themselves of communal support as they proceed through their already isolating ordeal. In Bent-Goodley and Fowler's study of victims of domestic abuse, participants felt that their communities did not educate parishioners on spiritual abuse because community members did not fully understand it. Educating communities on spiritual abuse is a powerful means of avoiding further pain for victims.¹⁰⁴ In the Jewish context, the more communities are aware of the abusive elements of *get* refusal, the less likely they will be to condone the behavior of abusive husbands in their midst.

The Impact of Get Refusal and Spiritual Abuse Research on Other Faiths

Defining *get* refusal as a form of spiritual abuse not only helps *agunot* make sense of their experiences and provides a context for communities to understand them; it is also useful for understanding parallel forms of spiritual abuse in other faiths. Thus, scholars studying domestic abuse in the Fundamental Protestant Christian (FPC) community discuss the lack of culturally appropriate resources for domestic abuse victims in the faith.¹⁰⁵ Just as *agunot* may have been encouraged to remain in abusive situations to preserve *shalom bayis*, abused FPC women may be told to preserve "the harmony in the home."¹⁰⁶ Certain cultural concepts, such as the importance of a wife's "submissiveness," can become very dangerous in an abusive situation. Abusive husbands may also manipulate religious principles to convince their wives that they are "defective" like the biblical Eve, who committed the Original Sin. The strict gender roles in the FPC community also deeply impact spiritual abuse. If abused FPC women do choose to leave, they may not receive support from their spiritual communities. This lack of social support can make it very difficult for abused women to leave their relationships, making them vulnerable to divorce-related domestic violence.¹⁰⁷

Scholars studying spiritual abuse in Muslim communities have found similar instances of religious principles turned into weapons of abuse. Hassouneh-Phillips provides several examples, such as a husband who reneged on terms of the religious marriage contract, citing varying religious interpretations, and one who told his wife that the requirements of Islamic "wifely obedience" required her to wake up and serve him food at 2:00 in the morning. While Islamic law allows for several forms of divorce, the *talaq* form is issued unilaterally by the husband. Both Adelman and Pascale Fournier discuss the challenges of divorce denial in the Muslim world. As an Israeli Muslim attorney told Adelman, "If the husband does not agree, there is no divorce. Even if there is a [valid] reason, if he does not agree, there is no divorce."¹⁰⁸ Fournier adds that Muslim women are sometimes extorted to give up their dowry (the

mahr) in exchange for a divorce,¹⁰⁹ a phenomenon very similar to the extortion many *agunot* must contend with in the divorce process.

In the Muslim world, too, divorce-related domestic abuse may impact the victim's spiritual identity. Hassouneh-Phillips discusses the saying "marriage is half of faith, and the rest is fear [of] Allah." If marriage itself is an act of faith, and a husband is also a partner in faith, this can make it extremely difficult for abused women to see a future for themselves outside of marriage. As is often the case in the Orthodox Jewish community, unmarried women may feel like they are in limbo, without a role and unable to find their place in their community.¹¹⁰ Just as social norms can keep women in abusive marriages, they also heighten the impact of spiritual abuse. As Fournier remarks, "issues of personal status are of critical importance for Muslim women, because they often remain the last bastion of male dominance."¹¹¹ Much like the abuse of the *get*, Christian and Muslim communities' faith can be manipulated into a tool of abuse in marriage and divorce, keeping women tethered to relationships through the ties of faith, community and identity.

An *agunah* faces perhaps the greatest trial of her life. She knows that each day her abuser is choosing to keep her captive. And yet, when she reaches for the tools to pick up the pieces of her life, she finds that everything has been rearranged, and that what she thought about who she is and the world she inhabits has changed. Even the divine Creator she has always learned about now feels distant. In the words of one *agunah*, "if you have scars in your soul, it's worse, believe me, it's worse. It's hard to heal."¹¹² It is critical to recognize the spiritual abuse that is part and parcel of many cases of *get* refusal and, in doing so, to give *agunot* and their communities the education and tools they need to combat that abuse. Adopting this lens and this language in discussing *get* refusal may help motivate true change and healing, in our courts, in our houses of worship, in our faith communities and, most potently, within ourselves.

Keshet Starr is Director of Advocacy and Legal Strategy at the Organization for the Resolution of Agunot (ORA). At ORA, she coordinates grassroots activism and provides guidance and support to individuals navigating the Jewish divorce process. ORA advocates for the elimination of abuse in the Jewish divorce process and seeks to prevent future cases by promoting the Halakhic Prenuptial Agreement. Starr is a graduate of the University of Michigan, Ann Arbor, and holds a J.D. from the University of Pennsylvania Law School. She lives in New Jersey with her husband and two young children. Keshet.starr@gmail.com

Notes:

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1. Not her real name.

2. Both men and women can become victims of *get* refusal, the wife if her former husband refuses to grant her a *get*, and the husband if his former wife refuses to accept it. In this article, I use the feminine term *agunot* for women victims and refer to their spouses as “recalcitrant husbands.” The term *agunah* comes from the Hebrew word ‘ogen, anchor. See David Curwin, “Agunah and Ogen,” www.balashon.com/2009/05/aguna-and-ogen.html (accessed November 13, 2015); and Lisa Rosenberg, “Determination/Despair: Agunot Speak About their Chains,” *Canadian Woman Studies*, 16/4 (1996), p. 69.
3. Simona Steinmetz and Muhammad M. Haj-Yahia, “Definitions of and Beliefs about Wife Abuse among Ultra-Orthodox Jewish Men from Israel,” *Journal of Interpersonal Violence*, 21/4 (2006), p. 536.
4. In the case that occasioned this ruling, the husband, refusing to comply with a summons from the Melbourne rabbinical court, demanded money in exchange for a *get*. The wife then went to civil court to request an extension of her “intervention order” (the Australian equivalent of an Order of Protection) on account of her husband’s abusive recalcitrance. The Magistrate hearing the case “broke new ground when she accepted a legal argument that withholding a *get* constituted unlawful . . . abuse.” Peter Kohn, “Court Ruling Eases Jewish Divorce,” *Australian Jewish News*, www.jewishnews.net.au/court-ruling-eases-jewish-divorce/40897 (accessed November 13, 2015).
5. Nicole Deshan and Zipi Levi, “Spiritual Abuse: An Additional Dimension of Abuse Experienced by Abused Haredi (Ultraorthodox) Jewish Wives,” *Violence against Women*, 15 (2009), p. 1300.
6. There are many studies discussing the parallels between Jewish and Islamic divorce law and religious arbitration in divorce-related issues. Examples include Clare Chambers, *Sex, Culture and Justice: the Limits of Choice* (University Park, PA: Pennsylvania State University Press, 2008); and Pascale Fournier, “Calculating Claims: Jewish and Muslim Women Navigating Religion, Economics and Law in Canada,” *International Journal of Law in Context*, 8/1 (2012), pp. 47–72.
7. David Henke, “Spiritual Abuse,” www.watchman.org/profiles/pdf/spiritualabuseprofile.pdf, p. 1 (accessed November 11, 2015); see also Jeannie Cochrane, “Spiritual Abuse,” *Spiritual Growth Ministries*, http://www.sgm.org.nz/uploads/2/0/1/6/20165561/spiritual_abuse.pdf, p. 1 (accessed December 8, 2016).
8. Suzanne Calulu, “What Is a Cult? Church of Wells Edition,” www.patheos.com/blogs/nolongerquivering/2014/04/not-quoting-quiverfull-what-is-a-cult-church-of-wells-edition/ (accessed November 11, 2015), referencing Robert M. Enroth, *Churches that Abuse* (Grand Rapids: Zondervan, 1992), at www.reveal.org/development/Churches_that_Abuse.pdf (accessed December 8, 2016).
9. Deshan and Levi, “Spiritual Abuse” (above, note 5), p. 1299.
10. Alison C. Cares and Gretchen R. Cusick, “Risks and Opportunities of Faith and Culture: The Case of an Abused Jewish Woman,” *Journal of Family Violence*, 27 (2012), p. 433.
11. Steinmetz and Haj-Yahia, “Wife Abuse” (above, note 3), p. 529.
12. While men can also be victims of domestic abuse, for the sake of brevity I will use this terminology. See A. Holtzworth-Munroe and N. Smultzer, “Comparing the Emotional Reactions and Behavioral Intentions of Violent and Nonviolent Husbands to Aggressive, Distressed, and Other Wife Behaviors,” *Violence and Victims*, 11/4 (1996), p. 9.
13. Cochrane, “Spiritual Abuse” (above, note 7), pp. 2–3.
14. Abraham J. Twerski, *The Shame Borne in Silence: Spouse Abuse in the Jewish Community* (Pittsburgh: Mirkov Publications, 1996), p. 100.

15. Cares and Cusick, "Risks and Opportunities" (above, note 10), p. 427.
16. Deshan and Levi, "Spiritual Abuse" (above, note 5), pp. 1300–1303.
17. Tricia B. Bent-Goodley and Dawnovise N. Fowler, "Spiritual and Religious Abuse: Expanding What is Known about Domestic Violence," *Affilia: Journal of Women and Social Work*, 21/3 (2006), p. 282.
18. T.M. Eugene, "Swing Low, Sweet Chariot: A Womanist Response to Sexual Violence and Abuse," in C.J. Adams & M.M. Fortune (eds.), *Violence against Women and Children: A Christian Theological Sourcebook* (New York: Continuum, 1995), pp. 185–200.
19. Deshan and Levi, "Spiritual Abuse" (above, note 5), p. 1295.
20. David Pelcovitz, "Running Head: The Psychological Correlates of Being an 'Aguna'" (unpublished manuscript, used with permission).
21. Deshan and Levi, "Spiritual Abuse" (above, note 5), p. 1302.
22. Bent-Goodley and Fowler, "Spiritual and Religious Abuse" (above, note 17), p. 289.
23. Rochelle Fleming, "Titus 2 Women: Reverent Behavior," Light-Work, <http://lightwork.typepad.com/lightwork/files/Reverent.pdf> (accessed April 21, 2016); Katie, "Portrait of a Titus 2 Woman," <http://youngwifesguide.com/portrait-of-a-titus-2-woman/> (last modified July 5, 2013; accessed November 12, 2015).
24. "Marital Harmony," www.chabad.org/library/article_cdo/aid/477632/jewish/Marital-Harmony.html (accessed November 11, 2015).
25. Steinmetz and Haj-Yahia, "Wife Abuse" (above, note 3), p. 529; Twerski, *Shame Borne in Silence* (above, note 14), p. 31.
26. Steinmetz and Haj-Yahia, "Wife Abuse" (above, note 3), p. 527.
27. Bent-Goodley and Fowler, "Spiritual and Religious Abuse" (above, note 17), p. 282.
28. Cares and Cusick, "Risks and Opportunities" (above, note 10), p. 428; Steinmetz and Haj-Yahia, "Wife Abuse" (above, note 3), p. 536.
29. Twerski, *Shame Borne in Silence* (above, note 14), p. 1.
30. Jay Sweifach and Heidi Heft-LaPorte, "A Model for Group Work Practice with Ultra-Orthodox Jewish Victims of Domestic Violence: A Qualitative Study," *Social Work with Groups*, 30/3 (2008), p. 33.
31. Jay Brodbar-Nemzer, "Divorce in the Jewish Community: The Impact of Jewish Commitment," *Journal of Jewish Communal Service*, 61/2 (1984), p. 152.
32. Madelaine Adelman, "No Way Out: Divorce-Related Domestic Violence in Israel," *Violence against Women*, 6/11 (2000), pp. 1223–1243; Cares and Cusick, "Risks and Opportunities" (above, note 10), p. 428.
33. Cares and Cusick, "Risks and Opportunities" (above, note 10), p. 433.
34. Akiva Miller, "The Policing of Religious Marriage Prohibitions in Israel: Religion, State and Information Technology," *The John Marshall Journal of Information Technology & Privacy Law*, 31/1 (2014), pp. 26–29.
35. According to Maimonides, a wife "is not like a captive woman who is required to submit to intercourse with someone who is hateful to her," and she is therefore entitled to a divorce if she no longer wishes to remain married to her husband (Laws of Personal Status, 14:8).
36. Miller, "Policing of Religious Marriage" (above, note 34), p. 24.
37. Adelman, "No Way Out" (above, note 32), pp. 1236–1239.
38. *Ibid.*, p. 1247.
39. Miller, "Policing of Religious Marriage" (above, note 34), p. 36; according to Miller, the list of those barred from marriage contained close to 5,500 names in November 2012.

40. Sharon Shenhav, "Human Rights, Jewish Women, and Jewish Law," *Justice*, 21 (1999), p. 29; Ann Harris, "Human Rights, Jewish Women, and Jewish Law," *ibid.*, p. 32.
41. Renee Ghert-Zand, "The Face of *Agunot* Promises to Keep Fighting for All Chained Women," *Times of Israel*, November 15, 2013, www.timesofisrael.com/the-face-of-agunot-promises-to-keep-fighting-for-all-chained-women/ (accessed February 23, 2017).
42. Ruth Halperin-Kaddari, "*Agunot* in Israel: A Study," lecture delivered at the JOFA Agunah Summit, Tikva Center at NYU Law School, New York, June 24, 2013, https://jofa.org/sites/default/files/uploaded_files/agunot_in_israel_-_presentation1.pdf (accessed February 4, 2017); Barbara Zakheim, "Results from a Study of *Agunot*" (Mellman Group, 2011).
43. Rachel Levmore, "The '*Agunah*'—A Statistic or a Real Problem?" *Jerusalem Post*, www.jpost.com/Opinion/Op-Ed-Contributors/The-aguna-a-statistic-or-a-real-problem (accessed March 15, 2016).
44. See, e.g., Jeremy Sharon, "Rabbinical Court Statistics on '*Agunot*' Being Disputed," *Jerusalem Post*, February 14, 2017, <http://www.jpost.com/Israel-News/Rabbinical-court-statistics-on-agunot-being-disputed-481557> (accessed February 23, 2017); Halperin-Kaddari, "*Agunot* in Israel" (above, note 42).
45. Halperin-Kaddari, "*Agunot* in Israel" (above, note 42).
46. Zakheim, in "Study of *Agunot*" (above, note 42), also found that the average *agunah* was a young woman with around two children, leaving her first marriage.
47. Halperin-Kaddari, "*Agunot* in Israel" (above, note 42).
48. Ghert-Zand, "The Face of *Agunot*" (above, note 41).
49. Alice Shalvi and Shulamit Peck, "Blu Greenberg," Jewish Women's Archive, <http://jwa.org/encyclopedia/article/greenberg-blu> (accessed November 13, 2015).
50. Twerski, *Shame Borne in Silence* (above, note 14), p. 124.
51. Amber Sutherland and Josh Saul, "Jewish Mom Desperate for Divorce Breaks Down on the Stand," *New York Post*, January 23, 2015, nypost.com/2015/01/23/jewish-mom-desperate-for-divorce-breaks-down-on-stand/; Jennifer Medina, "Unwilling to Allow His Wife a Divorce, He Marries Another," *New York Times*, March 21, 2014, www.nytimes.com/2014/03/22/us/a-wedding-amid-cries-of-unfinished-business-from-a-marriage.html?_r=0; David Shortell, "Orthodox Rabbis Convicted of Conspiracy in New Jersey Kidnap-Divorce Plot," CNN, April 22, 2015, www.cnn.com/2015/04/22/us/jewish-rabbis-convicted/ (all accessed November 13, 2015).
52. "The modern problem of a woman becoming an *agunah* because of a recalcitrant husband's refusal to give a get was not a serious one in the days when the Jewish community was close and interdependent, where rabbinical orders were obeyed, and when social pressures were adequate to convince the husband to give a get." Twerski, *Shame Borne in Silence* (above, note 14), p. 12.
53. "Recalcitrant Husbands," ORA website, www.getora.org/#!recalcitrant-husbands/c243a (accessed November 13, 2015).
54. Alexandra Leichter, "The Effect of Jewish Divorce Law on Family Law Litigation," International Academy of Family Lawyers, www.iafl.com/cms_media/files/the_effect_of_jewish_divorce_law_on_family_law_litigation.pdf?static=1, p. 8 (accessed November 29, 2016). While a discussion of New York's two pieces of *get* legislation is beyond the scope of this article, I have found them to be of limited use in my work.
55. Rosenberg, "Determination and Despair" (above, note 2), p. 72.
56. Martha R. Mahoney, "Exit: Power and the Idea of Leaving in Love, Work and the Confirmation Hearings," *University of Southern California Law Review*, 65 (1991/2), p. 1283;

- Andrea J. Martin, Kathy R. Berenson, Sascha Griffing et al., "The Process of Leaving an Abusive Relationship: The Role of Risk Assessments and Decision-Certainty," *Journal of Family Violence*, 15/2 (2000), p. 110.
57. Halperin-Kaddari, "Agunot in Israel" (above, note 42).
 58. Levmore, "The 'Agunah'" (above, note 43).
 59. Cares and Cusick, "Risks and Opportunities" (above, note 10), pp. 428–434.
 60. *Ibid.*, p. 431. Tameka L. Gillum, Cris M. Sullivan and Deborah I. Bybee echo this concept, adding that many of the women they studied experienced "feelings of despair, belief that life is meaningless" and a perception of themselves as powerless; eidem, "The Importance of Spirituality in the Lives of Domestic Violence Survivors," *Violence Against Women*, 12/3 (2006), p. 240.
 61. Adelman, "No Way Out" (above, note 32), pp. 1224–1230.
 62. Mahoney, "Exit" (above, note 57), p. 1304.
 63. Adelman, "No Way Out" (above, note 32), p. 1247.
 64. Cochrane, "Spiritual Abuse" (above, note 7), p. 5.
 65. Adelman, "No Way Out" (above, note 32), p. 1249.
 66. Deshan and Levi, "Spiritual Abuse" (above, note 5), p. 1301.
 67. Bent-Goodley and Fowler, "Spiritual and Religious Abuse" (above, note 17), p. 288.
 68. Deshan and Levi, "Spiritual Abuse" (above, note 5), p. 1301.
 69. Cares and Cusick, "Risks and Opportunities" (above, note 10), p. 431.
 70. Deshan and Levi, "Spiritual Abuse" (above, note 5), p. 1300.
 71. Cares and Cusick, "Risks and Opportunities" (above, note 10), p. 431.
 72. Among them are Lisa Twerski, Alison Cares and Nicole Deshan; see Lisa Twerski, *I'm So Confused, Am I Being Abused? Guidance for the Orthodox Jewish Spouse and Those Who Want to Help* (Israel: Israel Bookshop Publications, 2011), p. 48. On the rules of menstrual impurity see Nishmat, "Introduction to the Laws of Niddah," www.jewishwomenshealth.org/article.php?article=12 (accessed November 13, 2015).
 73. Twerski, *I'm So Confused* (above, note 76), *loc. cit.*
 74. *Ibid.*; Anat Zuria (director), *Mekudeshet: Sentenced to Marriage* (Amithos Films, 2004); Cares and Cusick, "Risks and Opportunities" (above, note 10), p. 428.
 75. Bent-Goodley and Fowler, "Spiritual and Religious Abuse" (above, note 17), p. 293.
 76. Dena Saadat Hassouneh-Phillips, "Marriage is Half of Faith and the Rest is Fear of Allah: Marriage and Spousal Abuse among American Muslims," *Violence against Women*, 7/8 (2001), p. 940.
 77. Bent-Goodley and Fowler, "Spiritual and Religious Abuse" (above, note 17), p. 293.
 78. Pelcovitz, "Running Head" (above, note 20).
 79. Ronnie Janoff-Bulman, *Shattered Assumptions: Towards a New Psychology of Trauma* (New York: Free Press, 1992), pp. 12–14.
 80. Larry Ortiz, Sue Villereal and Margaret Engel, "Culture and Spirituality: A Review of Literature," *Social Thought* 19/4 (2000), pp. 19–36.
 81. Janoff-Bulman, *Shattered Assumptions* (above, note 83), p. 65.
 82. *Ibid.*, pp. 59–61.
 83. *Ibid.*, p. 77.
 84. Gillum et al., "Importance of Spirituality" (above, note 61), p. 241.
 85. Janoff-Bulman, *Shattered Assumptions* (above, note 83), p. 79; her argument here is based on the work of Morton Bard and Dawn Sangrey.
 86. *Ibid.*

87. Pelcovitz, "Running Head" (above, note 20), p. 5; Janoff-Bulman, *Shattered Assumptions* (above, note 83), pp. 95–128.
88. Pelcovitz, "Running Head" (above, note 20), p. 5.
89. Cares and Cusick, "Risks and Opportunities" (above, note 10), p. 433.
90. Rosenberg, "Determination/Despair" (above, note 2), p. 73.
91. Victor Frankl, *Man's Search for Meaning: An Introduction to Logotherapy* (New York: Washington Square Press, 1963), pp. 105–107.
92. Janoff-Bulman, *Shattered Assumptions* (above, note 83), p. 140.
93. *Ibid.*, p. 79.
94. Bent-Goodley and Fowler, "Spiritual and Religious Abuse" (above, note 17), p. 290.
95. Rosenberg, "Determination/Despair" (above, note 2), p. 70.
96. Cares and Cusick, "Risks and Opportunities" (above, note 10), p. 433.
97. In rare situations, Jewish law allows a husband to obtain a *heter me'ah rabanim* ("permission of a hundred rabbis") permitting him to marry a second wife if his first wife is unable or unwilling to receive a get. While this Jewish legal mechanism is meant only for extreme circumstances, some rabbis have used it fraudulently to allow husbands who are refusing a get to remarry. See Yair Hoffman, "The *Heter Meah Rabbonim*: An Overview," www.theyeshivaworld.com/news/headlines-breaking-stories/223910/the-heter-meah-rabbonim-an-overview.html (accessed November 13, 2015).
98. Rosenberg, "Determination/Despair" (above, note 2), p. 70.
99. Janoff-Bulman, *Shattered Assumptions* (above, note 83), p. 79.
100. Henke, "Spiritual Abuse" (above, note 7), p. 1.
101. Cares and Cusick, "Risks and Opportunities" (above, note 11), p. 433.
102. In Pelcovitz's study, 65% of *agunot* reported feeling "very different, or set apart from other people." Pelcovitz, "Running Head" (above, note 20), p. 8.
103. Gillum et al., "Importance of Spirituality" (above, note 61), pp. 240–245.
104. Bent-Goodley and Fowler, "Spiritual and Religious Abuse" (above, note 17), pp. 282–291. The authors note that in the African American community they studied, domestic abuse victims turned to faith resources first, before pursuing health, social or legal services.
105. Louisa L. Foss and Melanie A. Warnke, "Fundamentalist Protestant Christian Women: Recognizing Cultural and Gender Influences on Domestic Violence," *Counseling and Values*, 48/1 (October 2003), p. 14.
106. A.P. Matthews, "How Evangelical Women Cope with Prescription and Description," in C.C. Kroeger and J.R. Beck (eds.), *Women, Abuse, and the Bible: How Scripture Can Be Used to Hurt or to Heal* (Grand Rapids, MI: Baker Books, 1996), pp. 86–105.
107. *Ibid.*, p. 86; Gillum et al., "Importance of Spirituality" (above, note 61), p. 240; Foss and Warnke, "Fundamentalist Protestant Christian Women" (above, note 110), pp. 19–20.
108. Hassouneh-Phillips, "Marriage is Half of Faith" (above, note 80), pp. 937–939; Pascale Fournier, "The Reception of Muslim Family Laws in Western Liberal States," *Dossier*, 27 (2005), pp. 72–74; Adelman, "No Way Out" (above, note 32), pp. 1240–1248.
109. Fournier, "Reception of Muslim Family Laws" (above, note 113), p. 74.
110. Hassouneh-Phillips, "Marriage is Half of Faith" (above, note 80), pp. 931–934.
111. Fournier, "Reception of Muslim Family Laws" (above, note 113), p. 65.
112. Rosenberg, "Determination/Despair" (above, note 2), p. 69.