### TESTIMONY BEFORE THE OHIO SENATE JUDICIARY COMMITTEE IN SUPPORT OF S.B. 214

Kristine M. Severyn, Ph.D., R.Ph. March 20, 2018, Ohio Statehouse, North Hearing Room

Chairman Bacon and members of the Committee: Thank you for the opportunity to address you today about Ohio Senate Bill 214, which would prohibit the dangerous cultural, non-medical practice of Female Genital Mutilation (FGM), also known as female circumcision or "cutting." I am also grateful to the sponsors of S.B. 214, Senators Terhar and Lehner, for their advocacy of women and girls who have been maimed by the procedure, and to prevent future injuries to vulnerable young women.

I live near Dayton, Ohio in Senator Lehner's district, and am a registered pharmacist with a Ph.D. in biopharmaceutics, specializing in pharmacology, toxicology, and drug kinetics. As a health-care professional, I have extensively researched the FGM issue, and submitted a letter to The Wall Street Journal, published September 1, 2017 about the FGM issue in Columbus, Ohio. (See pages 15-16, below.)

Here in our state capital, Columbus, which is home to the country's second largest Somali immigrant population of about 50,000 (second only to Minneapolis, Minnesota), virtually all Somali-born women, and likely many of their daughters, have undergone some form of FGM.

In an effort to achieve "cooperation, understanding, mutual respect, and harmony" with Columbus's Somali immigrants, the Ohio Department of Public Safety published "A Guide to Somali Culture" for first responders and law enforcement. The Guide devotes more than four pages to the Somali/Muslim cultural/religious practice of FGM (1).

What is FGM? FGM is the ritual cutting and alteration of the female genitalia performed in some African and other cultures for the purpose of ensuring virginity until marriage and eliminating sexual pleasure for women. Girls between the ages of 4 and 10 years are the most common age group for FGM, which is performed by a non-medical local village practitioner or midwife who, for a fee and without anesthesia, uses knives, razor blades, broken glass, or scissors to cut and maim the female genitalia. The girl's arms are forcibly restrained by other women and her legs are held apart during the procedure. Following the procedure the girls are often bound with ropes from waste to toes to facilitate healing of the bleeding wounds.

Dangers of FGM include severe bleeding, hemorrhagic shock, nerve damage, severe infection and septicemia (blood infections), potential abscess formation, cysts, excessive growth of scar tissue, urinary tract infections, painful sexual intercourse, increased susceptibility to HIV/AIDS, reproductive tract infection, pelvic inflammatory diseases, infertility, painful menstruation, chronic urinary tract obstruction (bladder stones), urinary incontinence, obstructed labor, and increased risk of bleeding and infection during childbirth. Some FGM victims must be cut again before marriage to facilitate sexual intercourse and childbirth. FGM harms girls and women for life.

The World Health Organization classifies FGM into four major types, three of which are illustrated on page 4 of this testimony.

- Type 1: Partial or total removal of the clitoris or prepuce surrounding the clitoris.
- Type 2: Partial or total removal of the clitoris and outer lips of the vagina (labia minora and/or labia minora).
- Type 3: Narrowing the vaginal opening by cutting and repositioning the inner and/or outer labia with or without removal of the clitoris.
- Type 4: Includes any other harmful procedures, e.g., pricking, piercing, incising, scraping, and cauterizing (burning), the female genital area.

Western countries banning FGM include Australia, Canada, Norway, Sweden, and the United Kingdom. While U.S. federal law banned FGM in 1996, only 26 states specifically outlaw the procedure, making local prosecution difficult. (See U.S. map on page 5 below.)

Ohio does not statutorily forbid FGM, which S.B. 214 would correct. Pennsylvania is currently debating legislation to ban FGM (see page 6 below). Two Detroit, Michigan area physicians have been prosecuted in federal court for performing FGM on girls whose parents travelled from Minneapolis to Detroit to secure FGM for their daughters (see page 8 below). Finding difficulty in locating FGM "practitioners" in this country, some families resort to "vacation cutting," by sending their daughters back to Somalia to visit family, where the girls undergo FGM.

Modern medicine recognizes the dangers of FGM. Medical organizations opposing FGM as unnecessary and potentially harmful include the World Health Organization, International Federation of Gynecology and Obstetrics, American College of Obstetricians and Gynecologists, College of Physicians and Surgeons of Ontario, Canada, American Academy of Pediatrics, and the American Medical Association.

Ob-gyn staff at The Ohio State University reported on the special ob-gyn needs involved in delivering babies and/or FGM repair in Columbus, Ohio Somali women (2). A Somali woman, who personally underwent FGM as a youth, wrote her 2012 University of Toledo sociology master's thesis on reasons for FGM persistence in the Columbus, Ohio Somali community (3).

To gauge the extent of the FGM problem in Ohio, I submitted a public records request to the Ohio Department of Medicaid (ODM) for the total number of cases and dollar reimbursement to Ohio Medicaid providers, hospitals, and other health-care entities associated with FGM repair (ICD 9 Code 629.22 and ICE 10 Code N90.810) for the years the agency has data. ODM denied my public records request. A legislator in another state obtained such data from her state's Medicaid department. Perhaps if this committee made the same request, it might receive a more favorable response from ODM.

Ohio would do well to adopt SB 214 and prohibit Female Genital Mutilation, joining 26 other states and the federal government in protecting women and young girls from these barbaric practices. Thank you for your careful study of this issue. I am happy to answer any questions.

#### References

- 1. "A Guide to Somali Culture," Ohio Department of Public Safety, Division of Homeland Security, <a href="http://www.publicsafety.ohio.gov/links/HLS0075.pdf">http://www.publicsafety.ohio.gov/links/HLS0075.pdf</a>
- 2. Understanding barriers to reproductive health care among Somali women in Columbus, Ohio. <a href="https://cph.osu.edu/sites/default/files/facstaff/docs/Norris\_Somali%20womens%20health\_February2014\_2.pdf">https://cph.osu.edu/sites/default/files/facstaff/docs/Norris\_Somali%20womens%20health\_February2014\_2.pdf</a>
- 3. Abubakar, Nasra, "Female genital mutilation: why does it continue to be a social and cultural force?" (2012). <a href="http://utdr.utoledo.edu/theses-dissertations/251">http://utdr.utoledo.edu/theses-dissertations/251</a>

(Continued below)

#### **Types of Female Genital Mutilation**

(PEDIATRICS Volume 125, Number 5, May 2010, 1088-1093)

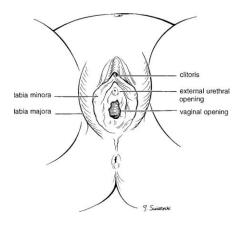


Figure 1: Normal female genitalia

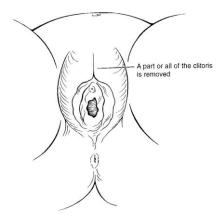


Figure 2: Type 1 female genital mutilation

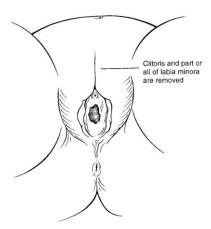


Figure 3: Type 2 female genital mutilation

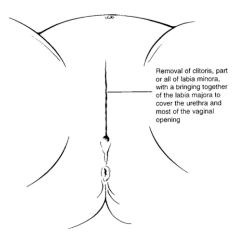


Figure 4: Type 3 female genital mutilation

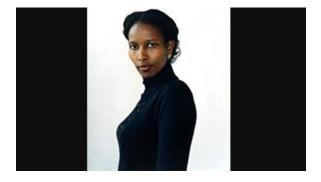
## States with Laws Criminalizing FGM



## Harsher punishments for female mutilation proposed in Harrisburg

State rep. re-introduces bill for harsher laws against female circumcision.

By
<a href="Sam Newhouse">Sam Newhouse</a>
Published: January 22, 2018



Ayaan Hirsi Ali, writer and critic of some Islamic cultural practices, expressed support for a new Pa. bill to stiffen penalties against female circumcision. (Provided)

A Democratic state representative on Monday called for support for a bill to officially outlaw female circumcision in Pennsylvania and to make such acts, called "female genital mutilation," a felony.

"Women who are immigrants are at continued risk of the practice as these cultural beliefs follow them to the United States. ... We cannot stop this unless my legislation is passed into law," PA. state rep. Tom Murt (D-Montgomery/Philadelphia) said Monday after announcing the reintroduction of this legislation, which he has been trying to pass since the 2013-14 session. "In 2008, the World Health Assembly passed a resolution about the elimination of this practice, emphasizing the need for concerted action from health care providers and law enforcement to stop this practice."

Female genital mutilation, referred to as FGM and consistent with what some cultures call female circumcision, in general, does not clearly fall within Pennsylvania's assault statutes, said a foundation that lobbies for legislation against FGM.

"General aggravated assault laws are not sufficient to protect against FGM," said George Zarubin, executive director of the AHA (Ayaan Hirsi Ali) Foundation in a statement in support

of Murt's bill. "Parents wrongly believe they are doing the best for their child by inflicting FGM on them. There is no malicious intent required to prosecute assault. Legislating against FGM in Pennsylvania would give prosecutors the ability to prosecute at the state level"

So far, 26 states have illegalized FGM, including Delaware, Maryland and New York.

Ali, founder of the AHA Foundation, was born in Somalia and as a resident of the UK is an outspoken critic of FGM along with honor killings and arranged marriages, all of which her foundation lobbies against. Ali has in the past been accused of Islamophobia for primarily targeting cultural practices common within the Muslim faith.

Female circumcision has been practiced on at least an estimated 130 million women worldwide.

FGM has rarely been documented in the U.S., but is estimated to happen as often as in 73 percent of cases in countries like Gambia, with Ethiopia having a 98 percent female circumcision rate, according to UNICEF. Brigham and Women's Hospital in Boston has an African Women's Health Center purely devoted to treating female circumcision, whose doctors say cases of FGM are rising in the US as immigrants bring their traditions to the country.

"Steeped in a strong cultural belief that views it as a rite of passage, FGC involves the removal of external genitalia in young girls when they are between the ages of five and 12," researchers <a href="from Brigham's wrote">from Brigham's wrote</a>. "Some of the risks associated with the procedure include disability and premature death."

The AHA Foundation said some 500,000 women in the US, 166,000 of them under 18, are at risk of FGM.

Pennsylvania is ranked 11th in the nation for FGM risk, with some 19,000 women estimated to be at risk of the procedure, 6,000 of them under the age of 18.

#### **FGM By the Numbers**

500,000 Women at risk of FGM in the US

166,000 Under 18

19,000 Women at risk of FGM in Pennsylvania

6,000 Under 18 http://mobile.wnd.com/2017/09/muslim-doctor-accused-of-mutilating-countless-little-girls-freed-on-4-5-million-bond/

#### **WND Exclusive**

# Muslim doctor accused of mutilating 'countless' little girls freed on \$4.5 million bond

Surprise decision comes after she was arrested at airport trying to flee U.S.

Published: 42 mins ago. Updated: 09/19/2017 at 8:16 PM





Female genital mutilation has become a Western problem due to mass migration from the Middle East and Africa.

After five months in jail, Dr. Jumana Nagarwala, the Detroit-area Muslim doctor accused of mutilating the genitalia of "countless" young girls, was released on a \$4.5 million unsecured property bond Tuesday.

"I was there in the courtroom. I saw it all," said Elizabeth Yore, an international child-welfare advocate and leader of the #EndFGMToday initiative.

Yore said Dr. Nagarwala, 44, appeared Tuesday before Judge Bernard Friedman in an orange jumpsuit, her head covered by a hijab or Muslim headscarf. She remained silent during the entire pretrial detention hearing.



Jumana Nagarwala, one of two Muslim physicians in the Detroit area accused of secretly performing FGM on girls ages 6 through 8.

By the end, the doctor flashed a brief smile when she was told by the judge she would be released from jail pending her trial, which will likely occur in 2018. She then wept, which her attorney called "tears of joy."

Until Tuesday, Nagarwala had been the only one of eight defendants in the nation's first FGM case being held without bond.

FGM has been banned by 25 states and a federal law against the procedure, called "female circumcision" in Middle Eastern cultures, has been in place since 1996. But the U.S. Department of Justice under Presidents Clinton, Bush and Obama failed to prosecute a single case under the federal law, even though the U.S. Centers for Disease Control estimates that upwards of 513,000 American girls and women have either had the practice done or are at risk of being mutilated by rogue doctors, nurses and midwives.

Yore said all those fighting to remove FGM from American society were disappointed with the judge's decision, because Nagarwala served as the "hub of a FGM network" that was abusing young girls and she also poses an extreme flight risk. Federal prosecutors had argued for no bond in her case.

"Dr. Nagarwala serves as the main defendant and the central hub of this particular FGM underground network," Yore said. "As such, she poses a danger to society and a grave flight risk.

"While the facts of this case will be horrifying for these little girls to relive, the shocking details that will emerge from Dr. Nagarwala's upcoming trial will raise awareness about the barbaric practice of FGM."

Nagarwala has been in prison since she was arrested in April at Detroit International Airport trying to board a flight to Kenya. That alone, along with her wealth and connections in India and Africa, makes her a flight risk.

But her lawyers agreed to multiple conditions to win her release after "friends and family" helped her pony up \$4.5 million in real estate in multiple states. At least \$2.5 million worth of assets were put up by the doctor herself.

She will remain in home detention until her trial, will have an ankle monitor and surrender her passport.

"The judge seemed to buy that but having had experience with international child abduction, and Muslim fathers trying to flee with their abducted American children and having heard judges say 'give me your passport' and yet off they go, I'm still skeptical," said Yore, who has represented hundreds of American women trying to get their children back from fathers who whisk them off to countries in the Middle East and Africa.

Nagarwala is charged with conspiracy, genital mutilation, transporting minors with intent to engage in criminal sexual activity, lying to FBI agents and obstructing an official proceeding. If convicted, she could face up to life in prison.

Nagarwala is one of eight defendants in the growing federal case, the first of its kind in the United States. The defendants now include two doctors, a doctor's wife and assistant, and two mothers who willingly turned their 7-year-old daughters over to Nagarwala to have their genitalia cut and removed. The genital parts were then allegedly given to the parents to be buried in a ritualistic ceremony practiced by the Dawoodi Bohra, a sect of Shia Islam based in western India. The sect operates 22 mosques across the United States.

Some critics have decried the "misleading" reports of Detroit newspapers, which have portrayed female genital mutilation as practiced by a single, isolated sect of Islam, the Dawoodi Bohra, despite evidence it is embedded within Shariah rules for living and widely practiced within the mainstream Sunni Muslim cultures of Egypt, Indonesia, Somalia, Sudan, Nigeria, Yemen, and other countries.

"When I look at this case, I see that even journalists writing about the situation are trying to paint this as a certain sect of Islam, and not a general Islamic problem, with no proof whatsoever of what they are saying," said Dr. Mark Christian, a physician and former Sunni Muslim who practiced gynecology in Egypt but later converted to Christianity and moved to America.



Girls in the U.S. are often told lies by their parents to lure them to a mutilator's clinic.

"Dr. Nagarwala and this group of Shia Muslims, all of them working together as a Muslim enclave in Detroit, appear to have operated a clinic that provides Shariah-compliant OB-GYN services, and the media and everyone is trying their best to paint this as if it is not a Muslim problem at large but just a single sect," Dr. Christian said. "This is a very sad situation where fear of offending Islam is overriding everything among those trying to abide by what's politically correct. I thought in America everyone had the right to voice their opinion and speak the full truth."

Christian said that if such a barbaric practice were occurring within a sect of Christianity the reaction from the media would be far different, and the defendant would likely not be offered bond of any amount.

"If this had happened in a church or any other religious group other than Islam, it would be Armageddon on that group, but because of the fear of Islam nobody can challenge it whatsoever," Dr. Christian said. "When you are dealing with the First Amendment, yes we have to respect that, but at the same time it's not a free hand to do whatever you want to harm any human being, and we should challenge Islam on those grounds.

"We should appreciate the freedom of religion and cleanse our society of any practice that harms human beings, especially young girls who haven't even reached puberty, denying them their identity and denying them heir womanhood."

All eight defendants are now lawyered up with their own separate attorneys.

Judge Friedman also forbade them from using the Internet, but granted exceptions for an upcoming period of holy days.

"They asked for a special exception to go on the Internet to watch sermons for a special holy day," Yore said. "The judge asked how long does the sermon take, and they said 10 days."

Friedman, a Reagan appointee, "bent over backwards" to accommodate, Yore said.

Based on previous statements from her attorney, Nagarwala's defense team appears to be ready to base its entire defense on her simply exercising her First Amendment right to freedom of religion.

"They say they should be able to do what they want with respect to their religion," Yore said. "Well, did we give a pass to David Koresh [of Branch Davidians], Jim Jones [of Jonestown] or Warren Jeffs [Mormon sect] to practice child abuse in the name of their region? No, we laughed at it, we scoffed at it, and we should be doing the same thing in this case."

#### Special rights for practicing Islam?

If the defense's argument continues to be religious freedom, it may appear as though Islam is looking for special rights not available to other religions in the United States.

"No one gets a free pass to abuse children in the name of religion, and that includes parents," Yore said. "These prosecutors, I'm pretty impressed with how tough they are, to prosecute parents that's pretty darn tough. I think they want to send a message that it's not just the doctor mutilators, it's the parents who are involved in this underground network who also are being put on notice."

Nagarwala has been practicing for at least 12 years.

"This is an underground network that has been hiding from the government for 12 years," Yore said. "It's a parallel society that has formed and, but for this case, nobody would believe this was going on in the United States."

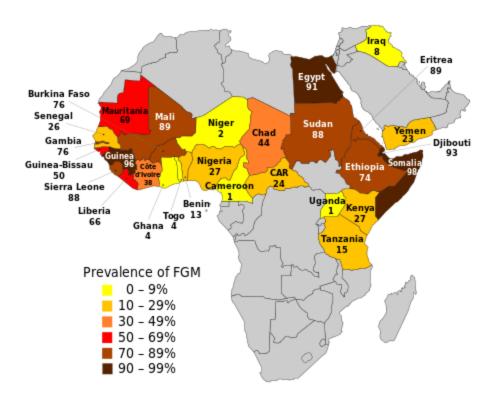
There are 22 Dawoodi Nohra mosques in the U.S. "And FGM is promoted and expected in these mosques. This is what they call 'purity for women," Yore said.

In Michigan, most members of the sect belong to the Anjuman-e-Najmi mosque in Farmington Hills.

"This case is growing big time, and largely because the Department of Justice is being very aggressive in identifying victims and going after the mutilators and charging them along with the parents.," Yore said.

"The question, one of the many, is what role did the mosque play in facilitating, aiding and abetting?" she added. "Were costs paid, what arrangements were made with Dr. Nagarwala?"

Federal prosecutors have estimated at least 100 girls have been mutilated by this one network in Michigan, and that parents from out of state brought their girls to Nagarwala and another male doctor from as far away as Chicago, New York, Minnesota and Los Angeles.



"This is like human trafficking, and unless we get victims to come forward, or start putting heat on these mosques, set up 24-hour hotlines and mandate reporting by social workers, it's not going to break the case open," Yore said.

She believes the government should "go right to the heart of it — the religious-freedom argument."

"In the United States we draw the line at children being abused," Yore said. "It doesn't matter if it's the Catholic Church, an obscure sect of Mormonism, or a mosque. The government is going to step in to protect children who have been abused. And we don't' care who the parents are, what their religion is or how much money they have. The state has to make the determination that a child's welfare supersedes all of that."

#### Half of the 50 states have no laws against FGM

Michigan has passed its own state law banning FGM in the wake of the arrests, which shocked residents of almost all backgrounds and faiths.

The states of Minnesota and Maine have also tried, unsuccessfully, to join the list of 25 states that have laws against FGM. State lawmakers, mostly Democrats, in those states have said they are against FGM but want to be "culturally sensitive" when trying to eliminate the practice.

"I have seen every type of child abuse and FGM is up there with the most cruel I have ever seen," Yore told WND. "This is hideous, and what do they do? They rationalize, the minimize, say it didn't happen or if it did it's just a little nick, or it's no different than male circumcision."

The procedures were benign and legal, defense lawyers have argued. Prosecutors say that's a lie.

"Their pants and underwear were removed ... and Dr. Nagarwala approached with a sharp tool to cut their genitals," assistant U.S. attorney Sara Woodward said during an earlier court hearing.

"We just have to attack each one of those lies, without fear of being called a hater or Islamophobe. If we don't draw the line at FGM are we going to draw it at child marriages? Honor killings? Where do we draw the line that children aren't going to be abused on the basis of religious freedom? If you want to live here you can't come and draw up rules for living based on ancient barbaric laws."

Yore gives kudos to Attorney General Jeff Sessions for his tenacity on this issue.

"The Bush administration didn't touch this, and we know the Obama administration wouldn't touch it. They closed their eyes to it."

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## Cutting Young Girls Isn't Religious Freedom

WORSHIP By Kristina Arriaga

year-old girl from Minnesota entered an examina-

tion room at a clinic just outwas a regular visit, she allowed the doctor to remove her pants and underwear and place her on the examination table. Suddenly, while two women in the clinic held her hands, the physician spread her legs and cut her clitoris. Two months later she told investigators the pain ran down to her ankles and she could barely walk

In April Dr. Jumana Nagarwala, who allegedly performed the procedure, was charged with conspiracy to commit female genital mutilation. Dr. Fakhruddin Attar, the owner of the since-closed clinic, was also charged. Investigators suspect Ms. Nagarwala may be involved in 100 other cases, and the trial starts in October. This marks the first time a female genital mutilation case is going to federal court The lawyers for the Michigan physician will argue the girl "underwent a benign religious procedure." This is a dangerous hypocrisy with farreaching consequence

genital mutilation has been illegal in the U.S. since 1996. Yet a 2012 study in the journal Public Health Reports estimates that more than 500,000 girls in the U.S. have undergone the procedure or

Earlier this over the country, with larger Commission on International Muslim organization called Dayear, a 7- concentrations in California, Religious Freedom, of which I water-Hadiyah. concentrations in California, New York and Minnesota. Most go through this process in secret, and only 25 states have laws that criminalize the procedure/In Maine, the American side of Detroit. Thinking this Civil Liberties Union has opposed a-bill to do so on the ground that "the risk of mutilation isn't worth expanding Maine's criminal code."

Female genital mutilation, most often performed on girls under 13, has serious medical and psychological repercussions. The cutting ranges from a clitoridectomy, partial to total removal of the clitoris, to infibulation, removal of all the external genitalia. The latter is so severe that "healing" often involves binding the girl from ankle to waist until the scar tissue closes. This kind of cutting leaves an opening the width of a pencil for urination, menstruation, sex and childbirth.

In 2015 a U.N. official esti mated that 20% of parents take their daughters to physilans but the rest use improvised sharp objects. This spring, an Ethiopian man in Georgia was deported for performing female genital mutilation with a pair of seissors on his 2-year-old daughter. Parents fearing prosecution sometimes take their girls out of the country for "vacation cutting." A report from Unicef suggests at least 200 million girls and women alive today, in 30 countries, have undergone

am vice chairwoman, does not take an official position on female genital mutilation.)

Whether this practice is religious or cultural is debatable: In the Michigan case, the victims belong to an Indian Shiite Muslim sect called the Dawoodi Bohra, whose members refer to the clitoris as a sinful lump of flesh. The cutting, khatna, is considered a religious observance to prevent girls from tion.

The First Amendment doesn't protect the barbaric act of female genital mutilation.

becoming promiscuous. Yet female genital mutilation predates Christianity and Islam. No religious text requires it. Many imams have issued fatwas against the practice and Christian leaders like Pope Francis have denounced it.

The physician's lawyers announced they will craft a religious-freedom defense. And they may be astute enough to get away with it. The all-star team includes constitutional law scholar and O.J. Simpson lawyer Alan Dershowitz, along with Mayer Morganroth, who represented assisted-suicide champion Dr. Jack Kevorkian for more than 15 years. The are at risk. These girls live all some form of it. (The U.S. are funded by an international

The lawyers must know they are entering dangerous territory, at least in terms of public relations. After coming under criticism for defending female genital mutilation, Mr. Dershowitz suggested during a June interview that pricking the girls' clitoris would be a better way to fulfill a "religious legal obligation. This is absurd. There is no such obliga-

The physician's lawyers have not only put these girls at even greater risk, they have tainted the religious freedom of all Americans with their specious arguments. Religious freedom is a bedrock right that ensures all can live according to their convictions. It also allows for the existence of charities providing Americans with an equivalent of \$1.2 trillion annually in food, shelter, medical care and more It is not a ool to protect harmful practices like female genital muti-

These girls are among the most vulnerable in society. For their sake, Americans must raise their voices against this detestable practice. Doing what is right may also yield an important social good: the restoration of religious freedom to its proper place in American culture and jurisprudence.

Ms. Arriaga is a contributor at the Pepperdine School of Public Policy.

#### FGM Is Abuse, 'Culturally Sensitive' or Not

Kristina Arriaga has her facts wrong ("Cutting Young Girls Isn't Religious Freedom," Houses of Worship, Aug 25). Neither I (nor Mayer Morganroth) are representing the doctor in the Michigan case. I am consulting with the religious group in an effort to strike the proper constitutional balance between religious freedom and the rights of children. Ms. Arriaga purports to quote an interview in which she says I advocated the "pricking [of] the girls' clitoris." I have never advocated a pricking of the clitoris, but rather a benign, ster-

ilized, symbolic pinprick in the hood covering the clitoris, which is much like the foreskin of the penis.

This is what I said in the interview: "I am categorically opposed to female genital mutilation" (FGM) and argued that if the symbolic pinprick is adopted "it will help protect young girls and it will help protect religious rights." You wouldn't know that reading the op-ed.

The symbolic pinprick is modeled on the Jewish tradition when a non-Jewish child has been secularly circumcised and then converts to Judaism. The pinprick itself, like cosmetic ear piercing, has no medical benefits or harm. But it is less intrusive than procedures practiced by some groups, while protecting the constitutional right of its religious practitioners.

ALAN M. DERSHOWITZ Cambridge, Mass.

While federal law bans FGM, only 25 U.S. states specifically outlaw the procedure, making local prosecution difficult. Ohio doesn't statutorily forbid FGM. The Ohio Department of Public Safety instead published "A Guide to Somali Culture" for first responders and law enforcement to achieve "cooperation, understanding, mutual respect, and harmony" with Columbus's Somali immigrants. The guide devotes more than four pages to the Somali-Muslim cultural-religious practice of FGM.

Instead of criminalizing FGM to protect little girls, the ACLU prefers culturally sensitive outreach to the Somali community. Would society permit such blatant child abuse from non-Muslim parents? Why do Muslims get a pass? We need to make it clear to new immigrants that Americans do not tolerate child abuse in the form of FGM.

Kristine M. Severyn, Ph.D., R.Ph. Dayton, Ohio