

THE NEW DUAL CITIZENSHIP LAW OF LIBERIA 'READINGS AND ANALYSES'

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ABSTRACT

The Alien and Nationality Law of 1973 illegalized the dual citizenship practice in Liberia. Hence, the public debate reemerged as regard to this issue when Liberians in their numbers migrated and fled the Civil War (1989-2003) seeking refuge in other nations, where most of them were compelled and constrained to acquire another nationality. Some Liberians view that it should be absolutely allowed referred therein as (The Absolutists), other group of Liberians opine that it should be allowed with certain restrictions (The Restrictionists). Meanwhile, the third opinion suggests that it should not be allowed at all (The Prohibitionists). In view of this, the subject was listed among other things by the Constitutional Review Committee for a possible amendment as it is impliedly prohibited by the Constitution under article 28. While awaiting for the amendment through referendum in 2023 after the first attempt failed to meet threshold in 2020 as declared by the NEC, the new dual citizenship law legalizing the practice had been respectively passed and signed the Legislature and President. The article aims at discussing the public

debates on and positive and negative socioeconomic implications of dual citizenship in Liberia. This work adopts qualitative research method, where it relies on previous published materials and public debates from local intellectual centers, social medial discussions and radio stations' talks shows on the subject. It is concluded that the new law may open doors of socioeconomic and political opportunities for Liberians by birth with different nationalities and neutralized citizens to comfortably invest in the country's economy, and of course, may help to change the development narratives of Liberia.

INTRODUCTION

Liberia was one of those nations that prohibited dual citizenship until the passage of the new dual citizenship law by the Legislature and, had been signed by President . The exercise of dual citizenship had not been allowed by Liberia under the Alien and Nationality Law of 1973. The legislative history of this illegality of dual citizenship in Liberia can be traced in the 1956, Aliens and Nationality Law as found under Title 3 of the Liberian Code of Laws Revised. This law was repealed and amended in 1973 by the Forty-Fifth Legislature by introducing the New Aliens and Nationality Law of 1973 found under Title 4 of the Liberia Code of Law, the said repeal and amendment gave a rise to illegalization of dual citizenship under section 22.1 and 22.2 of the new law approved in 1974 (Arthur,1991).

Further, the impact and implication of this illegality were unnoticed until the Civil Wars erupted in the early 1990s that forced hundreds of thousands of Liberians to seek refuge in other countries, mainly those with socioeconomic opportunities such as the United States of America, European Countries and some African nations in near and afar. Due to this massive outflux of Liberians seeking a better living condition fleeing the War, most of them acquired nationalities of their host nations and their children who were born therein became nationals of those countries as well based on their municipal jurisprudence . Coincidentally, this year (2022) marks 200 years since the first batch of the freed slaves arrived to shore of Monrovia from the United States of America. The movement that marked the modern beginning of the Republic of Liberia (Brandolini & others, 2006). As the event being celebrated by Liberia, His Excellency, President George M Weah has named 2022 a year of return. The celebration has sparked an already public debate on necessity of legalization of dual citizenship as way of encouragement for diaspora Liberians and their relatives to return home to contribute to socioeconomic development of

their country. However, with illegality of dual citizenship by 1973 Alien and Nationality Law, most of them consciously or subconsciously feel, especially their children who were born in the exile during crises and while their parents looking for better economic opportunities and subsequently obtained citizenship of those countries, reluctant because their country of origin has automatically renounced their citizenship based on article 28 of the 1986 Constitution and the Alien and Nationality law of 1973. The new law allows dual citizenship for Liberians with, of course, some restrictions in holding certain sensitive positions in the government and running for elective offices. Nevertheless, article 28 of the 1986 Constitution remains unamended-, that impliedly prohibits dual citizenship -, because it along with other 8 propositions for the 2020 referendum to amend the Constitution did not met the threshold of at least the two-third of the valid votes to approve the amendment . Thus, the new legislation seems to be in conflict with the said article (Berg & others, 2015).

LITERATURE REVIEW ON LIBERIA'S DUAL CITIZENSHIP DEBATE

The socio-political and demographic debate on the legality and illegality of dual citizenship in Liberia has been around for some times. However, the discussion received an attentive public discourse upon the end of the Civil Wars when Liberians in the diaspora with different nationalities mainly the Americans and European plan to return home to form a part of the body politics and investments. Since then, there have been both academic publications and advocate movements through public discourses and writings on this subject matter. Among the lead academics who have extensively written and published on socioeconomic, histropolitical and development of dual citizenship in Liberia is Dr Robtel Neajai Pailey, a Liberian academic and Assistant Professor in International Social and Public Policy at the London School of Economics (Butman, 2009). She has a book entitled Development, (Dual) Citizenship and its Discontents in Africa: The Political Economic of Belonging to Liberia, where she argues that there is contradiction between the Liberian Laws themselves as regard with citizenship. Before the passage of the Dual Citizenship of Law of Liberia that is under our discussion, Article 28 of the organic law of the land (the 1986 Constitution) affirms the rights of every Liberian by birth to retain his or her citizenship indefinitely and entitles Liberians by ancestry to their Liberian citizenship on the condition that they renounce their birthplace nationality upon reaching adulthood and Sections 22.1 and 22.2 of its 1973 Aliens and Nationality Law, which automatically revoked the legal citizenship status of Liberian-born nationals of 'Negro descent' who naturalized in, declared formal allegiance to, entered into the armed forces of, voted in the elections of, or formally renounced Liberian citizenship in a foreign state. This work is the most extensive academic piece so far in the area of dual citizenship research on Liberia (Adepoju, 2003).

Rodney Sieh, of the FrontpageAfrica, in his editorial under the title: Diaspora Liberians See Resentment, Discrimination in Senate Amended

Dual Citizenship Bill outlines views of Liberian Diaspora organizations in the United States of America such as Union of Liberians in America (ULAA), in Europe Union such as European Federation of Liberian Association (EFLA) and the Union of Liberian Organizations in the United Kingdom have all advocated for the dual citizenship law in Liberia with not discriminative elements towards natural born Liberians (Codjoe & others, 2013).

In 2011, under the former President Ellen Johnson Sirleaf, a group of Liberians in the United States of American petitioned the Sirleaf-led administration to legalize dual citizenship mainly for the economic interest of Liberia as pointed by out Abraham Kamara of the Organization for the Promotion of Development in Liberia based in the USA (Cosmas, 2015). It is highly debated and, perhaps criticized that Diaspora Liberians dismally invest in Liberia as compared to their counterparts in the subregion mainly in Guinea Conakry, Sierra Leon, Ghana, Nigeria and La Cote d'Ivoire. One hardly notices the anticipated tangible investment by Liberians in the United States and Europe in Liberia as argued by some of their critics (Dorjahn, 1970). However, some of diaspora Liberians counter-argue that it is because of prohibition of dual citizenship, they and their children with other nationalities are not motivated by Liberia investment by risking their money in Liberia where they have been considered by the current law as aliens who have restricted business and investment opportunities (Covington-Ward, 2017).

PUBLIC DEBATES ON DUAL CITIZENSHIP

There have been public debates around legality and illegality of dual citizenship in Liberia since a massive migration of Liberians occurred due to protracted Civil Wars from 1989-2003. There are three dominant public opinions and views among the Liberians. These public views are: Absolute Dual Citizenship (Absolutists), Restricted Dual Citizenship (Restrictists) and Absolute-No to Dual Citizenship (Prohibitionists). The Absolutists for dual citizenship in Liberia believe and argue that, in addition of being their rights as Liberians before taking allegiance to different countries, will also bring economic and technocratic benefits to the nation. According to them, it is fact that Liberians in the diaspora, mainly in the United States and Europe, have access to finances as compared to their brethren back home. And as a post-war country with a dire need to investment and influx of money to carry out rebuilding, reconstruction and creating jobs, diaspora Liberians need to be encouraged and not dissuaded because they have acquired another nationalities. That is economic aspect, as for the technocratic standpoint, they further argue that, they had opportunities to acquire diverse and needed skills in advance economies which may help tremendously to fill up the human resources gap in Liberia. On the other hand, those who hold the view that dual citizenship should not be legal and allowed argue that it will affect the economy and the security of the nation (Greher, 1995).

According to a research and opinion pool conducted by the Constitutional Review Committee on the dual citizenship, the argument for and against the subject was made as follows: ‘There is also the argument that dual citizenship may drain the Liberian economy and expose the nation to unpatriotic acts (Iheduru, 2011). They contend that Liberians in the diaspora have never been discriminated against and that article 22 of the constitution which provides that only Liberian citizens can own property has not been utilized against them and so, why would those citizens who willingly chose not to be Liberian citizens press for amendment of the constitution to make Liberia a dual citizen state? But there are other citizens of Liberia who believe Liberians are still living in primitive past in an advanced global society. It is their conviction that dual citizenship is cardinal to the nation’s development and as such the constitution should provide for it. They believe that in such a case, there has to be a provision that such citizens would not be qualified for the positions of managing directors, cabinet ministers, senators, representatives, vice president and president unless they have spent five years or above in Liberia. Their debates are that dual citizenship will enable Liberians who lost their citizenship to be more active and nationalistic in the development of their motherland and that the acquisition of citizenship of another land is not a fault of their own; but that of the civil war which engulfed Liberia for a decade and three years (Islam, 2022). They claim that citizenship of those countries was compelling in terms of obtaining education, job, and securing their fundamental rights. That, according to them, does not indicate that Liberia is no longer their motherland to which they owe utmost loyalty, patriotism, and belonging. What do you have to say? These are arguments presented from both sides to the CRC at intellectual forums, community outreach and drawn from suggestion boxes’ (Islam, 2018).

Finally, the third group of people in connection with dual citizenship in Liberia are those who are of the opinion that it should be allowed and made legal with certain restrictions especially in the political space. This last view is the one that was highly considered by legislature when passing the newly enacted dual citizenship law. The act places restrictions on the holders of different nationalities to hold certain unelected positions and, relinquish their second citizenship when contesting electing positions. Below are the some of the impressions and prior debates on the dual citizenship in Liberia as provided by Dounard Bondo,

- (i) In 2015, delegates at a constitutional review committee also voted against dual citizenship. Prior to that, a bill that sought to allow for dual citizenship failed in 2008.
- (ii) In a 2018 Afrobarometer survey, two-thirds of Liberians said they oppose dual citizenship as a matter of national policy.
- (iii) In 2019, Alvin Teage Jalloh, a Liberian by birth who became an American citizen while residing in the US, requested travel documents to travel to Monrovia but the Liberian Embassy in Washington, DC, rejected his request. He sued the Liberian

- government, and its apex court ruled in his favour – a landmark decision .
- (iv) Analysts argued that the 2019 Supreme Court decision did not grant dual citizenship to all citizens but instead rejected the idea that citizens should be stripped of their Liberian citizenship if they acquire another.
 - (v) In 2020, despite significant campaigning by the government for a repeal of the old law, Liberians voted against allowing dual citizenship in a national referendum.

THE CONSTITUTION VS THE LEGISLATIVE ACT ON DUAL CITIZENSHIP

By the passage of the dual nationality law, it seems to be a conflict between the 1986 constitution and the said law. The first allows and legalizes it while the later- as up to this date 7/September/2022 – maintains prohibition of dual citizenship. Article 28 of the constitution reads in connection with subject as follows ‘Any person, at least one of whose parents was a citizen of Liberia at the time of the Person’s birth, shall be a citizen of Liberia; provided that any such person shall upon reaching maturity renounce any other citizenship acquired by virtue of one parent being a citizen of another country (Jones, 2020). No citizen of the Republic shall be deprived of citizenship or nationality except as provided by law; and no person shall be denied the right to change citizenship or nationality’ . It is vividly clear from this article of the constitution that any person, at least one of whose parents was a citizens of Liberia at the time of his or her birth shall remain a Liberian until he or she reaches maturity either to remain as a Liberian by renouncing the citizenship of his or her foreign parent. This implies prohibition of dual citizenship. And that is the constitution, the organic law of the land that cannot be changed or amended except through referendum that was not the case before the House legislated the new dual citizenship law (Jürgens, 1966). In conclusion, there are currently two laws in Liberia as regard to dual citizenship, the 1986 constitution that still contains the implied prohibition of the practice and the new amendment to the Aliens and Nationality Law that expressly allows the practice. In this case, there is still a need to amend article 28 of the constitution to avoid any legal challenge in case there is a case questioning the legality and constitutionality of the new dual nationality law at the court of competent jurisdiction (Islam, 2015).

PROJECTED ECONOMIC AND DEVELOPMENT DIVIDENDS OF DUAL CITIZENSHIP FOR LIBERIA

The proponents of dual citizenship in Liberia have two major backing points; they argue that it is their inalienable right not to lose their natural citizenship of their country of origin. They also contend and claim that legalize dual citizenship or nationality would be a great economic opportunity for Liberia in the sense that it will encourage Liberians in the

diaspora to return home and make investment in different sectors, it will also allow them to actively participate in socioeconomic politics with skills acquired by them in the Americas and Europe mainly (Kannof, 2011). It is a fact the diaspora Liberians have access to more finances as compared to the counterparts back home and because of the repealed law that prohibited dual citizenship and placed certain restrictions on them may have had a negative impact on anticipated economic and entrepreneurial participation of Liberians with other nationalities in the exile as compared to their counterparts in the neighbouring countries such as La Guinea Conakry, Sierra Leon, Ghana, Nigeria, La Coté d'Ivoire, Senegal and others. These countries experience economic growth and infrastructural development in real estate industry undertaken by their citizens in Europe and the Americas. In addition to annual remittance to the family back home very year, direct businesses and development project carried out by Liberians in the diaspora can and will be a significant contribution to changing development narratives of the country (Kilby, 2021).

DUAL CITIZENSHIP IN INTERNATIONAL LAW AND DIPLOMACY

Dual nationality may cause a legal intricacy as there may be a conflict of applicable laws on the holder of dual citizenship. That is, which laws should be considered when a dual national find himself in and amidst of conflicting laws? To address this issue, international law comes into play. Non-State responsibility and The Dominant and Effective Theories have been created by international law to lay out factual elements and determinant of cases involve dual national at times of conflict of laws (Kollehlon, 1986). Therefore, it is pertinent to shed light on these two major international law theories as regard to dual nationality in following.

The State Non-responsibility Theory

The doctrine of state non-responsibility denotes that, in space of international law and arbitration, all the states that a dual national holds their citizenship are domestically competent to bring a claim on behalf of him or her. However, none of them has jurisdiction to present the case of dual national against another state which he or she is a national as well (Ludwig, 2016). This doctrine has its foundation in article 4 and article 5 of 1930 Convention of Certain Questions Relating to Conflict of Nationality Laws as clearly depicted in the following 'A State may not afford diplomatic protection to one of its nationals against a State whose nationality such person also possesses.' Based on this theory, a Liberian with a dual citizenship can be tried and adjudicated according to the Liberian law without any immunity from another state that he or she holds its citizenship as well (Aje, 2013).

The Dominant and Effective Theory

The dominant and effective theory of nationality is another international law doctrine that looks into cases involving dual or multiple nationals. It simply denotes that a dual national will hold only the dominant and effective nationality whenever there is a conflict of law between the states that he holds their citizenship. In other words, for the purposes of international law, a dual national's primary national allegiance in terms of his nationality prevails. The test of the theory was first applied in 1834 by the Privy Council of the United Kingdom in the Drummond's Case. It was later also recognized by the International Court of Justice in 1955 in the context of diplomatic protection, in the *Nottebohm* and the *Mergé* judgements. For the sake of codification, the doctrine was codified in 1930 by Article 5 of the Hague Convention on Conflict of Nationality Laws that reads as follows: 'Within a third State, a person having more than one nationality shall be treated as if he had only one. Without prejudice to the application of its law in matters of personal status and of any conventions in force, a third State shall, of the nationalities which any such person possesses, recognize exclusively in its territory either the nationality of the country in which he is habitually and principally resident, or the nationality of the country with which in the circumstances he appears to be in fact most closely connected. Besides, in the 1961 Harvard Draft Convention on International Responsibility that was developed by International Law Commission in 2001 and, it has been cited by International Court of Justice (ICJ) and later in 2006, the ILC Draft Articles on Diplomatic Protection also codified this theory as found in article 7 that reads as follows: 'A State of nationality may not exercise diplomatic protection in respect of a person against a State of which that person is also a national unless the nationality of the former State is predominant, both at the date of injury and at the date of the official presentation of the claim' (Mashizha & others, 2018).

In order to establish the dominant and effective nationality whenever there is conflict on an individual's nationality with a dual citizenship, the practice has put into place certain indicators and factors as to determine the primary nationality. Those determinants were established by the International Court of Justice's decision in *Nottebohm (Liechtenstein v. Guatemala)*, a 1953 nationality case that involved Mr Friedrich Nottebohm who was both German and Liechtenstein national residing in Guatemala. The claim was filed by Liechtenstein against Guatemala for an improper action towards Mr Nottebohm. However the claim was inadmissible on the ground that Mr Nottebohm's nationality with Liechtenstein did not meet the dominant and effective theory's requirements as detailed by the Court's judgment in following (Banton, 2019).

In this case, Liechtenstein claimed restitution and compensation from the Government of Guatemala on the ground that the latter had acted towards Friedrich Nottebohm, a citizen of Liechtenstein, in a manner contrary to international law (Pailey, 2007). Guatemala objected to the Court's jurisdiction but the Court overruled this objection in a Judgment of 18 November 1953. In a second Judgment, of 6 April 1955, the Court held that Liechtenstein's claim was inadmissible on grounds relating to Mr.

Nottebohm's nationality. It was the bond of nationality between a State and an individual which alone conferred upon the State the right to put forward an international claim on his behalf. Mr. Nottebohm, who was then a German national, had settled in Guatemala in 1905 and continued to reside there. In October 1939 — after the beginning of the Second World War — while on a visit to Europe, he obtained Liechtenstein nationality and returned to Guatemala in 1940, where he resumed his former business activities until his removal as a result of war measures in 1943. On the international plane, the grant of nationality is entitled to recognition by other States only if it represents a genuine connection between the individual and the State granting its nationality (Pailey, 2016). Mr. Nottebohm's nationality, however, was not based on any genuine prior link with Liechtenstein and the sole object of his naturalization was to enable him to acquire the status of a neutral national in time of war. For these reasons, Liechtenstein was not entitled to take up his case and put forward an international claim on his behalf against Guatemala.' The practice has established different factors and indicators of the doctrine of Dominant and Effective such as habitual residence of the dual national, center of his interest, family ties, his active participation in public life etc (Scanlan, 2022).

CONCLUSION

The Alien and Nationality Law of 1973 illegalized dual citizenship in Liberia. However, the public debate reemerged as regard to this issue when Liberians in their numbers migrated because of Civil War (1989-2003) seeking refuge and a better living condition in Europe and United States of America where most of them were compelled and constrained to acquire another nationality for socioeconomic reasons. There have been different public opinions as whether to allow dual citizenship in Liberia or not. Some Liberians view that it should be absolutely allowed (the Absolutists), other group of them opine that it should be allowed with certain restrictions (the Restrictionists). Meanwhile, the third opinion suggests that it should not be allowed at all (the Prohibitionists). In view of this, the subject was listed among other things by the Constitutional Review Committee for the possible amendment as it is impliedly prohibited by the Constitution of the Land under article 28. While awaiting for the amendment, the both Houses of Legislature had passed dual citizenship law legalizing and allowing the practice and, the law had been signed by the President. Besides, it seems-, as long 28 of the Constitution has not be amended yet, there is a contradiction between the new law and the organic law, the former allows the dual citizenship while the latter illegalizes it somehow (Antwi-Boateng, 2011).

The new law also, places some restrictions on Liberian dual nationals in terms of holding public offices both elective and appointed. For the appointed positions, article 4(2) lists these followings not to be held by a dual national; Governor of Central Bank, Minister of Finance and Development Planning and Minister of National Defence. For the elective

position, article 4 (1) of the New Dual Citizenship Law conditions for any Liberian who holds the citizenship of another country and desires to run for a public office, to renounce that citizenship at least one year prior to applying to the National Elections Commission (NEC). It is obvious that legalizing dual citizenship is an issue of necessity now for the country because, in practice, most the high profiled political figures that have been in the United States and other parts of the Western World already have dual nationality and serving the nation in portfolios that were not allowed by a dual national by the old law (1973 Nationality Law). So, officially allowing the practice was a matter must, I presume!. Finally, considering the socioeconomic situation of Liberia, dual citizenship may open different doors of business and economic opportunities for Liberians by birth with different nationalities and neutralized citizens to comfortably invest in the country's economy. Thus, it incumbent on the government now to aggressively engage Liberians in the diaspora and dual-nationals to invest and actively contribute to economic activities and taking the country to the next level of prosperity and development.

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