

RESEARCH NOTE

Qaddafi Reconsidered

by *Michael M. Gunter*

It has been more than a decade since Mu'ammar Qaddafi's Libya became synonymous with terrorism and was branded an inveterate enemy of the United States.¹ The Lockerbie bombing of Pan Am Flight 103 in December 1988, the La Belle discotheque bombing in April 1986, the Gulf of Sirte clashes in 1981 as well as a number of other events helped lead to this situation.² The United States imposed highly damaging economic sanctions on Libya's US-dependent economy in 1986,³ while the United Nations Security Council placed mandatory economic sanctions on Libya in 1992 and 1993.⁴

In the succeeding years little more was heard from Qaddafi as these sanctions took their effect and helped cripple the Libyan economy and involvement in world affairs.⁵ Now, with the beginning of the new century and the suspension of the UN sanctions in April 1999, the time has come for the United States to reconsider and possibly change its stance. There are a number of reasons for this assessment.

In the first place the perspective of time enables one to consider Qaddafi more rationally and less emotionally. The United States after all had long been the main supporter of Israel, seen by most Arabs as a Western colonial usurper of Arab lands and rights.⁶ To confront the much more powerful American foe, some radical, but relatively weaker, Arab states - such as Qaddafi's Libya - turned to terrorism as their most effective weapon.⁷ In so doing, they argued that they had no other alternative and that the United States itself also used terrorist tactics when it suited its purposes.⁸ Viewed from this perspective, it is possible to regard what passed between Qaddafi and the United States as more of an undeclared low-level conflict than mere criminal terrorist behavior on Qaddafi's part.⁹ Indeed, over the years, the United States's evaluation of others it once called terrorists has already changed. Yasser Arafat, Nelson Mandela and Jerry Adams come readily to mind.

When the United States aided the Contras against the Sandinista government of Nicaragua in the 1980s, it was for the supposed higher purpose of supporting "freedom fighters." The International Court of Justice (ICJ) thought otherwise, however, and declared that participation in a civil war by "organizing or encouraging the organization of irregular forces or armed bands . . . for incursion into the territory of another State" and by "participating in acts of civil strife . . . in another State" was not only an act of illegal intervention in the domestic affairs of a foreign state, but also a violation of the principle of the prohibition of the use of force.¹⁰

Arrogantly, the United States already had withdrawn from the merits phase of the Nicaragua Case after announcing that it "reserves its rights in respect of any decision by the Court regarding Nicaragua's claims."¹¹ Citing Article 53 of its Statute, however, the ICJ declared in no uncertain terms: "The fact that a State purports to "reserve its rights" in

respect of a future decision of the Court, after the Court has determined that it has jurisdiction, is clearly of no effect on the validity of that decision."¹² The conclusion can only be that the United States too has used illegal force in its international relations just as Qaddafi's Libya did.

In 1981, Libya challenged US naval presence in the eastern Mediterranean by unilaterally declaring the Gulf of Sirte an historic bay¹³ and thus Libyan territorial waters. If left unchallenged, this Libyan act would have closed a significant part of the high seas to potential US naval operations. To maintain its international rights, however, the United States did not have to goad Qaddafi into armed conflict by sending a naval force into the Gulf of Sirte. Given Qaddafi's unilateral attempt to alter the legal regime of the Gulf, a mere diplomatic protest - joined perhaps by other concerned maritime powers refusing to recognize this move - would have sufficed.¹⁴

In its celebrated Corfu Channel Case, the ICJ rejected the British claim that they had the legal right to intervene in order to sweep mines away from Albanian territorial waters: "The Court can only regard the alleged right of intervention as the manifestation of a policy of force, such as has, in the past, given rise to most serious abuses and such as cannot, whatever be the present defects in international organization, find a place in international law."¹⁵ Even though the Gulf of Sirte incident and Corfu Channel Case are certainly not identical, the Court's import in the latter case was clear. Although it may be annoying for a stronger state not to be able to use force against a weaker state that has violated its legal rights, as UN Charter Article 2(4) declares, "all states have a legal obligation to refrain in their international relations from the threat or use of force." In the Gulf of Sirte incident, therefore, one might argue that the United States illegally used the threat of force against Libya to assert its legal rights.

Libya, however, was a much softer target than Iran and Soviet-backed Syria - two other states the United States branded as terrorist. Therefore, the United States felt free to dare Qaddafi to knock the chip off its shoulder,¹⁶ and the Libyan leader foolishly and unsuccessfully tried. As argued above, however, the United States could have maintained its rights in the Gulf of Sirte without resorting to such military pyrotechnics and indeed probably would have with a Syria or Iran. Indeed, just a year earlier Iran had committed a much more egregiously illegal act in holding hostage the US diplomatic staff in Tehran for more than a year before the United States even tried (unsuccessfully) to rescue them by using force on a much smaller scale than used against Libya in the Gulf of Sirte. Some time later, the hostages were freed through diplomacy and (it should be noted) the implied threat of what the new Reagan administration might do.

In 1986, the United States accused Libya of bombing the La Belle discotheque in Berlin, an act that resulted in the deaths of two US servicemen and the wounding of 200 others, including 64 US citizens. Claiming self-defense under the provisions of UN Charter Article 51,¹⁷ the United States retaliated by bombing several Libyan targets. These US attacks killed some 37 Libyan civilians, including Qaddafi's adopted infant daughter Hana'a, and were probably illegal under international law.

Although there can be no doubt that Libya had sponsored numerous terrorist outrages, the legal question was whether, from the point of view of international law, such acts constituted an "armed attack" by Libya, thereby legitimizing "self-defense" by the United States. Legally, the American case was less than certain. Moreover, the tangible evidence that supposedly linked Libya to the La Belle discotheque bombing was never made public, supposedly for reasons of national security. Given the Reagan administration's earlier willingness to employ a disinformation campaign against Qaddafi involving reputed Libyan assassins sent to the United States to assassinate President Ronald Reagan,¹⁸ one might reasonably query the validity of the evidence claimed at the time of the 1986 air raid. Although this earlier deception involving reputed Libyan assassins did not necessarily mean that the evidence for the discotheque bombing was tainted, it did serve at the time to question the credibility of the United States. While it now appears that Libya was indeed responsible for the discotheque bombing,¹⁹ the question remains whether this bombing constituted an "armed attack" against the United States. Ironically, one might better argue that it was the United States itself that had carried out the "armed attack" when it attacked Libya.

Was the US attack on Libya then a legal exercise of "self-defense" as the term is used in UN Charter Article 51? International law prescribes that two basic requirements be met before "self-defense" can justify the usage of military force: first, actual necessity, and second, proportionality. The first provision means, as US Secretary of State Daniel Webster so eloquently put in 1841, that "it will be for that government to show a necessity of self-defense, instant, overwhelming, leaving no choice of means, and no moment for deliberation."²⁰ Judged by this criterion, the US attack against Libya cannot be justified as "self-defense."

As for the principle of proportionality, international law requires - as stated in the famous Naulilaa Incident Arbitration dating from World War I - that "one should certainly consider as excessive, and thus illegal, reprisals out of all proportion with the act which motivated them."²¹ Even if all the alleged Libyan terrorist acts had actually been perpetrated, it is difficult to argue that the US air raid, which wounded and killed innocent civilians, was a proportionate response. Thus, the US air raid against Libya in April 1986 demonstrated the willingness of the United States to deal with Qaddafi outside the strict bounds of international law.

The specific terrorist act that led to the UN Security Council economic sanctions against Libya in 1992 was the notorious bombing of Pan Am Flight 103 over Lockerbie, Scotland on 21 December 1988 that killed 270. At first, however, suspicion for this outrage had fallen on Ahmed Jibril's Syrian-based Popular Front for the Liberation of Palestine-General Command (PFLP-GC). With Syrian collusion, Jibril's radical PFLP-GC had supposedly accepted a "contract" from Iran to avenge the accidental US destruction of a civilian Iranian airliner over the Persian Gulf in July 1988.²² As recently as June 2000, Ahmed Seyyid Behbahani, a former Iranian intelligence officer and now a defector, reiterated a version of this scenario that also included Libyan operatives to do the job.²³

Eventually, however, Libya alone was implicated,²⁴ and a US grand jury finally indicted two Libyan nationals - Lamin Khalifa Fhimah, the former manager of the Libyan Arab Airlines office in Malta, and Abdel Basset Ali al-Megrahi, a high-level intelligence official - for the deed. A British court also indicted the two Libyans. Although continuing to maintain his innocence, Qaddafi eventually offered to pay compensation to the victim's families and in April 1999, finally handed over the two suspects for trial under Scottish law in a Dutch court. The UN Security Council then reciprocated by suspending its sanctions against Libya. One month earlier a French court had convicted in absentia six Libyans, including Qaddafi's brother-in-law Muhammad Sanusi as the mastermind, in the bombing of the French UTA 772 plane over Niger in 1989 that had cost 171 lives. In this second case, Libya had agreed to pay \$40 million in compensation.

Although al-Megrahi was recently found guilty in the Pan Am 103 bombing, the point is that these terrorist acts occurred more than a decade ago during a period of low-level conflict between Libya and the West. Moreover, the United States itself - in addition to such arguably illegal military acts as bombing Libya almost three years before the Lockerbie bombing - also apparently sponsored what some might call its own acts of state terrorism. During the 1984 presidential elections, for example, a US Central Intelligence Agency (CIA) handbook detailing the act of political assassinations in Nicaragua actually became a source of embarrassment for the United States.²⁵ In March 1985, the CIA apparently used local agents in an unsuccessful attempt to kill the radical Islamic leader Sheikh Muhammad Hussein Fadlallah in Lebanon. The car bomb these CIA proxies planted, however, instead killed scores of innocent bystanders.²⁶

Moreover, during the 1960s, again acting under ultimate orders of the US president himself, the CIA had attempted to assassinate such prominent national leaders as Fidel Castro of Cuba, Patrice Lumumba of the Congo, Rafael Trujillo of the Dominican Republic, Ngo Dinh Diem of South Vietnam and Abdul Karim Kassem of Iraq, among others. As revealed by the US Senate Select Committee on Intelligence (Church) Committee, the specifics of these earlier acts of US-sponsored state terrorism were implemented in such ways as to give the US government plausible deniability for its actions.²⁷

More recently, in 1998, the United States bombed a pharmaceutical plant in Sudan, claiming that it had some kind of a connection with materials used by Osama bin Laden to bomb the US embassies in Kenya and Tanzania. Further evidence, however, indicates that this US action was probably based on faulty intelligence interpretation.²⁸ The point to be made again is that, without giving legitimacy to his acts, Qaddafi has not been the only perpetrator of actions that might be called terrorist. As the more powerful antagonist, however, the United States had been able to paint its acts as legitimate reprisals (bombing Libya in 1986) or honest mistakes (bombing Sudan in 1998). Weak Libya, however, has successfully (and not without some merit it should be granted) been branded as a terrorist state.

Even at his worst, however, Qaddafi never started a war against the United States or committed genocide (against the Kurds) as did Saddam Hussein's Iraq. The US State

Department itself grants that Qaddafi has not committed any major act of terrorism in over a decade.²⁹ At a meeting of Arab leaders in the Libyan city of Sirte in June 1999, Qaddafi advised his colleagues to avoid confrontation with the West because it would not pay for smaller states to be the West's target. He also declared that it had been "stupid" on the part of Yugoslav president Slobodan Milosevic to provoke NATO into bombing his country,³⁰ and later offered strong support to the new government of Vojislav Kostunica. Shortly after Kostunica assumed power in October 2000, for example, Qaddafi sent a special envoy to Belgrade to congratulate the new Yugoslav president and present him with a check for 1.7 million Swiss francs for humanitarian purposes.³¹

In recent years, one might even argue that Libya has been implicitly furthering the US goal of regional stability in Africa by being the only African state to give foreign aid to other African states. Qaddafi has also personally sought to mediate several on-going African conflicts in Sudan, Ethiopia-Eritrea, Congo-Uganda and Sierra Leone.³² In 1999, Libya expelled the extremist Abu Nidal organization from its territory, distanced itself from other Palestinian rejectionists and implicitly supported the Israeli-Palestinian peace process by agreeing to back any deal Yasser Arafat's Palestinian Authority finally makes with Israel.

Finally, in an act of personal courage that arguably demonstrates his sincere hatred of imperialism and romantic commitment to what he perceives as justice, Qaddafi is the only Arab leader who has consistently spoken out on behalf of Kurdish rights. When Turkey finally captured the Kurdish rebel leader Abdullah (Apo) Ocalan in February 1999, for example, Qaddafi released a lengthy statement comparing Ocalan's capture to earlier failed Ottoman attempts to stamp out Arab revolutionaries. The Libyan leader then declared: "To my Kurdish brothers . . . Do not weaken or be sad for the more your enemy spills your blood the more he adds fuel to the fire of the Kurdish revolution . . . Denying the right of nations to independence constitutes an act of ignorance and shows superficiality, selfishness and ignorance of history."³³ Yet most commentators simply cite Qaddafi's longtime support for the Kurds as just another example of his impulsive eccentricity.³⁴

Even before UN Security Council sanctions were suspended, Nelson Mandela - now a paragon of legitimacy and statesmanship according to the United States - signaled his acceptance of Qaddafi by visiting him in Libya in October 1997. Britain reestablished its long-broken diplomatic relations with Tripoli in July 1999, after Libya paid compensation to the family of Yvonne Fletcher, the British police officer killed by gunfire from the Libyan embassy in London during a demonstration in 1984.³⁵ Egypt's president Hosni Mubarak, another close friend of the United States, has lent new legitimacy to Qaddafi by meeting with him in Egypt in October 2000. The European Union is now trading with Libya. German Chancellor Gerhard Schroeder met briefly with Qaddafi at a conference in May 2000, becoming the second EU leader after Italian Prime Minister Massimo D'Alema to do since the UN sanctions were suspended.

Although recognizing improvement in its behavior and despite all these developments, the United States continues to argue that Libya still has not complied with the remaining

UN Security Council requirements concerning the bombing of Pan Am 103: "payment of appropriate compensation; acceptance of responsibility for the actions of its officials; renunciation of, and an end to, support for terrorism; and cooperation with the prosecution and trial It remained unclear whether his [Qaddafi's] claims of distancing Libya from its terrorist past signified a true change in policy."³⁶ If the United States does not change its dated policy soon, however, it might find itself needlessly shut out of the emerging new relationship.

Ending sanctions would not be giving in to terrorism. Qaddafi has been made to pay the price for his past mistakes. In addition, as pointed out above, the United States itself does not have entirely clean hands either. Normalizing relations with Libya will be a win/win situation for both sides. If this reevaluation proves incorrect, there is nothing to prevent the United States from reimposing sanctions. The bet here, however, is that Qaddafi will become a positive factor from the over-all view of the United States without sacrificing his independence or dignity to the United States. In the long run, both the United States and Libya will benefit from this new situation.

Endnotes

1. Milton Viorst, "The Colonel in His Labyrinth," *Foreign Affairs* 78 (March/April 1999), pp. 60-75; and Ronald E. Neumann, "Libya: A US Policy Perspective," *Middle East Policy* 7 (February 2000), pp. 142-45. See also the annual editions of United States Department of State, *Patterns of Global Terrorism*, published each April; and, for background, Mahmoud G. El-Warfally, *Imagery and Ideology in U.S. Policy Toward Libya, 1969-1982* (Pittsburg, PA: University of Pittsburg Press, 1988).

2. For a discussion of numerous other terrorist events, see David Tucker, *Skirmishes at the Edge of Empire: The United States and International Terrorism* (Westport CT: Praeger, 1997); and Rod Nordland and Ray Wilkinson, "Inside Terror, Inc.: Libya and Syria Sponsor Groups that Kill in the Name of Palestinian Rights," *Newsweek*, 7 April 1986, pp. 25-28.

3. Since 1982, the United States had closed its borders to Libyan petroleum and imposed an economic embargo on selected high-technology exports and products related to oil extraction. The 1986 sanctions severed all economic and commercial relations with Libya, and were followed by the Iran-Libya Sanctions Act of 1996 (D'Amato Law), which placed penalties on non-US companies investing more than \$40 million in Libya's oil and gas industry in one year.

4. UN Security Council Resolution 731, 21 January 1992, ordered Libya to hand over for trial the two Libyan agents indicted for the Pan Am 103 bombing, pay compensation, cooperate in the ongoing investigations and cease all support for terrorism. UN Security Council Resolution 748, 31 March 1992, prohibited the export of petroleum, military or aviation equipment to Libya, banned commercial flights to or from Libya, limited Libyan diplomatic representation abroad and restricted Libyan financial activities. Subsequently,

UN Security Council Resolution 883, 11 November 1993, included a limited assets freeze and an oil technology ban.

5. Mary-Jane Deeb, "Qadhafi's Changed Policy: Causes and Consequences," *Middle East Policy* 7 (February 2000), pp. 146-53; and Ray Takeyh, "Qadhafi's Libya and the Prospect of Islamic Succession," *Middle East Policy* 7 (February 2000), pp. 154-64.

6. Support for the Palestinian cause, of course, has not been Qaddafi's only motivation. Other factors include his beliefs on egalitarianism, socialism, Arabism and anti-imperialism - all of which are elaborated upon in the several volumes of his Green Book (Tripoli: The Green Book World Center, 1980). See also Ronald Bruce St. John, "The Ideology of Mu'ammār Al-Qadhafi: Theory and Practice," *International Journal of Middle Eastern Studies* 15 (1983), pp. 471-90; and Ann Elizabeth Mayer, "In Search of Sacred Law: The Meandering Course of Qadhafi's Legal Policy," in Dirk Vandewalle, ed., *Qadhafi's Libya, 1969-1994* (New York: St. Martin's, 1995), pp. 113-37. Thus, in the past, Qaddafi has pursued a Greater Sahara concept from the Atlantic Ocean to Egypt and south to Chad, Pan-Arab ambitions and related attempts to destabilize regimes in Africa, the Mediterranean, the Middle East and various parts of the Third World, Western Hemisphere and Europe. For further background, see René Lemarchand, ed., *The Green and the Black: Qadhafi's Policies in Africa* (Bloomington, IN: Indiana University Press, 1988).

7. Indeed, in the past, terrorist groups from all over the world have trained in Libya. See, for example, even the usually apologetic Geoff Simons, *Libya: The Struggle for Survival* (New York: St. Martin's, 1993), pp. 247 and 263-67.

8. For a discussion of covert plans by the United States to overthrow and possibly even assassinate Qaddafi by supporting anti-Qaddafi exile groups, see Bob Woodward, *Veil: The Secret Wars of the CIA 1981-1987* (London: Simon & Schuster, 1987), pp. 157-58 and 411-12.

9. For a recent examination of Qaddafi's personality, see Frank Anderson, "Qadhafi's Libya: The Limits of Optimism," *Middle East Policy* 6 (June 1999), pp. 77-79. For earlier US intelligence profiles, see Woodward, *Veil*, pp. 94-95, 248-49 and 441.

10. *Nicaragua v. USA*, ICJ Reports 1986, 119. When the United States mined the harbors of Nicaragua in 1984, it was supporting "freedom fighters" against the Sandinistas. When Qaddafi mined part of the Red Sea to strike back at Egypt a few months later, however, it was for "terrorist" purposes.

11. *United States Department of State Bulletin*, March 1985, p. 64.

12. *Nicaragua v. USA*, ICJ Reports 1986, pp. 23-24.

13. Under customary international law, historic bays are those which the coastal state has claimed as internal waters for a considerable period of time because of special historic

rights even though the bays' opening to the high seas exceeds the legal limit of 24 miles now set by the 1982 international law of the sea treaty. The Hudson Bay, with an opening of some 50 miles, is an excellent example of an historic bay. Libya's claim, however, that the Gulf of Sirte, with an opening of 290 miles, is an historic bay not only stretches this opening to the sea beyond all reasonable limits, but also fails to meet the requirement of "a considerable period of time," since Libya only began to assert its claim in 1973.

14. For further analysis, see Yehuda Z. Blum, "The Gulf of Sidra Incident," *American Journal of International Law* 80 (July 1986), pp. 668-77.

15. *Corfu Channel Case*, ICJ Reports 1949, pp. 4, 35. In this particular case, British warships had been struck by mines while exercising a right of innocent passage in Albanian territorial waters that were also recognized as international straits.

16. On this point, see Robert M. Gates, the former director of the US Central Intelligence Agency, *From the Shadows: The Ultimate Insider's Story of Five Presidents and How They Won the Cold War* (New York: Simon & Schuster, 1996), pp. 351-52. "Because it [Libya] was in the poorest position to sustain itself against US actions - military or economic - it became the target for US retaliation against all state-sponsored terrorism." *Ibid.*, p. 352.

17. UN Charter Article 51 declares: "Nothing in the present Charter shall impair the inherent right of individual or collective self defense if an armed attack occurs against the Member of the United Nations, until the Security Council has taken the measures necessary to maintain international peace and security."

18. Brian L. Davis, *Qaddafi, Terrorism, and the Origins of the U.S. Attack on Libya* (Westport, CT: Praeger, 1990), pp. 163-65; and David C. Martin and John Walcott, *Best Laid Plans: The Inside Story of America's War Against Terrorism* (New York: Harper and Row, 1988), pp. 317-21.

19. The evidence is discussed in considerable detail in Davis, *Origins of U.S. Attack on Libya*, pp. 115-18, and supposedly has since been confirmed by material found in the East German Stasi (secret police) files. See *Boston Globe*, 12 July 1990, p. 8. Earlier evidence, however, implicated Syria, not Libya. See Andrew Breslau, "Demonizing Qaddafi," *Africa Report* 32 (March-April 1987), p. 46; and Seymour M. Hersh, "Target Qaddafi," *New York Times Magazine*, 22 February 1987, p. 46. Simons, *Libya: The Struggle for Survival*, pp. 323-25 also argues that the evidence implicating Libya as the sole culprit remains ambiguous.

20. "Note from Daniel Webster, United States Secretary of State, to Henry S. Fox, British Minister to Washington," 24 April 1841, as cited in Edward Collins, Jr., *International Law in a Changing World: Cases, Documents, and Readings* (New York: Random House, 1970), p. 336.

21. "Armed Reprisals: Naulilaa Incident Arbitration," as cited in Collins, *International Law in a Changing World*, p. 336. Reprisals are illegal by definition under modern international law, but the principle of proportionality is still well stated by this classic case.
22. See, for example, Christopher Hitchens, "Minority Report," *The Nation*, 30 March 1992, p. 402; Baffour Ankomah, "What the Conspiracy Theorists Say," *The Middle East*, March 1995, p. 14; and Simons, *Libya: The Struggle for Survival*, pp. 3-14. All 286 on board Iran Air Flight 655 were killed.
23. Selcan Hacaoglu, "Turkey, U.S. Question Iran Defector," Associated Press from Ankara, Turkey, 5 June 2000, accessed over the Internet. Behbahani's charges were televised in the United States on the CBS program "60 Minutes."
24. US Department of State, Fact Sheet: *Additional Information on the Bombing of Pan Am Flight 103* (Washington, DC: Department of State, 18 November 1991), p. 854-58; and "Lockerbie's Murderers," *Economist*, 16 November 1991, p. 51.
25. Woodward, *Veil*, pp. 388-92.
26. Stuart Taylor, Jr. "Lebanese Group Linked to C.I.A. Is Tied to Car Bombing Fatal to 80," *New York Times*, 13 May 1985, pp. A1, A10; and Robin Wright, *Sacred Rage: The Wrath of Militant Islam* (New York: Simon & Schuster, 1986), pp. 96-97.
27. *Alleged Assassination Plots Involving Foreign Leaders* (Washington, DC: Government Printing Office, 1975). See also Thomas Powers, *The Man Who Kept the Secrets: Richard Helms and the CIA* (New York: Alfred A. Knopf, 1987). pp. 336-37, n2. Following the Church Committee revelations, a presidential executive order theoretically banned any further assassination attempts. The United States, of course, would not have been displeased if it had killed Qaddafi during its attack on Libya in 1986. See, for example, Jonathan Bearman, *Qadhafi's Libya* (London: Zed Books, 1986), p. 288. Moreover, David Shayler, a former and now disgruntled British intelligence agent, recently claimed that his government had made an attempt on Qaddafi's life in 1996. "Libya Chief Says Britain Tried to Assassinate Him," *New York Times*, 30 August 1998, I, p. 15.
28. Tom Weiner and Steven Lee Myers, "Flaws in U.S. Account Raise Questions on Strike in Sudan," *New York Times*, 29 August 1998, p. A1.
29. Neumann, "Libya: U.S. Policy Perspective," p. 45.
30. Abdul Rahman Al-Rashid, "Abdullah's Key Move, Qaddafi's Fine Approach," *Arab View*, 6 June 1999, p. 8.
31. *Belgrade Tanjug* in English, 1440 GMT, 18 October 2000, as cited in Foreign Broadcast Information Service (FBIS-EEU-2000-1018), 18 October 2000.

32. Charles G. MacDonald and Michael M. Gunter, "Libya and the U.S.: A Changed Political Dynamic?" *Middle East Insight* 15 (May-June 2000), pp. 18-19. On the other hand, some blamed Libyan supervision of the presidential elections in Ivory Coast in October 2000 for almost causing a civil war in that country.
33. "The Leader of the Revolution Statement," 20 February 1999, provided to the author by Libyan authorities.
34. In 1996, for example, when Qaddafi told visiting Turkish prime minister Necemettin Erbakan that Turkey's Kurds should have independence, *Briefing*, a respected Turkish weekly, called the Libyan leader "some unhinged dictator." "Mr. Erbakan's Famous Mistake," *Briefing*, 14 October 1996, p. 4.
35. The killing of Fletcher had led to a rupture in diplomatic relations between Britain and Libya.
36. United States Department of State, *Patterns of Global Terrorism: 1999 - Overview of State-sponsored Terrorism*, April 2000, accessed over the Internet.