

**“REMEMBER THE LADIES”: A CASE FOR  
LEVERAGING THE WOMEN, PEACE & SECURITY  
ACT OF 2017 TO INFLUENCE PEACEMAKING IN THE  
RUSSIA/UKRAINE WAR**

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ABSTRACT .....	297
INTRODUCTION .....	298
I. OVERVIEW OF UNITED STATES NATIONAL SECURITY GOALS .....	300
<i>A. National Security Strategy</i> .....	300
<i>B. National Security Goals Regarding Russia and Ukraine</i> .....	301
II. U.S. GLOBAL COMMITMENTS.....	301
<i>A. Participation in and Commitments to the United Nations</i> ....	301
<i>B. Commitment to Women, Peace, and Security</i> .....	302
<i>C. Women, Peace, and Security Act of 2017</i> .....	304
III. RUSSIAN INVASION OF UKRAINE .....	309
<i>A. Impact on Women and Children</i> .....	309
<i>B. U.S. Assistance to Ukraine</i> .....	311
IV. LEVERAGING WOMEN, PEACE, & SECURITY IN UKRAINE .....	311
V. WHY WOMEN’S PARTICIPATION IN PEACE & SECURITY MATTERS...	313
CONCLUSION .....	317

ABSTRACT

The United States has overarching and specific national security goals as well as long-standing United Nations commitments for improving global security and prosperity. Based on the growing international recognition of the positive impact of women’s participation in peace processes and post-conflict reconstruction, the United States

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Congress passed legislation mandating that certain federal government agencies promote and support the meaningful inclusion of women in peacemaking and security efforts around the globe. Unfortunately, this legislation did not receive dedicated funding from Congress and its implementation has been spotty. With dedicated funding and the focus that accompanies it, the United States could further support Ukraine in repelling and recovering from the unprovoked Russian invasion by encouraging and facilitating the meaningful inclusion of women at the peace negotiating table and in the post-conflict reconstruction period. This support and encouragement would promote the United States' own security goals by countering Russian aggression directly in Eastern Europe, providing Ukraine a better chance of enduring peace, and a more stable government with greater prosperity as it seeks to join the European Union and the North Atlantic Treaty Organization.

#### INTRODUCTION

The year was 1776. Future First Lady Abigail Adams waited at home in Massachusetts for news of independence while her husband, John Adams, attended the Second Continental Congress in Philadelphia.<sup>1</sup> As her husband's closest friend and advisor, Mrs. Adams frequently communicated to Mr. Adams by letter.<sup>2</sup> In one of their many correspondences, dated March 31, 1776, Abigail revealed herself to be a woman ahead of her time when she wrote these words to her husband:

I long to hear that you have declared an independency—and by the way in the New Code of Laws which I suppose it will be necessary for you to make I desire you would Remember the Ladies, and be more generous and favourable to them than your ancestors. Do not put such unlimited power into the hands of the Husbands. Remember all Men would be tyrants if they could.<sup>3</sup>

John Adams and the other Founding Fathers of the United States did not heed Abigail's words while drafting the Declaration of Independence nor the Constitution. Now, nearly 250 years later, the United

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1. See *John Adams, Architect of American Government*, COMMONWEALTH OF MASS., <https://www.mass.gov/guides/john-adams-architect-of-american-government/#-john-adams-> (last visited Nov. 6, 2023).

2. See *id.*

3. Letter from Abigail Adams to John Adams (Mar. 31, 1776), in *MY DEAREST FRIEND: LETTERS OF ABIGAIL AND JOHN ADAMS* 110 (Margaret A. Hogan & C. James Taylor eds., 2007) [hereinafter Letter from Abigail Adams].

States has an opportunity to correct its record on gender equality, fund what it claims are its priorities, and “Remember the Ladies” by encouraging and supporting Ukraine’s inclusion of women and their unique perspectives in repelling and recovering from an unprovoked invasion directed by one of the world’s most vicious tyrants, Vladimir Putin.<sup>4</sup> By proactively placing women at the peace negotiation table and in the post-reconstruction government, Ukraine stands a stronger chance of achieving an enduring peace as well as the political and economic stability it seeks so that it can join the European Union and the North Atlantic Treaty Organization (NATO).<sup>5</sup>

The United States has national and global security goals that aim to improve the number and contributions of women as meaningful members of peace processes, prioritized strategies and detailed action plans, and even domestic legislation that directs activities toward these goals. It has the tools it needs to lead the globe in improving the lives of women while achieving its security goals by encouraging and assisting Ukraine and its women—it has just failed to use them. With funding and political will to implement its women, peace, and security plan, the United States can advance the prospect of achieving an enduring peace and successful reconstruction in Ukraine.

Part I of this Note is an overview of United States national security, including the National Security Strategy and both overarching and specific national security goals related to Russia and Ukraine. Part II contains a summary of the United Nations Resolutions and United States commitments and action plans to improve the lives of women and girls globally, and provides detailed information regarding Women, Peace, and Security, including the Women, Peace, and Security Act of 2017. Part III is a short overview of the situation in Ukraine, including the status of Ukrainian women, and contains a snapshot of United States assistance to Ukraine to combat Russian aggression. Part IV makes the case that the situation in Ukraine provides the United States with an opportunity to advance its national security goals by funding and leveraging the Women, Peace, and Security Act to increase women’s participation in the peacemaking process in Ukraine. Part V highlights why the inclusion of women in peace processes is important, including the results of empirical studies that demonstrate improved chances of securing peace when women meaningfully

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4. See Max Boot, *Putin Finally Learns the Lesson all Tyrants Learn*, WASH. POST (June 24, 2023, 3:27 PM), <https://www.washingtonpost.com/opinions/2023/06/24/putin-wagner-rebellion-ukraine-war/>.

5. See discussion *infra* Part V.

participate in peace processes, and that an enduring peace will result in a more stable country post-conflict.

## I. OVERVIEW OF UNITED STATES NATIONAL SECURITY GOALS

### A. *National Security Strategy*

The United States National Security Strategy is a report mandated by Section 603 of the Goldwater-Nichols Department of Defense Reorganization Act of 1986 (Public Law 99-433).<sup>6</sup> Each year, the President submits his National Security Strategy (NSS) to Congress on the date that he submits his budget for the next fiscal year, and the Department of Defense (DOD) adjusts its operational planning accordingly to meet the Commander in Chief's goals and priorities.<sup>7</sup> The 2022 NSS highlights the Biden-Harris administration's overarching and region-specific national security goals. These goals include achieving the administration's vision for "a world that is free, open, secure, and prosperous."<sup>8</sup>

The administration asserts that the United States must "proactively shape the international order in line with our interests and values."<sup>9</sup> Further, the United States believes that global alliances are the country's most strategic asset and are essential to maintaining international peace and stability.<sup>10</sup> The NSS also states that the United States "will pursue an affirmative agenda to advance peace and security and to promote prosperity in every region" of the world.<sup>11</sup> The Biden administration believes the most pressing challenge facing the United States' vision for a free, open, and prosperous world is from authoritarian powers whose behavior poses an immediate threat to international peace and stability, namely the People's Republic of China and Russia.<sup>12</sup>

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6. Goldwater-Nichols Department of Defense Reorganization Act of 1986, Pub. L. No. 99-433, § 603, 100 Stat. 992, 1074-75 (codified as amended at 50 U.S.C. § 3043).

7. *Id.* § 3043(a)(2).

8. THE WHITE HOUSE, NATIONAL SECURITY STRATEGY 6 (2022) [hereinafter NATIONAL SECURITY STRATEGY].

9. *Id.* at 11.

10. *See id.*

11. *Id.* at 12.

12. *See id.* at 8.

*B. National Security Goals Regarding Russia and Ukraine*

Constraining Russia is a global United States priority, as the administration believes that Russia poses an immediate and persistent threat to international peace and stability due to its choice over the last decade of pursuing an imperialist foreign policy to overturn strategic elements of the world order.<sup>13</sup> It aims to constrain Russia's strategic economic sectors and counter its attempts to weaken and destabilize sovereign governments and undermine multilateral organizations.<sup>14</sup> The United States will build and deepen a coalition of allies to prevent Russia from inflicting further harm to European security and democracy.<sup>15</sup>

The NSS acknowledges the Russian invasion of Ukraine and recognizes that the United States has already provided humanitarian, economic, and development assistance to strengthen Ukrainian sovereignty and to help the millions of Ukrainian refugees, who fled the invasion.<sup>16</sup> The United States pledges to continue to stand with the Ukrainian people as they fight Russian aggression and to rally the world to hold Russia accountable for the atrocities it has committed in Ukraine.<sup>17</sup> In addition to supporting Ukraine in its fight for freedom, the United States will help it recover financially and regionally integrate into the European Union.<sup>18</sup> The United States is determined to impose severe costs on Moscow for Russian aggression in Ukraine and has joined other partners and allies to manage the refugee crisis caused by the invasion.<sup>19</sup>

## II. U.S. GLOBAL COMMITMENTS

*A. Participation in and Commitments to the United Nations*

The United Nations (U.N.) was created on October 24, 1945.<sup>20</sup> The United States is the single largest financial contributor to the U.N. and the U.S. Fiscal Year 2023 budget request included nearly \$4.5 billion for

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13. See NATIONAL SECURITY STRATEGY, *supra* note 8, at 23, 25.

14. See *id.* at 26.

15. See *id.*

16. See *id.*

17. See *id.*

18. See NATIONAL SECURITY STRATEGY, *supra* note 8, at 26.

19. See *id.* at 39.

20. See *History of the United Nations*, UNITED NATIONS, <https://www.un.org/en/about-us/history-of-the-un> (last visited Jan. 31, 2023).

U.N. activities.<sup>21</sup> The United States participates in U.N. programs as diverse as peacekeeping initiatives, humanitarian response and development, as well as empowerment of women and girls.<sup>22</sup>

Concerning the empowerment of women and girls, the United States supports U.N. programs aimed at improving gender equality globally, ending gender-based violence, improving girls' education, and strengthening women's economic empowerment, amongst others.<sup>23</sup> Successive presidential administrations have supported various global women's issues, most recently with Presidents Obama, Trump, and Biden all issuing executive orders or signing legislation related to global programs for women and girls.<sup>24</sup> The State Department and United States Agency for International Development (USAID) track some gender programming, but perhaps revealingly, the United States government does not comprehensively monitor spending for specific women's issues.<sup>25</sup> The 2022 Congressional budget funding for select programs was approximately \$1.6 billion, including \$200 million for women's economic empowerment, \$150 million for girls' education in conflict areas, as well as \$890 million for improving women's health globally.<sup>26</sup>

### *B. Commitment to Women, Peace, and Security*

Over the last twenty years, members of Congress and the Executive Branch have increasingly recognized a growing body of research linking gender equality to increased societal stability, prosperity, and security.<sup>27</sup> This recognition prompted the United States to support the adoption of U.N. Security Council Resolution (UNSCR) 1325 in October 2000, in which the Security Council endorsed a series of actions related to Women, Peace, and Security.<sup>28</sup> UNSCR 1325 was considered a landmark resolution that recognized the gender dimension of conflict and the disproportionate impact of conflict on women and girls, as well as the contributions

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21. See LUISA BLANCHFIELD, CONG. RSCH. SERV., IF10354, UNITED NATIONS ISSUES: U.S. FUNDING TO THE U.N. SYSTEM 2 (2022).

22. See U.S. DEP'T OF STATE, REPORT TO CONGRESS ON UNITED STATES PARTICIPATION IN THE UNITED NATIONS IN 2021 22 USC 287B(A): REPORTS TO CONGRESS BY THE PRESIDENT 2, 12 (2021); see *id.* for an overview of United States participation in United Nations activities.

23. See LUISA BLANCHFIELD ET AL., CONG. RSCH. SERV., IF11804, GLOBAL WOMEN'S ISSUES: BACKGROUND AND SELECTED U.S. EFFORTS 2 (2022).

24. See *id.*

25. See *id.*

26. See *id.*

27. See *id.* at 1.

28. See S.C. Res. 1325, ¶ 1 (Oct. 31, 2000); see also C. Cora True-Frost, *The Security Council and Norm Consumption*, 40 N.Y.U. J. INT'L L. & POL. 115, 158 (2007).

women have made to resolving conflict and peacemaking.<sup>29</sup> UNSCR 1325 was an ambitious document that reaffirmed the important role that women play in the prevention and resolution of conflicts and in peacemaking.<sup>30</sup> Amongst its wide range of recommendations and commitments, UNSCR 1325 specifically urged member states to increase women's representation at "all decision-making levels in national, regional and international institutions and mechanisms for the prevention, management and resolution of conflict."<sup>31</sup>

Importantly, it called on all parties involved in armed conflict to take special measures to protect women and girls from gender-based violence, particularly rape and other forms of sexual abuse and all other forms of violence that can occur during armed conflict.<sup>32</sup> It urged member states to increase their voluntary financial, technical, and logistical support for all relevant programs.<sup>33</sup> In the twenty-three years since UNSCR 1325, nine additional resolutions have been adopted to further strengthen the WPS global agenda.<sup>34</sup> To date, 104 U.N. member countries have developed National Action Plans (NAPs) for executing their WPS commitments, including Ukraine in 2016.<sup>35</sup> NAPs are currently considered the most concrete mechanisms for implementing UNSCR 1325.<sup>36</sup> Not surprisingly, despite being a permanent member of the U.N. Security Council, the Russian Federation has not developed its own NAP.<sup>37</sup>

For its part, the United States has taken a series of affirmative steps to reinforce its support of and commitment to the Women, Peace, and

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29. See GLOB. NETWORK OF WOMEN PEACEBUILDERS & CORDAID, FINANCING FOR THE IMPLEMENTATION OF NATIONAL ACTION PLANS ON UN SECURITY COUNCIL RESOLUTION 1325: CRITICAL FOR ADVANCING WOMEN'S HUMAN RIGHTS, PEACE AND SECURITY 1 (2014); THE WHITE HOUSE, THE UNITED STATES NATIONAL ACTION PLAN ON WOMEN, PEACE, AND SECURITY 6 (2016) [hereinafter 2016 WPS PLAN]; True-Frost, *supra* note 28 at 158.

30. See generally S.C. Res. 1325, *supra* note 28, ¶ 1 (urging the increased representation of women in conflict resolution).

31. *Id.* ¶ 1.

32. See *id.* ¶ 10.

33. See *id.* ¶ 7.

34. See UN WOMEN, *Global Norms and Standards: Peace and Security*, [https://www.unwomen.org/en/what-we-do/peace-and-security/global-norms-and-standards#\\_WPS\\_resolutions](https://www.unwomen.org/en/what-we-do/peace-and-security/global-norms-and-standards#_WPS_resolutions) (last visited Jan. 31, 2023). Resolution 1325 itself has been incorporated into enforceable country-specific resolutions. See True-Frost, *supra* note 28, at 158–61.

35. See UN WOMEN *supra* note 34; see also *National Action Plans By Region*, WOMEN'S INT'L LEAGUE FOR PEACE AND FREEDOM, <http://1325naps.peace-women.org/index.php/nap-overview/> (last visited Nov. 7, 2023) [hereinafter *National Action Plans*].

36. See GLOB. NETWORK OF WOMEN PEACEBUILDERS & CORDAID, *supra* note 29, at 7.

37. See *National Action Plans*, *supra* note 35.

Security agenda, including President Obama's issuance of Executive Order (EO) 13595 in December 2011.<sup>38</sup> In EO 13595, the President set the U.S. policy recognizing that "promoting women's participation in conflict prevention, management, and resolution, as well as in post-conflict relief and recovery, advances peace, national security, economic and social development, and international cooperation."<sup>39</sup> Further, it established U.S. policy to create its own National Action Plan for the executive branch.<sup>40</sup>

The United States' first NAP was released in December 2011, and made the case for including women in peace and security, highlighting the role women have taken in successful peacemaking in such diverse countries as Northern Ireland, Guatemala, South Africa, and Uganda.<sup>41</sup> The United States employed a whole of government approach to create the NAP and the result was an outcome-based plan covering five high-level objectives: "National Integration and Institutionalization," "Participation in Peace Processes and Decision-Making," "Protection from Violence," "Conflict Prevention," and "Access to Relief and Recovery."<sup>42</sup> Of note, the United States planned to "improve the prospects for inclusive, just, and sustainable peace by promoting and strengthening women's rights and effective leadership and substantive participation in peace processes, conflict prevention, peacebuilding, transitional processes, and decision-making institutions in conflict-affected environments."<sup>43</sup> Realizing the strength of the United States' diplomatic efforts around the world, the United States added the utilization of "public diplomacy and engagement to advocate for women's leadership and participation in security-related processes and decision-making" in later revisions of the NAP.<sup>44</sup>

### *C. Women, Peace, and Security Act of 2017*

The United States further strengthened its global WPS commitments when the 115th Congress passed the Women, Peace, and Security Act of 2017.<sup>45</sup> With the passage of this legislation, the United States became the first nation in the world to pass comprehensive domestic legislation that

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38. See generally Exec. Order No. 13,595, 3 C.F.R. § 321 (2011) (implementing a "National Action Plan on Women, Peace and Security").

39. *Id.* § 1.

40. See *id.* §§ 2–3.

41. See 2016 WPS PLAN, *supra* note 29, at 4.

42. See *id.* at 18.

43. *Id.*

44. *Id.* at 21.

45. See Women, Peace, and Security Act of 2017, 22 U.S.C. § 2152j (2017).



codified its commitments to the principles of the WPS agenda.<sup>46</sup> Within the Act, Congress incorporated several findings to support the legislation:

- (1) Around the world, women remain under-represented in conflict prevention, conflict resolution, and post-conflict peace building efforts.
- (2) Women in conflict-affected regions have achieved significant success in—
  - (A) moderating violent extremism;
  - (B) countering terrorism;
  - (C) resolving disputes through nonviolent mediation and negotiation; and
  - (D) stabilizing societies by enhancing the effectiveness of security services, peacekeeping efforts, institutions, and decisionmaking [sic] processes.
- (3) Research suggests that peace negotiations are more likely to succeed and to result in durable peace agreements when women participate in the peace process.<sup>47</sup>

These findings reiterated those expressed in UNSCR 1325 nearly twenty years earlier.<sup>48</sup> Despite the U.N. and its member countries' considerable efforts over two decades, women remain underrepresented at the negotiation table, yet their presence increases the likelihood of lasting peace. In the Act, Congress clearly expressed its sense that the United States can and should do more in this area: “[T]he United States should be a global leader in promoting the meaningful participation of women in conflict prevention, management, and resolution, and post-conflict relief and recovery efforts.”<sup>49</sup> Congress further proclaimed the policy of the United States shall be “to promote the meaningful participation of women in all aspects of overseas conflict prevention, management, and resolution, and post-conflict relief and recovery efforts, reinforced through diplomatic efforts and programs . . . .”<sup>50</sup>

The Act also required that the President develop and present to Congress a single government-wide strategy with a detailed description as to

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46. See Blake Peterson & Amanda Van Dort, *Marking the One Year Anniversary of the Women, Peace, and Security Act*, DIPNOTE (Oct. 5, 2018), <https://2017-2021.state.gov/markings-the-one-year-anniversary-of-the-women-peace-and-security-act/index.html>.

47. Women, Peace, and Security Act § 2.

48. See generally S.C. Res. 1325, *supra* note 28 (discussing similar themes as to the importance of women in conflict resolution).

49. Women, Peace, and Security Act § 3.

50. *Id.* § 4.

how the United States intends to fulfill Congress's policy objectives contained in the Act.<sup>51</sup> Of note, Congress directed that the strategy be aligned with, and support, plans developed by other countries to improve the participation of women in peace and security processes.<sup>52</sup> This reinforced Congress's sense that the United States should lead the world in this effort. Also included in the Act are specific instructions that the affected executive branch agencies each develop particularized plans for implementing the Act, and that the President consult and coordinate with international partner countries, non-governmental organizations, and other stakeholders to meet Congress's objective of increasing the meaningful participation of women in peacekeeping and peacemaking around the world.<sup>53</sup>

Feminist and international affairs experts were quick to praise Congress for passing this piece of bipartisan legislation during increasingly politically polarized relations.<sup>54</sup> However, some commentators, while hailing the WPS Act as a strong first step and clear signal to women around the globe that their voices were being heard, cautioned that without appropriate funding from Congress, the legislation would not have a substantial impact.<sup>55</sup> Indeed, as groundbreaking and ambitious as the WPS Act was, the Congressional Budget Office (CBO) cost estimate for implementing the legislation bolstered the fear that a lack of funding will thwart success in meeting Congress's goals and objectives.<sup>56</sup> The CBO estimate concluded that the cost of additional WPS efforts and the reporting of agency activities would be less than \$500,000, would be subject to the availability of appropriated funds, and would not increase net government spending.<sup>57</sup> In short, Congress provided no dedicated funding for the affected agencies to implement the legislation. The agencies were and are to use existing funds and agency budgets to lead the world in increasing the participation of women in the WPS space. In the United States, legislation

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51. *Id.* § 5.

52. *Id.*

53. *Id.*

54. See Rachel Vogelstein & Jamille Bigio, *Three Things to Know: The Women, Peace, and Security Act of 2017*, COUNCIL ON FOREIGN RELS. (Oct. 13, 2017, 11:22 AM), <https://www.cfr.org/blog/three-things-know-women-peace-and-security-act-2017>; Allison Peters, *Women, Peace and Security: Trump Can Make Feminist History by Signing This Bill*, USA TODAY (Oct. 3, 2017, 5:13 PM), <https://www.usatoday.com/story/opinion/2017/10/03/women-vital-peace-security-and-stability-allison-peters-column/723706001/>.

55. See Peters, *supra* note 54.

56. See CONG. BUDGET OFF., COST ESTIMATE: H.R. 2484, WOMEN, PEACE, AND SECURITY ACT OF 2017, at 1 (May 30, 2017).

57. See *id.*

that receives dedicated funding receives focus within the government.<sup>58</sup> Legislation without funding is unlikely to rise to the top of an agency's priority list. This lack of focus severely limits an agency's ability and interest in fully implementing the law.

Upon President Trump's signing the WPS Act into law, the executive branch developed and presented to Congress in June 2019 the mandated WPS strategy as instructed in the legislation.<sup>59</sup> For the first time, the United States specifically stated that it would link the WPS strategy with the NSS and other national strategic guidance related to peace and security, noting that "[g]lobal insecurity also affects the national security of the United States, as regions of conflict often provide safe haven for terrorists and other illicit actors; become proxies for broader wars between nation-states; and lead to massive population displacement, migration, and further regional instability."<sup>60</sup>

"The WPS strategy acknowledges a tremendous amount of untapped potential among the world's women and girls to identify, recommend, and implement effective solutions to conflict."<sup>61</sup> It couches its goals and tempers expectations by acknowledging that the United States will not be able to reach all parts of the world with its efforts, but will engage selectively in areas and in ways that promote U.S. national security interests.<sup>62</sup> It includes four lines of effort (LOE) generally aligning with the activities described in the NAP. Each LOE has an overarching goal, a statement of the problem, and a detailed strategy approach that includes various activities which illustrate support for the goals.<sup>63</sup> Highlighted activities include providing "logistical support to female negotiators, mediators, peace-builders, and stakeholders," and "[t]arget[ing] assistance strategically, by identifying a limited set of cases in which United States Government WPS programs have a significant opportunity for measurable impact."<sup>64</sup> In furtherance of the U.S. goal of working in tandem with allied countries, the strategy also includes encouraging partner governments to "adopt plans to

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58. Margot Sanger-Katz & Alicia Parlapiano, *What Would the G.O.P. Plan Actually Do to the Budget?*, N.Y. TIMES (May 8, 2023), <https://www.nytimes.com/interactive/2023/05/08/upshot/federal-budget-republicans.html> (suggesting that favored programs are protected by legislators when it comes to appropriations from the discretionary budget and, consequently, less favored programs are subjected to cuts within the discretionary budget).

59. See EXEC. OFF. OF THE PRESIDENT, UNITED STATES STRATEGY ON WOMEN, PEACE, AND SECURITY 1 (2019) [hereinafter 2019 WPS STRATEGY].

60. *Id.* at 4.

61. *Id.* at 5.

62. See *id.* at 6.

63. See *id.* at 6–14.

64. 2019 WPS STRATEGY, *supra* note 59, at 8, 12.

improve the meaningful participation of women in processes connected to peace and security and decision-making institutions.”<sup>65</sup>

The first two reports to Congress, which summarize and evaluate the implementation of the strategy, indicate that the affected agencies began implementing the strategy with mixed levels of resourcing and activity. Specifically, the Department of State (“State”) and USAID both dedicated more funding to the effort than the DOD over the course of two years, with State reporting a combined total of \$248 million as being earmarked for WPS objectives and USAID reporting \$639 million invested in WPS activities.<sup>66</sup> In contrast, the DOD reported just \$15.5 million being invested in WPS-related programming.<sup>67</sup> Both State and USAID also reported arguably significantly more overall WPS-related activities than DOD.<sup>68</sup>

The DOD’s “reluctance and half-hearted implementation of WPS” was recently noted by Major Kyleigh Cullen.<sup>69</sup> In her commentary, Cullen states that although the highest levels of the U.S. government support the WPS strategy and NAP, that same level of support has not been replicated at the DOD.<sup>70</sup> Cullen points to a lack of explicit support from the Secretary of Defense and the Joint Chiefs of Staff as one reason why the DOD has been slow to embrace WPS but she finds hope in the fact that the WPS agenda seems to be gaining traction at the geographic combatant command level.<sup>71</sup>

While State and USAID, with their worldwide footprints, are, perhaps, in a more obvious position to fully embrace and implement the WPS agenda, Cullen argues that the United States military’s global footprint also “offers an excellent opportunity to promote WPS principles . . . [.]” despite the apparent contradiction of WPS feminist ideals being implemented by a military.<sup>72</sup> The United States military, in its ongoing assistance to Ukraine, is ideally situated to promote WPS and in the process

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65. *Id.* at 13.

66. See THE WHITE HOUSE, UNITED STATES GOVERNMENT WOMEN, PEACE, AND SECURITY CONGRESSIONAL REPORT 1 (2021) [hereinafter 2021 WPS CONGRESSIONAL REPORT]; THE WHITE HOUSE, UNITED STATES GOVERNMENT WOMEN, PEACE, AND SECURITY CONGRESSIONAL REPORT 4–5 (2022) [hereinafter 2022 WPS CONGRESSIONAL REPORT].

67. See 2021 WPS CONGRESSIONAL REPORT, *supra* note 66, at 2; 2022 WPS CONGRESSIONAL REPORT, *supra* note 66, at 5.

68. See 2021 WPS CONGRESSIONAL REPORT, *supra* note 66, at 2; 2022 WPS CONGRESSIONAL REPORT, *supra* note, 66, at 4–5.

69. Kyleigh Cullen, *The Women, Peace, and Security Act: Implementation Strategies for a Modern Department of Defense*, 104 JOINT FORCE Q. 63, 64 (2022).

70. See *id.*

71. See *id.*

72. *Id.*

would improve its own female representation and participation to meet the U.S. goal of modelling appropriate integration of WPS goals.

### III. RUSSIAN INVASION OF UKRAINE

#### *A. Impact on Women and Children*

Russia initially invaded Ukraine and annexed the Crimean Peninsula in 2014, but it was Russia's renewed and expanded invasion which began on February 24, 2022, that caught the world's attention and triggered the current humanitarian and military crisis in Ukraine.<sup>73</sup> The European Union and the United States reacted quickly, simultaneously condemning Russia's unprovoked aggression, initiating sanctions against Russian oligarchs, and rushing aid, both humanitarian and military, to a beleaguered Ukraine.<sup>74</sup> The impact of the invasion was felt immediately as hundreds of thousands of women and children became internally displaced within Ukraine or traveled far from home to seek refuge in nearby countries, while men and women alike took up arms to repel the Russian invasion.<sup>75</sup>

By August 2022, nearly seven million people had become internally displaced persons (IDPs) within Ukraine and another 7.8 million refugees, half of which were estimated to be children, had fled the hostilities in Ukraine for other countries.<sup>76</sup> The United States estimates that an additional 900,000 to 1.6 million people have been forcibly removed to Russia and the U.N. High Commission on Refugees estimates that as many as 2.9 million Ukrainian refugees are residing in Russia and Belarus combined.<sup>77</sup> Civilian deaths and injuries have been substantial, with nearly 17,000 civilian casualties through November 14, 2022.<sup>78</sup>

In addition to the crisis faced by IDPs and Ukrainian refugees outside of Ukraine, the women and children who remain in the country face increasing threats from gender-based violence (GBV) and a generalized lack of security. Many Ukrainians interviewed soon after the invasion

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73. See CARE & UN WOMEN, RAPID GENDER ANALYSIS OF UKRAINE 6 (2022).

74. For detailed discussions regarding U.S. and E.U. responses to the Russian invasion of Ukraine, see generally CHRISTINA L. ARABIA ET AL., CONG. RSCH. SERV., IF12040, U.S. SECURITY ASSISTANCE TO UKRAINE (2022); KRISTIN ARCHICK, CONG. RSCH. SERV., IN11897, RUSSIA'S 2022 INVASION OF UKRAINE: EUROPEAN UNION RESPONSES AND U.S.-EU RELATIONS (2022).

75. See generally CARE & UN WOMEN, *supra* note 73, for a complete analysis of the impact of the Russian invasion on women and men in Ukraine.

76. See RHODA MARGESSON & DEREK E. MIX, CONG. RSCH. SERV., IN11882, HUMANITARIAN AND REFUGEE CRISIS IN UKRAINE 1-2 (2022).

77. See *id.* at 2.

78. See *id.* at 1.

indicated that GBV is a serious concern, and media reports of the rape of Ukrainian women and girls by Russian soldiers have surfaced throughout the war.<sup>79</sup> Unfortunately, although Ukrainian women's leadership has increased in humanitarian efforts at the community level, their participation in and influence on formal policymaking has declined since the invasion, due in large part to the centralization of power and the increased role of the military in decision-making processes.<sup>80</sup> A representative of a women's community service organization described the situation this way: "The decision-making process has changed. Leading positions are held exclusively by men, as a requirement of wartime, and [the process] here is not very democratic. Instead, many issues are resolved via directives."<sup>81</sup>

This decline has occurred even though Ukraine itself adopted UNSCR 1325 and the WPS objectives, drafting its own NAP in 2016 and revising it in 2020.<sup>82</sup> The 2020 NAP was even developed because the previous plan did "not provide solutions to existing and emerging challenges and problems connected with the continuation of the armed aggression of the Russian Federation against Ukraine . . . ."<sup>83</sup> Ukraine clearly knows that countering Russia requires leveraging its women. In its NAP, Ukraine's government acknowledges that "[e]ffective measures must be taken to ensure women's participation in peace processes and post-conflict recovery, protection of victims of armed conflict, prevention and counteraction to gender-based and conflict-related sexual violence with consideration to the needs and interests of women and men during post-conflict recovery."<sup>84</sup> Its detailed action plan lists strategic goal number one as ensuring equal participation of women and men in decision-making related to conflict prevention and resolution, and post-conflict recovery.<sup>85</sup> However, despite women comprising nearly a quarter of the Cabinet of Ministers of Ukraine, it now seems that the exigencies of the continued war with

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79. See CARE & UN WOMEN, *supra* note 73, at 38; Yogita Limaye, *Ukraine Conflict: 'Russian Soldiers Raped Me and Killed my Husband'*, BBC (Apr. 11, 2022), <https://www.bbc.com/news/world-europe-61071243>; Philip Wang et al., *Russia Using Rape as 'Military Strategy' in Ukraine: UN Envoy*, CNN (Oct. 15, 2022, 2:35 AM), <https://www.cnn.com/2022/10/15/europe/russia-ukraine-rape-sexual-violence-military-intl-hnk/index.html>.

80. See CARE & UN WOMEN, *supra* note 73, at 45–46.

81. *Id.* at 46.

82. See CABINET OF MINISTERS OF UKR., NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF UN SECURITY COUNCIL RESOLUTION 1325 ON WOMEN, PEACE, SECURITY UNTIL 2025, at 1 (2020).

83. *Id.* at 2.

84. *Id.* at 2–3.

85. See *id.* at 7.

Russia have resulted in Ukraine's WPS goals taking a decided backseat to military priorities.<sup>86</sup>

#### *B. U.S. Assistance to Ukraine*

In response to the humanitarian crisis sparked by the invasion, the United States Congress immediately appropriated nearly \$8.9 billion in assistance to Ukraine.<sup>87</sup> The amount of aid pledged to Ukraine grows as the war continues, so the exact appropriation is a moving target. One fact is clear, however: although U.S. humanitarian assistance to Ukraine is robust, it is eclipsed by the military aid that the United States has delivered to the country. Since Russia first invaded Ukraine in 2014, the United States has supplied billions in military aid “to help Ukraine preserve its territorial integrity, secure its borders, and improve interoperability with [the North Atlantic Treaty Organization (NATO)].”<sup>88</sup> According to the Council of Foreign Relations, as of May 31, 2023, the United States had appropriated \$76.8 billion in total aid to Ukraine, \$46.6 billion of which is designated as military aid.<sup>89</sup> The remainder was earmarked for humanitarian aid and direct aid to the Ukrainian government.<sup>90</sup> Unfortunately, no funds were earmarked for WPS.

#### IV. LEVERAGING WOMEN, PEACE, & SECURITY IN UKRAINE

The United States has employed a multi-pronged foreign policy strategy to assist Ukraine, counter Russian aggression in the region, and reinvigorate NATO alliances, but more can be done. Namely, what has been missing to date is employment of the Women, Peace, and Security Act and the accompanying strategy and action plan. A survey of the current literature reveals no mention of utilizing and supporting WPS ideals in relation to the current situation in Ukraine, yet the U.N., United States, and Ukraine all acknowledge that including women in decision-making and peacemaking processes offers a real opportunity to broker a more lasting peace to the conflict in Ukraine.<sup>91</sup>

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86. See *Cabinet of Ministers of Ukraine*, GOV'T PORTAL OFF. WEBSITE, <https://www.kmu.gov.ua/en/team> (last visited Jan. 19, 2023).

87. See MARGESSON & MIX, *supra* note 76, at 1.

88. ARABIA ET AL., *supra* note 74, at 1.

89. See Johnathan Masters & Will Mellow, *How Much Aid has the U.S. Sent Ukraine? Here are Six Charts*, COUNCIL ON FOREIGN RELS. (Sept. 21, 2023, 9:00 AM), <https://www.cfr.org/article/how-much-aid-has-us-sent-ukraine-here-are-six-charts>.

90. See *id.*

91. See S.C. Res. 1325, *supra* note 28, ¶¶ 1–3; Women, Peace, and Security Act § 2; CABINET OF MINISTERS OF UKR., *supra* note 81, at 1–2.

Cynics would say that the absence of discussion of WPS principles vis-à-vis Ukraine and the Russian invasion means that all the talk of improving security by including women in peace processes is just that—merely talk, and during war time, this cheap talk is replaced by the practicalities of military necessity.<sup>92</sup> The cynics may be correct. The Ukrainian government has an invasion to repel and cannot yet plan for post-conflict reconstruction, never mind think to involve women, including their own cabinet ministers, in the process. This is where the United States can and should step forward and dedicate funding to achieving WPS goals, include women meaningfully in its delegations to Ukraine, and encourage Ukraine to include women and their perspectives in preparations for and implementation of peace processes and post-conflict reconstruction. There are countless successful examples the United States can share with Ukraine in promoting these policies, including in such diverse countries as Pakistan, Colombia, and Sri Lanka.<sup>93</sup>

Making women, peace, and security a priority of U.S. assistance to Ukraine would tap that tremendous potential of women and girls recognized in the WPS strategy, both in the United States and Ukraine. To appropriately model the meaningful participation of women, the United States would need to include accomplished American women as delegation leaders and participants, including military members, humanitarian advisors, and members of Congress. This inclusion of women and their perspectives would also require that the DOD include WPS principles in its interactions with Ukrainian military leaders and would likely require that it increase the number of U.S. women providing military assistance in Ukraine. By encouraging and supporting Ukraine to meaningfully include women in its peacemaking processes and post-conflict reconstruction, those Ukrainian women who so far appear to have been excluded would have a voice and seat at the negotiation table.

Concentrating on women's participation in Ukraine would allow the United States to focus its public diplomacy efforts on WPS activities in an area and in a way that supports its own national and global security goals.<sup>94</sup> It would also meet the U.S. goal of focusing its efforts in areas

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92. See Cathy Russell, *What's the Problem with Women, Peace, and Security?*, COUNCIL ON FOREIGN RELS. (Oct. 26, 2015, 11:30 AM), <https://www.cfr.org/blog/whats-problem-women-peace-and-security>.

93. See 2021 WPS CONGRESSIONAL REPORT, *supra* note 66 at 7, 11, 12.

94. See NATIONAL SECURITY STRATEGY, *supra* note 7, at 16-17, 35, 46; 2019 WPS STRATEGY, *supra* note 58, at 18-30 (detailing specific U.S. national and global security goals); see also Anthony Navone, *Toward a Gender-Inclusive National Security Strategy*, U.S. INST. OF PEACE, (Mar. 30, 2021) (“WPS strategies offer an opportunity to improve our national security apparatus from within.”),



where it can have a significant opportunity to make a lasting impact. Lastly, prioritizing WPS assistance to Ukraine supports the desire of Congress for the United States to be a world leader in this area, and it is completely aligned with the lines of effort and overarching goals included in both the WPS strategy and the NAP.

An unanswered question is just exactly how much money the United States should devote to funding WPS efforts in Ukraine. While a detailed answer to that question is beyond the scope of this Note, considering the fact that the WPS Act has never had dedicated funding and the implementing agencies have had to utilize funds from their existing budgets, even a relatively modest amount of capital may have a considerable impact. With \$76.8 billion in aid to Ukraine so far, just one percent of that total amount is a sizeable sum focused on one goal.<sup>95</sup> This comparatively minor adjustment of focus may very well allow the United States to work much smarter in Ukraine by countering brute Russian military aggression with not only its own military might, but with diplomatic finesse as well.

#### V. WHY WOMEN'S PARTICIPATION IN PEACE & SECURITY MATTERS

Critics of this argument may assert that the United States is doing exactly what it needs to do by focusing on military and humanitarian aid to Ukraine, tried and true methods of assisting another country. They may also counter that striving to implement feminist notions of women's empowerment is a "waste" of money, no matter that the United States and over 100 other nations have committed to doing so.<sup>96</sup> Lastly, they may argue that the United States should not fund any aid to Ukraine, including a peacemaking project.<sup>97</sup>

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<https://www.usip.org/publications/2021/03/toward-gender-inclusive-national-security-strategy>.

95. See Masters & Merrow, *supra* note 89.

96. See *National Action Plans*, *supra* note 35.

97. Indeed, some critics argue that the United States should not provide any aid to Ukraine due to the current fiscal challenges in the United States, as well as Ukraine's ongoing corruption challenges. See William A. Galston, *Republicans are Turning Against Aid to Ukraine*, BROOKINGS (Aug. 8, 2023), <https://www.brookings.edu/articles/republicans-are-turning-against-aid-to-ukraine/>; Andrew E. Kramer, *'Where is the Money?' Military Graft Becomes a Headache for Ukraine*, N.Y. TIMES (Sept. 4, 2023), <https://www.nytimes.com/2023/09/04/world/europe/ukraine-military-spending-corruption.html>; Catie Edmondson, *Why the Once-Hawkish Heritage Foundation Opposed Aid to Ukraine*, N.Y. TIMES (May 27, 2022), <https://www.nytimes.com/2022/05/27/us/politics/ukraine-aid-heritage-foundation.html>.

However, the stakes are so high that the United States cannot afford *not* to undertake this effort.<sup>98</sup> The benefits of including women in peace negotiation processes and post-conflict reconstruction are numerous, well documented, and will improve Ukraine's stability, reputation, and governance post-conflict. This is good for Ukraine, the United States, and the world.

First, despite a dearth of data with which to work, the results of empirical studies of women's participation in peace processes are clear: the inclusion of women as meaningful participants and signatories in peace negotiations results in a better chance of peace, a more durable peace, and a peace accord with higher implementation rates than when they do not participate.<sup>99</sup> In fact, one quantitative study of women in peace processes found the inclusion of women as participants, signatories, mediators, etc., results in a thirty-five percent increase in the probability that a peace will endure fifteen years.<sup>100</sup>

Regarding the meaningful participation of women, Marie O'Reilly conducted deeper analysis comparing two peace processes in the Philippines that included women.<sup>101</sup> Over the course of a peace negotiation between the Philippine government and the Moro Islamic Liberation Front, there was an increasing number of women for both sides sitting directly at the negotiating table, comprising and leading the bodies supporting the process such as the secretariat, the legal panel, and the technical working groups.<sup>102</sup> However, another peace process between the Philippine government and the National Democratic Front that included the highest percentage of female delegates across major peace processes between 1992 and 2011, stalled and no further discussions have taken place since the parties signed a joint statement in 2011.<sup>103</sup>

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98. See Michael McFaul, *The Case for Supporting Ukraine is Crystal Clear: Note to Congress: Ukraine Aid is Not Charity But Serves Critical U.S. Interest*, FOREIGN POL'Y (Nov. 16, 2023, 4:39 AM) (discussing why aiding Ukraine to a victory over Russia advances "core U.S. interests"), <https://foreignpolicy-com.libezproxy2.syr.edu/2023/11/16/ukraine-russia-war-us-congress-aid-weapons/>.

99. See Jana Krause et al., *Women's Participation in Peace Negotiations and the Durability of Peace*, 44 INT'L INTERACTIONS 985 (2018) for detailed analyses of recent studies regarding women's involvement in peace processes. See generally MARIE O'REILLY ET AL., INT'L PEACE INST., REIMAGINING PEACEMAKING: WOMEN'S ROLES IN PEACE PROCESSES (2015) (describing better outcomes in peace making processes when women actively participate).

100. See LAUREL STONE, INT'L PEACE INST., QUANTITATIVE ANALYSIS OF WOMEN'S PARTICIPATION IN PEACE PROCESSES, in REIMAGINING PEACEMAKING: WOMEN'S ROLES IN PEACE PROCESSES annex II at 34 (2015).

101. See O'REILLY ET AL., *supra* note 99, at 19–26.

102. See *id.* at 21–22.

103. See *id.* at 20.

The research was able to discern the specific difference between the two processes: in the first negotiation, the women representing both sides were either selected for their past work promoting peace, their expertise in negotiation, or in representing significant constituencies.<sup>104</sup> In the second, the female delegates for the National Democratic Front were the wives of the male negotiators, which the scholars assess likely compromised their meaningful input into the peace process.<sup>105</sup> In sum, as highlighted in a 2016 UN Women report, to improve the chances for peace, you cannot simply count the number of women at the negotiating table, you have to make the women who are there count.<sup>106</sup> Women cannot merely be present when negotiations take place, they must be authorized and supported in meaningfully participating.<sup>107</sup> This is where the encouragement, reinforcement, and support of the United States for Ukraine to authorize the full participation of women at the negotiation table can have good effect.

Considering that other studies have shown that when women did not participate “nearly half of the conflict resolution agreements forged during the 1990s failed within five years,” deciding to invest in the meaningful inclusion of women in the peacemaking process seems like a very simple step to take.<sup>108</sup> This is especially so since a U.N. study also found that the inclusion of women does not weaken peace processes, but can strengthen the influence of other actors at the table.<sup>109</sup> Working in favor of Ukrainian women’s inclusion in future peace negotiations is the fact that Ukraine has previously committed to WPS principles.<sup>110</sup> Such a prior commitment has been found to be a strong factor in determining meaningful involvement in peace processes by women’s groups.<sup>111</sup> The earlier the involvement of women the better. The U.N. found that participation of women during the pre-negotiation and negotiation phases continued into the implementation and post-conflict phases.<sup>112</sup> The time for the United States to act in

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104. *See id.* at 22.

105. *See id.* at 20.

106. *See* THANIA PAFFENHOLZ ET AL., UN WOMEN, MAKING WOMEN COUNT—NOT JUST COUNTING WOMEN: ASSESSING WOMEN’S INCLUSION AND INFLUENCE ON PEACE NEGOTIATIONS 6 (2016).

107. *See id.* at 40, 48.

108. JAMILLE BIGIO & RACHEL VOGELSTEIN, COUNCIL ON FOREIGN RELS., HOW WOMEN’S PARTICIPATION IN CONFLICT PREVENTION AND RESOLUTION ADVANCES U.S. INTERESTS 1 (2016).

109. *See* PAFFENHOLZ ET AL., *supra* note 106, at 6.

110. CABINET OF MINISTERS OF UKR., *supra* note 82, at 1.

111. *See* PAFFENHOLZ ET AL., *supra* note 106, at 54.

112. *See id.* at 6, 47, 55.

support of Ukrainian women and girls is now while the battles are still being waged, not waiting until peace has been negotiated.

Second, by supporting the inclusion of women in peace and security processes in Ukraine, it will likely be a more stable, credible, and trusted post-conflict state because yet another study has found that when peace processes include women, peace is not only more durable, the government's credibility and the public perception of good governance are improved.<sup>113</sup> This same study found that post-conflict legislatures that include women are considered more superior than those that do not, primarily because women influence government social welfare expenditures which improve the lives of all citizens.<sup>114</sup> In fact, the safest and most stable countries in the world are also the most egalitarian.<sup>115</sup> Considering that Ukraine will have significant societal rebuilding with a sizeable corresponding social welfare investment once the war is over, involving more women in its legislature and government processes will not only further burnish its image at home and abroad, but will actually increase its stability and standard of living.<sup>116</sup>

Finally, this perception of good governance will likely assist Ukraine in its oft-repeated goal of joining the European Union (EU) and NATO.<sup>117</sup> Although the EU approved Ukraine to become a candidate for EU membership, there are years of extensive reforms that Ukraine must complete to meet a wide range of EU standards.<sup>118</sup> It must meet several conditions, including having "stable and democratic institutions."<sup>119</sup> Perhaps one of the most important of these reforms is to strengthen its rule of law which

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113. See Sarah Shair-Rosenfield & Reed M. Wood, *Governing Well After War: How Improving Female Representation Prolongs Post-conflict Peace*, 79 THE J. OF POL. 995, 995–96 (2017).

114. See *id.* at 1002–03.

115. See generally WORLD ECON. F., GLOBAL GENDER GAP REPORT 2021: INSIGHT REPORT (2021) (discussing the Global Gender Gap Index which benchmarks gender gaps among four categories: Economic Participation and Opportunity, Educational Attainment, Health and Survival, and Political Empowerment).

116. See Matthew Nitch Smith, *These Countries Have the Highest Quality of Life*, WORLD ECON. F. & BUS. INSIDER (July 1, 2016) (including data demonstrating increased stability and higher standards of living in countries which have narrowed the gender gap), <https://www.weforum.org/agenda/2016/07/these-countries-have-the-highest-quality-of-life>; See generally *id.*.

117. See Robin Emmott & Max Hunder, *EU Backs Ukraine's Membership Bid to 'Live the European Dream'*, REUTERS (June 17, 2022, 6:43 PM), <https://www.reuters.com/world/europe/europe-steps-up-support-ukraine-russia-presses-offensive-2022-06-17/>.

118. See *id.*

119. Pierre Morcos, *Ukraine's Road to EU Membership*, CTR. FOR STRATEGIC & INT'L STUD. (May 18, 2022), <https://www.csis.org/analysis/ukraines-road-eu-membership>.

has been assessed as “fragile.”<sup>120</sup> Strengthening European perception of Ukraine’s governance can only help it to successfully achieve its dreams of EU membership.

Ukraine’s ascension to EU member status with a stable, reformed government and fortified rule of law furthers U.S. goals of forestalling Russian influence in the region because the EU will then have one of its largest member nations right at Russia’s doorstep. NATO membership will likely follow.<sup>121</sup> While joining NATO entails different steps than being granted EU membership, the requirement of having stable, democratic government processes which meet high member standards is common to both organizations.<sup>122</sup> The steps that Ukraine takes to strengthen its governance and rule of law may translate into more quickly meeting NATO’s requirements without risking a degradation of the alliance as a whole.<sup>123</sup> A strong, expanded NATO is in the world’s best interest and one that directly supports U.S. global goals.

#### CONCLUSION

The United States has national and global security goals the funding of which make up the bulk of U.S. government spending. The U.S. government spends hundreds of billions of dollars each year to advance these goals<sup>124</sup> and has already spent billions in aid to Ukraine to repel the Russian invasion.<sup>125</sup> The United States also professes to support UNSCR

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120. *Id.*

121. See *NATO Commits to Future Ukraine Membership, Drums Up Aid*, HUFFPOST (Nov. 29, 2022, 4:47 AM), [https://www.huffpost.com/entry/nato-meets-ukraine-blinken\\_n\\_6385d086e4b0e4c7759663f6](https://www.huffpost.com/entry/nato-meets-ukraine-blinken_n_6385d086e4b0e4c7759663f6).

122. See JAMES CARAFANO, HERITAGE FOUND., *FACTORS AFFECTING UKRAINE’S ACCESSION TO NATO MEMBERSHIP 2* (2022); see also *Enlargement and Article 10*, NATO (AUG. 3, 2023 12:08 PM) (highlighting a 1995 study that shows how NATO enlargement can improve stability and security for member nations by “encouraging and supporting democratic reforms, including the establishment of civilian and democratic control over military forces; fostering patterns and habits of cooperation, consultation and consensus-building characteristic of relations among members of the Alliance; and promoting good-neighbourly relations.”), [https://www.nato.int/cps/en/natolive/topics\\_49212.htm](https://www.nato.int/cps/en/natolive/topics_49212.htm).

123. See NATO, *supra* note 122; see also Sarakshi Rai, *How Does a Country Become Part of Nato?*, THE HILL (May 19, 2022, 12:09 PM), <https://thehill.com/policy/international/3494436-how-does-a-country-become-part-of-nato/>.

124. See CONG. BUDGET OFFICE, *THE FEDERAL BUDGET IN FISCAL YEAR 2022 1* (2022) (reflecting \$751B defense budget representing 3.0% of U.S. Gross Domestic Product in 2022), <https://www.cbo.gov/publication/58888>; see also PETER G. PETERSON FOUND., *THE FACTS ABOUT U.S. DEFENSE SPENDING* (2022), <https://www.pgpf.org/infographic/infographic-the-facts-about-us-defense-spending>; Masters & Merrow, *supra* note 89.

125. See *supra*, Part III.B.

1325 and the proactive inclusion of women in peace and security processes worldwide at the international and domestic levels.<sup>126</sup> It has strategies, action plans, domestic legislation, and reporting requirements, all of which are aligned with its national security goals and objectives.<sup>127</sup> However, it has failed to dedicate any funding to implement its WPS strategy or even comprehensively track spending in this area. Further, the United States fails to recognize the intersection between aid and support to Ukraine and its stated support for women, peace, and security. This disconnect leaves one wondering if the United States is serious in achieving any of its WPS goals.

The United States can further its own national security and help Ukraine in its fight for total independence by strategically and specifically partnering with Ukraine to improve the number of women involved in peacemaking and post-conflict reconstruction efforts. It need only heed Abigail Adams's warning that "men would be tyrants if they could," as evidenced by Vladimir Putin's naked aggression.<sup>128</sup> By finally remembering the ladies and encouraging Ukrainian leaders to meaningfully include women in peacemaking processes, the United States could give Ukraine a real fighting chance at lasting peace and membership in the EU and NATO.

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126. *See supra*, Part II.A.

127. *See supra*, Parts I and II.

128. Letter from Abigail Adams, *supra* note 3.