



MATRIMONIAL OFFENCES UNDER THE ALGERIAN
LAW: AN APPRAISAL

BY

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for the degree of Master of Comparative Laws

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ABSTRACT

This study examines the current legal provisions in protecting the matrimonial relationship and restraining the illegal acts and extramarital relationships from each or both spouses in the Algerian Law. The study starts from the regulations of the matrimonial relationship under Islamic Law as it is the main source of the Algerian Family Code. Meanwhile, the study defines and classifies the matrimonial offences in the light of Islamic Law. Furthermore, the study highlights analytically the provisions of the marriage contract and its dissolution within the Algerian Family Code that provides the right for the wife to ask for divorce (*tatlīq*) from the judge in accordance with Article 51. In this respect, many harmful deeds as grounds to ask for divorce (*tatlīq*) can be considered as matrimonial offences in spite of the absence of special provisions for this kind of offences within the Family Code. Actually, in the absence of a particular law whether for the matrimonial offences or the domestic violence, this study has taken by analysis the rules of the Algerian Penal Code to show to what extent the Algerian legislator legally protects the marital relationship. Based on that, the study shows that the present provisions in relation to the matrimonial offences in Algerian Law are inadequate to provide legal protection to the matrimonial relationship as the constituent element of the family which is the main entity of society. Besides, this study also identifies measures in terms of positive efforts in legal reform to improve the current situation.

خلاصة البحث

يهدف هذا البحث من خلال تحليل واستقراء القوانين الحالية في التشريع الجزائري إلى تسليط الضوء على الحماية القانونية التي يكفلها القانون الجزائري للعلاقة الزوجية ضد الأفعال التي تمس بآثار هاته العلاقة وتهدد استقرارها. و إنطلاقا من العرض التحليلي لأحكام الفقه الإسلامي المتعلقة بتنظيم العلاقة الزوجية من خلال أحكام عقد الزواج والآثار التي يربتها بين الزوجين، وكذلك ما يتعلق بمفهوم الجريمة وتقسيماتها في التشريع الجنائي الإسلامي، تسعى الدراسة إلى الوقوف على الجرائم الزوجية في ظل الشريعة الإسلامية من خلال تحديد مفهوم الجريمة الزوجية وأقسامها، خاصة وأن التشريع الجزائري يعتمد على الشريعة الإسلامية كمصدر رسمي يرجع إليه القضاة في كل ما لم يرد فيه نص في قانون الأسرة الجزائري. و من خلال استقراء قواعد قانون الأسرة الجزائري الخاصة بأحكام الزواج وإنحلاله، وقواعد قانون العقوبات المتعلقة بالجنايات والجنح ضد الأسرة والآداب العامة، يتضح غياب مفهوم الجرائم الزوجية في القانون الجزائري بوصفها الأفعال المنهي عنها شرعا فيما يتعلق بآثار عقد الزواج الصحيح بين الزوجين والتي تثبت آثاره كاملة بالدخول. ففي ظل غياب مفهوم الجرائم الزوجية في التشريع الجزائري في كل من قانون الأسرة و قانون العقوبات يخلص البحث إلى حاجة التشريع الجزائري إلى مراجعة وتعديل القوانين الجاري العمل بها أو إصدار تشريعات جديدة لعدم كفاءة وقدرة القواعد الحالية على توفير الحماية القانونية اللازمة للعلاقة الزوجية مما يتهدها من الأفعال التي تمس بآثار عقد الزواج الصحيح بين الزوجين، خاصة وأن الكثير من التشريعات قد خصت لهذا النوع من الأفعال قوانين وأحكام خاصة فيما يعرف بقوانين العنف الأسري التي في أساسها تقوم على حماية الأسرة و أفرادها بوصفها النواة الأساسية في بناء كل مجتمع.

APPROVAL PAGE

I certify that I have supervised and read this study and that in my opinion; it conforms to acceptable standards of scholarly presentation and is fully adequate, in scope and quality, as a thesis in partial fulfilment for the degree of Master of Comparative Laws.

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DECLARATION

I hereby declare that this thesis is the result of my own investigation, except where otherwise stated. I also declare that it has not been previously or concurrently submitted as a whole for any other degrees at IIUM or other institutions.

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**MATRIMONIAL OFFENCES UNDER THE ALGERIAN LAW:
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Affirmed by Smail Akakba

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Dedicated to my role model in life, my Father Abd Elmadjid Akakba, for everything;

And

To the dearest to my heart, my beloved Mother Messouda Akakba

May Allah (SWT) grant mercy and Aljannah for them, Ameen.

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TABLE OF CONTENTS

Abstract	ii
Abstract in Arabic	iii
Approval Page.....	iv
Declaration.....	v
Copyright Page.....	vi
Dedication	vii
Acknowledgements.....	viii
List of Statutes	xii
CHAPTER ONE: INTRODUCTION.....	1
1.0 Background of the Study	1
1.1 Statement of the Problem.....	4
1.2 Significance of the Study.....	4
1.3 Objectives of the Study.....	4
1.4 Research Questions.....	5
1.5 Literature Review	5
1.6 Scope and the Limitation of the Study	14
1.7 Research Methodology	14
CHAPTER TWO: MATRIMONIAL RELATIONSHIP UNDER ISLAMIC LAW	16
2.0 Introduction.....	16
2.1 Definition of Marriage under Islamic Law	16
2.2 Conditions of Marriage under Islamic Law.....	17
2.2.1 The consent of both husband and wife.....	17
2.2.2 Terms of validity of the marriage	19
2.2.2.1 The guardian (walī)	19
2.2.2.2 The two witnesses.....	20
2.2.2.3 The dower	21
2.3 The Effects of a Valid Matrimonial Contract.....	22
2.3.1 The common rights between spouses.....	22
2.3.1.1 The entitlement of the spouses to enjoy each other	22
2.3.1.2 Good treatment and gregariousness with virtue	23
2.3.1.3 Sanctity of marriage.....	23
2.3.1.4 Inheritance between spouses	23
2.3.1.5 Certainty of the child’s lineage.....	24
2.3.2 The rights of the husband over the wife.....	24
2.3.2.1 The right of guardianship and obedience	24
2.3.2.2 The right of settlement in the marital home	30
2.3.3 The rights of the wife over the husband.....	31
2.3.3.1 The right of women in dower	32
2.3.3.2 The right of maintenance to the wife.....	34
2.3.3.3 Justice	37

CHAPTER THREE: MATRIMONIAL OFFENCES UNDER ISLAMIC LAW 40

3.0 Introduction..... 40

3.1 The Concept of Offence and Its Sub-Divisions in Islamic Jurisprudence 40

3.1.1 Definition of offence in Islamic Law 40

3.1.2 The types of crimes in Islamic jurisprudence 42

3.1.2.1 Classification according to the punishment..... 43

3.1.2.2 Classification according to the intention 47

3.1.2.3 Classification according to the criminal act 48

3.1.2.4 Classification according to violation of rights..... 48

3.2 Concept of Matrimonial Offence in Islamic Law 51

3.2.1 The definition of marital offence 51

3.3 Types of Matrimonial Offences..... 52

3.3.1 The Common marital offences..... 52

3.3.1.1 Fornication/Adultery 52

3.3.1.2 Divulging the matrimonial secrets..... 59

3.3.2 Matrimonial offences committed by the Wife 61

3.3.2.1 Disobedience of the husband or the wife’s recalcitrance..... 61

3.3.2.2 The disposal of the husband’s money without his permission..... 70

3.3.3 The matrimonial offences committed by the husband 72

3.3.3.1 Failure of the husband from paying the dower..... 72

3.3.3.2 Failing (Abstention) to pay the maintenance..... 76

3.3.3.3 Illegal sexual intercourse with the wife 79

3.3.3.4 Exceeding the permissible in disciplining the disobedient wife..... 82

3.3.3.5 Zihār (legally abstaining from one’s wife) 84

3.3.3.6 Injustice of the husband..... 87

3.3.3.7 Afflicting harm to the wife unjustly 90

3.4 Conclusion 92

CHAPTER FOUR: MATRIMONIAL OFFENCES UNDER ALGERIAN LAW 94

4.0 Introduction..... 94

4.1 Matrimonial Relationship in Algerian Law 95

4.1.1 Marriage contract in the Algerian Law 96

4.1.2 Establishment of marriage contract under Algerian Family Code..... 97

4.1.2.1 Conditions of the validity of marriage under Algerian law 98

4.1.2.2 Registration of marriage contract 102

4.2 Matrimonial Offences in Algerian Family Law 104

4.2.1 The failure of the husband to pay the maintenance 106

4.2.2 Defects that prevent the attainment of the objectives of marriage 109

4.2.3 Abandonment in bed more than four months..... 110

4.2.4 The husband has been sentenced for a crime affecting the honour of the family and impossible to continue cohabitation and marital life.....	111
4.2.5 The absence of the husband for more than a year without an excuse and expense.....	112
4.2.6 Violation of the provisions contained in Article 8.....	114
4.2.7 Committing an obscenity	119
4.2.8 The constant dissension (argument) between spouses (<i>Shiqāq</i>) ...	122
4.2.9 Breach of conditions agreed upon in the marriage contract.....	124
4.2.10 Any other damage or harm (<i>ḍarar</i>) that is recognized under Islamic Law	124
4.3 Matrimonial Offences in the Algerian Penal Code.....	131
4.3.1 Abandonment of the pregnant wife.....	132
4.3.2 Omission of the husband to pay the full amount of the prescribed maintenance	133
4.3.3 Adultery of the spouses.....	135
4.4 Conclusion	142
CHAPTER FIVE: CONCLUSION AND RECOMMENDATIONS	146
5.0 Conclusion	146
5.1 Recommendations.....	150
BIBLIOGRAPHY	152

LIST OF STATUTES

Algerian Constitution

Algerian Family Code: Code No. 84-11 of 9 Ramađan 1404HJ/ 9 June 1984, on the Family Code, as amended and supplemented.

Algerian Penal Code: Ordinance No. 66-156 of 8 June 1966 on the Criminal Code, as amended and supplemented.

Enactment No. 70-20 of the Civil Status in Algeria, dated on 19 November 1979.

Malaysian Islamic Family Law (Federal Territories) Act 1984: Act 303.

Malaysian Penal Code: Act 574 (Incorporating all amendments up to January 2006).

Malaysian Syariah Criminal Offences (Federal Territories) Act 1997: Act 559.

Syrian Law of Personal Status 1953: (Enactment No. 59. Dated on 7/9/1953, contains the Syrian Personal Status Act).

CHAPTER ONE

INTRODUCTION

1.0 BACKGROUND OF THE STUDY

As the bedrock of the society, the family institution is highly valued across cultures, religions, legal systems and most of the International Conventions. Article 58 of the Algerian Constitution, under the Rights and Freedoms' section, provides that the family enjoys the protection of the State and society. In addition, Article 2 of the Algerian Family Code (herein after known as A.F.C) considers the family as the fundamental entity of the society. Article 2 of A.F.C also provides that the family is composed of persons who are attached to each other by conjugal relationship and kinship. Moreover, Article 3 renders the family dependent for its sustainability on correlation, solidarity, sociability, good education, good manners, and the dereliction of the social ills.

To ensure a continued and healthy family relationship, Article 30 of the A.F.C requires that the couple must maintain the conjugal ties and duties. Both are duty-bound to cohabit with kindness, mutual respect, love and compassion.

Given its importance, it is surprising that there is no legal concept of the matrimonial offences in the Algerian law, although such acts are considered in many comparative laws as factors threatening the stability of the family.

As stated in the Oxford Dictionary of Law 7th Edition, a matrimonial offence is misbehavior such as adultery, desertion, or cruelty, by a party to a marriage, and in

most cases proof of the matrimonial offences provides ground for divorce or separation by the Court.¹

The Algerian Family Law has considered many misbehavior acts as grounds for divorce. *Nushūz* (Disobedience) as stated in Article 55 of the A.F.C is one reason for the judge to decree divorce between the couple whoever the doer is.

Meanwhile, Article 53 of the A.F.C has provided for the wife grounds for the application of divorce in front of the judge (*tatlīq*) in the context of the matrimonial relationship as stated in Article 51 of the A.F.C:

- 1- For the failure of the husband to pay the maintenance after the issuance of a verdict that obliges him to do so, except if the wife has known the insolvency of the husband at the time of wedding, and that is considered an offence under the Article 331 of Algerian Penal Code (herein after known as A.P.C), although there is no committal for trial in Family Code to this Article;
- 2- Defects that prevent the attainment of the objectives of marriage;
- 3- Abandonment in bedding over a period of four months;
- 4- That the husband has been sentenced for a crime affecting the honour of the family and it is impossible to continue cohabitation and marital life;
- 5- The absence of the husband for more than a year without an excuse and expense;
- 6- Violation of the provisions contained in Article 8 of the A.F.C;
- 7- Committing an indicated obscenity and there is no interpretation of the kinds of obscenity that can be referred to as grounds for the wife to claim for the dissolution;
- 8- The constant discord (*Shiqāq*) between the spouses;
- 9- Breach of conditions agreed upon in the contract of marriage;
- 10- Any other *darar*² that is recognized under Islamic Law.³

¹ Oxford Dictionary of Law Seventh Edition, ed. Jonathan Law, Elizabeth A. Martin, (Oxford University Press, 2009), 347.

² *Darar* means damage or harm.

³ Article 51, Algerian Family Code.

On the other hand, and within the criminal law, Article 330 of the A.P.C has prescribed a punishment of imprisonment from two (2) months to one (1) year and a fine of 25.000 to 100.00 Algerian Dinar (herein after known as D. A), on the husband who deliberately abandoned his wife for two (2) months or more, knowing that she was pregnant and there is no serious reason for abandoning her. However, the complaint by the abandoned wife can be made only a condition for the pursuit of the accused spouse.

In addition, Article 331 of the A.P.C has preserved the right of maintenance and has criminalized the act of refraining to pay the full amount of maintenance that has been judicially prescribed on the husband although it has been stipulated that such particular conditions for abstaining to pay the maintenance is an offence.

Besides, the A.P.C has stated that adultery (*Zina*) falls under the crimes against the public morals rather than as a marital offence. Moreover, the complaint from the aggrieved spouse in adultery based on Article 339 of the A.P.C is required as the condition to pursue the accused and if the injured spouse has forgiven the accused party, there will be no suit against him/her.

As being discussed above, and in the absence of a legal concept of the matrimonial offences in the Algerian Law, it is obvious that the Family Code and Penal Code in Algerian Law do not provide a sufficient legal protection for the marital relationship.

In comparison with other laws, the Algerian law clearly failed to propose provisions relating to the matrimonial offences that affect the marital relationship. The Algerian family law has only spelled out grounds of divorce and dissolution which include what can be considered under the concept of matrimonial offences such as *Nushūz* and obscenity.

Based on this premise, this study is carried out in details to analyze the current provisions of family and criminal laws in Algeria in relation to matrimonial offences and to propose and suggest for new provisions and regulations on matrimonial offences in the Family Code and Penal Code of Algeria.

1.1 STATEMENT OF THE PROBLEM

The absence of particular rulings in the Family and Penal Codes or a special code for the matrimonial offences or a domestic violence act in Algeria makes the current provisions in Algerian law inadequate and do not properly afford sufficient legal protection to the matrimonial relationship under the Algerian law. Thus, legal measures should be identified in terms of positive efforts in legal reform to improve this current state of affairs.

1.2 SIGNIFICANCE OF THE STUDY

The significance of this research is apparent from the aspect of the proposed amendments of provisions and regulations of the Family Code and Penal Code of Algeria because of the inadequacy of the current provisions to effectively deal with matrimonial offences. It is important to provide sufficient legal measures to protect the marital relationship from the various non-behavioral acts between the spouses that can threaten the stability of the marital relationship as the foundation of the family and society.

1.3 OBJECTIVES OF THE STUDY

- 1- To examine the rulings of the matrimonial relationship within Islamic legal provisions;

- 2- To identify the concept of matrimonial offences in the light of Islamic Law as it is the primary source of the Algerian Family Code;
- 3- To examine and review the existing family and criminal laws in Algeria concerning matrimonial offences;
- 4- To identify and assess the strength and adequacy of the Algerian legislation in relation to matrimonial offences;
- 5- To suggest and propose reforms in the legislation in relation to matrimonial offences.

1.4 RESEARCH QUESTIONS

- 1- How do Islamic legal provisions regulate the matrimonial relationship?
- 2- What is the concept of matrimonial offences in the light of Islamic Law and its relation to the conjugal relationship?
- 3- What are the matrimonial offences in the Algerian law?
- 4- To what extent does the Algerian law provide legal protection for the matrimonial relationship?
- 5- What are the measures that can be proposed in order to strengthen the Algerian law in relation to matrimonial offences?

1.5 LITERATURE REVIEW

As a specific study on the topic of matrimonial offences in Algerian Law, there are not many materials on it. However, as related studies, there are countless books and articles that have taken some aspects of the topic under the study, and can be considered quite handful of literatures. These materials will be reviewed in order to

properly understand and appreciate its significance and they are going to assist the researcher to cover the different parts of his topic.

One of the studies that have a relation with this study is the research of Sadīd Belkhīr in “*Al-Himāya al-Jinā'iya li al-Rābita al-'Usariya fī al-Fiqh al-Islāmi wa al-Qānūn al-Jazā'iri*.”⁴ The author in his study has compared between the Islamic Law and the Algerian Law in the extent of the legal protection which is provided for the family tie. The author started the study by the definition of the different terms that are attached to the topic; family, crime and family law by which the family is regulated and can be founded in the shade of its provisions.⁵ In addition, the study has highlighted the legal importance of the family and the utmost need to legally preserve it.⁶ In the second part of the study, the author has analyzed by comparison between Islamic Law and the Algerian Law the legal protection of the family from the criminal aspect. Indeed, the author has mentioned the offence of adultery, the abstention from performing the matrimonial commitments in the respect of the family as a whole and he did not mention about the term of matrimonial offences as a specific kind of crimes or offences that threaten the family in its basis which is the matrimonial relationship. The study of Belkhīr Sadīd will be one of the main references in the current study as long as it was made in the shade of the Algerian Law.

Similarly, Būziāne Abd al-Bāqī in his research entitled “*Al-Himāya al-Jinā'iya li al-Rābita al-'Usariya fī al-Tashrī' al-Jazā'iri*”⁷ has classified the different harmful deeds that threaten and damage the family as the main entity of society. The author started the study by looking into the offences that affect firstly the foundation of the

⁴ Sadīd Belkhīr, “*Al-Himāya al-Jinā'iya li al-Rābita al-'Usariya fī al-Fiqh al-Islāmi wa al-Qānūn al-Jazā'iri: Dirāsa Muqārana*,” (Master of Philosophy thesis, University of al-Hadj Lakhdar, 2006).

⁵ Ibid., 02-16.

⁶ Ibid., 22-55.

⁷ Būziāne Abd al-Bāqī, “*Al-Himāya al-Jinā'iya li al-Rābita al-'Usariya fī al-Tashrī' al-Jazā'iri*,” (Master of Philosophy thesis, University of Abūbakr Belkād, 2010).

family which are the non-registration of marriage contract, the marriage of the non-adult without the judicial permission or her guardians' consent.⁸ In addition, the author has mentioned the offences which are related to matrimonial commitments which are adultery, omission from the payment of maintenance and leaving the pregnant wife.⁹ Indeed, these offences are the matrimonial offences which the recent study aims to define, classify and evaluate under the Algerian Law. Actually, the study has been made in accordance with the family as a whole and the author did not specifically mention about the matrimonial relationship and the misbehavior acts the affect directly the spouses and damage the legal effects of marriage contract which are criminally considered as the matrimonial offences that is the main subject of the current research.

Mahmūd Ahmed Taha Mahmūd in “*Al-Himāya al-Jināīya li al-’Alāqah al-Zawjiya*”¹⁰ has explained the substantial and procedural protection of the marital relationship through the crimes of the adultery, abandonment of the wife, plurality of the marital relationship and illegal cohabitation. Furthermore, the author has discussed the marital relationship in that aspect as a mitigating circumstance of the penal punishment and how it can also be as a preventive cause of the punishment. On the other hand, the author has discussed the procedural protection of the marital relationship through the criminal suit and the authority of the judge in this kind of issues and the system of proving in the criminal suit that is related to those cases. Although the study omitted to give a definition for the matrimonial offences it can be distinguished that the author has given the interest only to the criminal protection of the marital relationship. Moreover, the study did not highlight such aspects of the

⁸ Ibid., 12-21.

⁹ Ibid., 24-29.

¹⁰ Mahmūd Ahmad Taha Mahmūd, *Al-Himāya al-Jināīya li al-’Alāqah al-Zawjiya: Dirāsa Muqārana*, (Al-Riadh: Nayef Arabic Academic of the Security Sciences, 1st edn., 2002).

family law protection as the main law which regulates the matrimonial relationship, its foundation and its legal effects.

A specific study on the matrimonial infidelity has been conducted by Khāled Abd El-Adīm Abū Ghāba entitled “*Al-Khiyāna al-Zawjiya – Dirāsa Muqārana bayn al-Fiqh al-Islāmī wa al-Qānūn al-Wad’ī*”¹¹ It is a specific study that has taken by comparison the issue of infidelity between spouses as a factor of destructing the family and affects the lineage and the society as a whole, not only the infidelity from the sexual aspect, but also from the aspect of the obedience and the property of the husband as a duty taken upon the wife to be guarded by her. The author has gone through his book in such a level where he suggested many solutions to come out from this dangerous phenomenon that threatens the stability of the main entity in the society, especially from the criminal side where this kind of acts has to be punishable. Although the book is not written according to Algerian law, it can be taken as a reference from the side of comparative legislations which has discussed one of the matrimonial offences. Actually, the author has given a deep and specific study on the matrimonial infidelity in the light of a comparative analysis between the Islamic and the civil law in which he has covered many aspects that are attached to the infidelity, namely sexual, monetary and even from the side of obedience. Certainly, the infidelity is one of the illegal acts that have been considered by many laws to be criminalized in the aim of protecting the family from its negative effects.

Another study which has partial relation with the topic of this research is an article of Abd Elhalīm Ben Mahrī titled “*Jarīmat al-Zinā fī Qānūn al- ‘Ukūbāt al-*

¹¹ Khāled Abd El-Adīm Abū Ghāba, *Al-Khiyāna al-Zawjiya: Dirāsa Muqārana bayn al-Fiqh al-Islāmī wa al-Qānūn al-wad’ī*, (Cairo: Dār Amūn li al-Tibāa, 2006).

Jazā'irī”¹² The author in his study went through the legal rules of the adultery in the Algerian Penal Code to identify the pillars of the adultery as a crime against the family and what are the conditions of the punishment application as the Algerian law required. The author raised many questions especially about the matrimonial relationship and when it can be considered as a factor in the adultery suit in the Algerian law; whether in the time of the adultery act or in the time of the suit starting before the court.

Another specific study on the adultery is the study of al-Sā'id Serdānī in his dissertation of Master of Philosophy under the title of “*Athār Ahkām Jarīmat al-Zinā ala al-Zawāj*”¹³ in which it can be found that the author has made a clear comparison between the provisions of the adultery in Islamic Law and the man-made law, namely, the Algerian Law.¹⁴ However, the author has started the study by the clarification of the position of marriage in Islamic law and man-made law, and the difference between marriage and adultery and how the laws have kept this kind of relationship of marriage and have forbidden the adultery because of its harm on the family and society.¹⁵ In the end of the study, the author has shown the legal effects of the adultery on the matrimonial relationship and its legal conditions to be punished on, whether in Islamic Law or in specifically the Algerian Law.¹⁶ Actually, this study is a specific study that can be taken as a reference related to the adultery as one of the matrimonial offences although the author did not mention about the matrimonial offences and the definition or classification of this kind of offences which damage the family and

¹² Abd Elhalīm Ben Machrī, “Jarīmat al-Zinā fī Qānūn al- 'Ukūbāt al-Jazā'irī”, *Human Sciences Magazine*, vol. 10 (2006): 181-200.

¹³ Al-Sā'id Serdānī, “Athār Ahkām Jarīmat al-Zinā ala al-Zawāj: Dirāsa Tahlīliya Muqārana fī Ḍaw' al-Sharīah al-Islāmiya wa al-Qānūn,” (Master of Philosophy thesis, University of al-Haddj Lakhḍar, 2007).

¹⁴ *Ibid.*, 109-122.

¹⁵ *Ibid.*, 5-60.

¹⁶ *Ibid.*, 125-154.

particularly the matrimonial relationship since the adultery is the most common manifestation of these harmful acts.

A specific study on the abstention or failure from paying the matrimonial maintenance is the research of Turkī ben Abd Allah ben Sád al-Shabanāt under the title of “*Al-Siyāsa al-Jināīya li Muwājahat al-Imtinā an Daf al-Nafaqa al-Zawjiya*”¹⁷ in which the author has obviously indicated the criminal extent of breaching one of the legal effects of the marriage contract by the husband. The author has started his thesis by the explanation of the regulations of maintenance in Islamic law as a duty of the husband based on the marriage contract.¹⁸ The study has compared between Islamic law and the man-made law in the respect of criminalizing the act of omission from paying the maintenance and the effects and punishment of this kind of acts.¹⁹ In the end of the study, the author has suggested the means by which maintenance can be preserved and how the husband can be prevented from the abstention of paying the maintenance as an ascertained right of the wife. Indeed, the study of Turkī ben Abd Allah will be a dependable source in the recent study concerning the matrimonial offences that committed by the husband although the study did not define or classify this act under what is going to be termed in the current research as the matrimonial offences.

Ouādī Imād Eddīne in his article “*Al-Jarāim al-Khāsa bi al-Nisā fī al-Tashrī al-Jināi al-Jazāiri*”²⁰ has analyzed the Penal Code articles concerning the offences that can be committed by the women in the respect of the family and the matrimonial relationship and the only offence that can be taken as a matrimonial offence as the

¹⁷ Turkī ben Abd Allah ben Sád al-Shabanāt, “*Al-Siyāsa al-Jināīya li Muwājahat al-Imtinā an Daf al-Nafaqa al-Zawjiya*,” (Master of Philosophy thesis, University of Nayef of the Security Sciences, 2009).

¹⁸ *Ibid.*, 21-68.

¹⁹ *Ibid.*, 69-91.

²⁰ Ouādī Imād Eddīne, “*Al-Jarāim al-Khāsa bi al-Nisā fī al-Tashrī al-Jināi al-Jazāiri*”, *Hawliyat Jāmi'at al-Jazāir*, no. 23 (June 2013): 173-204.

topic of the current research is the adultery. The author has analyzed the provisions of the adultery offence starting from the elements and the conditions of this offence to the prescribed punishment of this offence from the Article 339 to Article 341 of A.P.C.²¹ Indeed, the study is a source for the researcher from the aspect of the adultery's provisions in the A.P.C as a matrimonial offence that can be committed by each or both spouses although the author has made it under the offences of the woman in the shade of Algerian Legislation.

As general study on the Algerian Family Law, Ahmad Nasr al-Gendīn "*Sharh Qānūn al-'Usra al-Jazā'irī*"²² like many books on the interpretation of the Algerian family law, explained through many chapters about the contract of the marriage, its conditions, reasons and procedures of the marriage dissolution, and the familial relationships and the legal impacts of those relationships and all that under the rules of Algerian family law. Generally, the author has covered the rulings of the family in the Algerian family law through his interpretation of the family law rules, but it can be seen that the author did not take by a specific study the marital relationship and its legal protection whether in family law or other laws.

As a specific study on the matrimonial rights in the Algerian Law, Ben IshūshFatīma in his research of "*Al-Huqūq al-Zawjiya bayn Ahkām Tashrī al-'Usra wa al-Ijtihād al-Qaḍā'i*"²³ has made a detailed analysis for the provisions of Islamic Law and Algerian Family Code concerning the matrimonial rights as the effects of the valid marriage. Indeed, the author has started the research on the monetary rights

²¹ Ibid., 190- 198.

²² Ahmad Nasr al-Gendī, *Sharh Qānūn al-'Usra al-Jazā'irī*, (Cairo, Dār al- Kutub al-Qānūniya, Dār Chatāt, 2009).

²³ Ben Ishūsh Fatīma, "*Al-Huqūq al-Zawjiya bayn Ahkām Tashrī al-'Usra wa al-Ijtihād al-Qaḍā'i*", (Master of Philosophy thesis in Law, University of Algiers, 2012).

which are mainly the dower and the maintenance of the wife.²⁴ The second part of the study was made on the non-monetary rights between the spouses starting by the rights of wife and particularly the right of justice especially in the case of polygamy.²⁵ However, the author did not omit to discuss the rights of the husband especially the right to be obeyed by the wife.²⁶ Indeed, the study is a very detailed research concerning the matrimonial rights between the spouses under the Algerian Family Code and in the shade of Islamic Law as the main source of the Family Code. The study will be a dependable source for the researcher in the respect of the legal effects of the marriage contract since the matrimonial offences are the legally forbidden acts that are related the effects of the valid marriage contract.

Nadhīr Su'ād in her study of "*Al-Tatlīq fī Qānūn al-'Usra al-Jazā'iri*"²⁷ has gone by analysis in details on the grounds by which the wife can petition divorce from the judge starting from the ground of breaching the husband of his commitments towards his wife such as paying the maintenance.²⁸ Indeed, the author did not neglect the view of Islamic Law as a factor or ground to be used in the evaluation of the Algerian Law since it is the source of the Family Code in Algeria. The study after the analysis of the provisions of divorce by the request of the wife has mentioned the procedures that have to be followed in front of the judiciary to gain the right in divorce and the compensation because of the damage of these acts that have been taken by the wife as legal ground for asking divorce.²⁹ Actually, the study is fully related to the Algerian law but only from the aspect of the divorce by the request of the wife as a part of the

²⁴ Ibid., 8-56.

²⁵ Ibid., 91-107.

²⁶ Ibid., 131-137.

²⁷ Nadhīr Su'ād, "*Al-Tatlīq fī Qānūn al-'Usra al-Jazā'iri*", (Master thesis, University of Aklī Mhanad 'Ulhāj, 2013).

²⁸ Ibid., 12-16.

²⁹ Ibid., 34-86.