

CONTENTS

Introduction	1
1 Dual Citizenship as a Strategy of Global Upward Mobility	15
2 Serbia: Becoming Hungarian, Returning to Europe	39
3 Mexico: Strategic Birth as Elite Investment	67
4 Israel: European Passports as Insurance and Restitution	97
Conclusion: The Rise of the Sovereign Individual	126
Acknowledgments	145
Methodological Appendix	147
Notes	153
References	175
Index	199

Introduction

For most of the twentieth century, citizenship was an exclusive bond between an individual and a state. Countries refused to share their citizens with other countries just like they do not share their territories. Since the 1990s, the principle of exclusive citizenship has been abandoned, and dozens of countries moved to permit dual citizenship. Today, toleration of multiple citizenship has become the norm, and tens of millions of persons around the world hold citizenship in two—sometimes even three or four—countries.¹

The legitimation and proliferation of multiple citizenships is creating new realities on the ground, reshaping patterns of international migration, political participation, global security, and ethnic relations.² Scholars have analyzed the causes that are driving this global shift, especially the legal and political dynamics behind permissive policy changes. Its consequences, however, remain understudied and undertheorized. The key question that this book aims to answer is: What happens to the institution of citizenship when the basic rules governing it are changed? What does national membership look like in age of flexible, overlapping, and nonterritorial citizenship?

Previous studies mostly examined dual citizenship in the context of immigration to Western Europe and North America. In this book, I focus instead on the strategic acquisition of dual citizenship by nonimmigrants from outside the West.³ Once we shift the empirical focus, a crucial but overlooked aspect comes into sharp relief: the disparity in the value of the “citizenship packages” that different countries offer, and the tremendous practical usefulness that a second citizenship from a more developed country may provide.

Analyzing the rise of dual citizenship through the prism of global inequality highlights a mostly overlooked consequence of this shift: the creation of new opportunities for people around the world to obtain premium citizenship from

2 INTRODUCTION

EU countries, the US or Canada. Millions of people from Latin America, Eastern Europe, the Middle East, and Asia strategically draw on resources like European ancestry, ethnic origin, migration history, or economic capital in order to obtain a second nationality. The second citizenship operates as *compensatory citizenship*. It does not necessarily lead them to emigrate and does not replace their original nationality. Instead, it makes up for its deficits by providing additional opportunities, an insurance policy, a high-mobility passport, and even elevated social status. Dual citizenship constitutes a new kind of global asset.

This book analyzes the emergence and proliferation of compensatory citizenship through in-depth analyses of three case studies: Hungarian-speaking Serbians who obtain Hungarian citizenship (and an EU passport) thanks to a policy of ethnic preference; upper-class Mexicans who strategically give birth in the United States to secure citizenship for their children, and immediately return to Mexico; and Israelis who acquire EU citizenship from their European countries of origin, over five decades after their families have left those countries as refugees.

In each case, I combine interviews and statistics to analyze applicants' motivations and explore the dynamics of citizenship acquisition on the ground. There is substantial variation in the motivations to obtain dual citizenship: for example, Israelis mainly seek EU citizenship as an insurance policy and status symbol, whereas Serbians acquire it to facilitate emigration and secure travel freedom. Nevertheless, a common logic operates across all those cases. Dual citizenship allows for the conversion of resources between local and global systems of stratification. It leads to a revaluation of characteristics such as ancestry or ethnicity, which gain newfound practical value and are reinforced as axes of within-nation inequality. The rise of compensatory citizenship is associated with the diffusion of a new view of state membership: perceived as a piece of private property, citizenship is increasingly a domain for strategizing and maximizing utility. This new attitude can be described as "the sovereign individual."

To get a sense of this new approach to citizenship, consider the two following cases. Ya'akov, a Jewish Israeli engineer in his fifties, was born in Romania and came to Israel as a child.⁴ I interviewed him at the Romanian embassy in Tel-Aviv, where he applied to reacquire his citizenship and register his daughter as a Romanian citizen. Ya'akov felt entirely Israeli and had no nostalgia for Romania, he said. In fact, he was only interested in securing a "European passport." "This [citizenship]," he added, "is like a luxury article that you buy, a fine watch or a laptop computer. You will probably not use all of its features . . . but you are willing to pay extra for the potential." His wife, Sarah, said: "It's good to have another passport. We live in a very volatile country. Who knows what will happen here in ten years?"

Ricardo, a Mexican businessman in his late thirties, lives with his wife in Monterrey, Mexico, but their four children were born across the border in

the United States. In three of these births, Ricardo's wife crossed the border especially to give birth, in order to make sure that their children will have US nationality in addition to their Mexican nationality. These births took place at a private clinic, at a cost of \$20,000 per birth. Discussing his and his wife's decision to give birth in the United States, Ricardo explained, "We wanted to give [our daughters] the option to choose where to live, study and work . . . Also, we had a big security crisis here before, and many people went to live abroad. So we wanted to give them flexibility to move between the territories."

The attitudes that are reflected in these short vignettes starkly diverge from traditional conceptions of citizenship. They include strategically acquiring citizenship; experiencing the acquisition as an economic transaction; imagining citizenship as a luxury product; mentally detaching the "European passport" from the country that granted it; conceiving of nationality as a source of security, flexibility, and freedom; and believing that good parents should obtain this asset for their children. This book will explore these emergent understandings of citizenship in three case studies, and thereby shed light on the new forms that this key institution assumes in our times.

Why Citizenship Matters

In a world that is dominated by nation-states, citizenship is the master status.⁵ Citizenship defines the scope of rights that an individual may claim and specifies which state is expected to answer those claims. Until the 1990s, formal citizenship (or nationality) was mostly neglected as an object of study by social scientists.⁶ In recent decades, however, academic interest in citizenship has boomed. This interest was initially driven by the dilemmas of immigrant integration in Western Europe and the dynamics of nationalist resurgence in the new countries of Central and Eastern Europe.⁷ More recently, citizenship also emerged as a key perspective for studying inclusion and exclusion within nations (including in the context of diaspora politics) as well as analyzing the structure and dynamics of global inequality.⁸

Below, I briefly outline four key dimensions of citizenship. The first three dimensions—status, identity, and rights—draw on a classic formulation by Christian Joppke.⁹ The fourth dimension, citizenship as global sorting mechanism, captures an emergent perspective that has grown in importance in recent years, and which will be central to this book.

Citizenship as status. Citizenship signifies the formal status of state membership. It is, as the sociologist Rogers Brubaker noted, an instrument of closure that serves to exclude those who are not members of the national community.¹⁰ Citizenship-based closure comes in multiple forms: territorial closure (exclusion of unauthorized noncitizens from the national territory), political closure (exclusion of noncitizens from political decision-making), economic closure

4 INTRODUCTION

(exclusion from the labor market and welfare rights) and social closure (exclusion from the national community). States use bureaucratic mechanisms to ensure citizenship-based closure: proof of nationality is often required in order to vote and receive some services, and border control officials routinely verify the nationality of persons who wish to enter a territory.

Citizenship, Brubaker points out, is not just an instrument of closure; it is also a contested object of closure. In other words, the boundaries of citizenship reflect the distribution of power in society, and determine the present and future contours of the national collective. Citizenship laws, Brubaker famously argued, are shaped by national legacies.¹¹ According to this logic, countries of immigration would have citizenship regimes that facilitate the integration of immigrants by providing automatic citizenship to anyone born in the territory, including the children of noncitizen immigrants. This is called the principle of *jus soli*, or the right of soil. Automatic, unconditional *jus soli* citizenship is found in most countries in the Americas, including the United States and Canada; a qualified version of it exists in France, which employs “double *jus soli*” (the children of French-born persons are automatically French).

Meanwhile, countries that are defined by a connection to a particular ethnocultural group will use descent rather than place of birth as the main criterion for citizenship (the principle of descent is called *jus sanguinis*, right of blood). Such policies make it easy for emigrants who leave the country to retain citizenship and pass it on to their descendants, while restricting the access of immigrants and their children.¹² This principle is dominant in European and Asian countries, where the nation is often imagined as synonymous with a particular ethnic group. Another mechanism of ethnic nationalism consists of citizenship laws that offer facilitated access to members of a defined ethnic, religious, or cultural group: variants of such laws exist in Germany, Spain, Poland, Greece, Romania, Hungary, Israel, Japan, and other countries.¹³

Arguing against the “traditions of nationhood” approach, Patrick Weil has demonstrated that citizenship laws are actually highly responsive to changing historical circumstances.¹⁴ When political conditions call for it, countries with ethnonational traditions may liberalize their citizenship laws to include and accommodate immigrants.¹⁵ The most salient example is Germany. Previously a paradigmatic case of ethnic citizenship, Germany enacted a series of policy changes after 1999. These included a limited toleration of dual citizenship, a qualified form of *jus soli*, and the phasing out of ethnic preference.¹⁶ Marc Howard has shown that the presence of anti-immigrant populist parties may block such liberalizing moves.¹⁷ These works are part of a large body of literature that has demonstrated the dynamic and instrumental nature of citizenship policies: far from blindly enacting national legacies, policymakers are strategic in their use of citizenship to include or exclude individuals and populations based on changing criteria (ethnic, economic, or others).¹⁸

Citizenship as rights. Citizenship is a set of rights that an individual may claim vis-à-vis a specific state. In a classic essay, Thomas H. Marshall has identified three categories of citizenship rights. These include civil rights (equality before the law and individual freedoms), political rights (political voice and, above all, the right to vote) and social rights (welfare, education, and health).¹⁹ Note that these rights—and, more generally, the public goods produced by a state's institutions, such as infrastructure, public safety, the job market, a clean environment—can usually only be enjoyed by persons who are present in the state's territory. Given that control over movement into and within national territory is a key prerogative of the modern state, the right to be admitted to and reside in the national territory should be considered a crucial component of citizenship.²⁰ We should therefore add territorial rights as a component that complements Marshall's model. Today, many scholars understand citizenship as a package of civil, political, social, and territorial rights that is supposed to provide the conditions for human flourishing.²¹

Reality is more complicated and more dynamic than this idealized picture. Most countries do not offer the full package of rights described by Marshall. For example, since the 1970s many Western countries have cut down on social rights (e.g., welfare benefits) while introducing new kinds of civil rights (above all, rights to nondiscrimination).²² Outside the West, few countries even come close to providing the full package of citizenship rights. About half of the world's countries are not democratic and their citizens' political and civil rights are severely curtailed.²³ Many countries simply lack the resources to offer their citizens substantial rights of any kind, due to ineffective and underfunded institutions. Any examination of citizenship rights must go beyond the abstract ideal of citizenship and take into account the huge variation in states' ability to realize the ideal.

Citizenship as identity. Historically, citizenship has evolved as a master status that ensures national unity and supersedes all subnational distinctions based on social class, ethnicity, religion, or race.²⁴ The growth of citizenship is a story of expansion, from an exclusive status that was restricted to a small percentage of the population to a status that unifies an entire nation.²⁵ The bureaucratic leveling of a state's population through the imposition of a uniform status was associated with the creation of a unified national identity. Citizenship, therefore, is a key manifestation of national identity.

The identity aspect of citizenship has been studied in the context of the literature on immigration. Scholars traditionally treated an immigrant's decision to take up citizenship in her country of residence (a procedure called naturalization) as an indicator of successful integration and the adoption of a new national identity.²⁶ Empirical research has shown that immigrants who naturalized in European countries were more likely to identify with their new nations. In a parallel finding from the United States, it was found that immigrants who naturalized tended to speak better English than those who did not become citizens.²⁷

6 INTRODUCTION

This effect extends to the second generation. Second-generation immigrants in the United States, who enjoy automatic *jus soli* citizenship, seem to be better integrated and are more likely to identify with the nation, compared to second-generation immigrants in Europe, many of whom do not have citizenship in their country of residence.²⁸ Citizens do not just have a greater sense of belonging; they are also more likely to be perceived by others as full members who are worthy of solidarity and trust. For example, courts in the United States apply harsher sentences to noncitizens (including legal immigrants) relative to Americans who committed the same crime; employers in Germany are much more likely to call back applicants with foreign-sounding names if their job applications indicate that they hold German citizenship.²⁹

The association of citizenship with national identity stands at the root of the citizenship allocation policies that were described above, under “citizenship as status.” Israel’s Law of Return, which offers automatic citizenship to any Jew who moves to Israel, or the United States’ Fourteenth Amendment (which establishes automatic *jus soli* citizenship) are not just technical definitions of who may claim rights. They also serve a performative function as statements of national identity. In the Israeli case, the law embodies the principle that Israel “belongs” to the Jewish people; US policy is founded on the idea of a nation that belongs first of all to native-born Americans (the same conception informs the restriction that bars an immigrant from becoming President).³⁰ Citizenship policies are used to tie a particular population to a state in both institutional and symbolic terms.

Citizenship, as traditionally understood, is not just one aspect of an individual’s identity. Rather, it is constructed as a sacred form of membership.³¹ Citizens are expected to make sacrifices for their nation and to avoid calculations of individual utility. The clichéd quotation from John F. Kennedy’s 1961 inaugural address—“Ask not what your country can do for you, ask what you can do for your country”—captures this spirit. For most of the twentieth century, the sacred character of citizenship entailed the stigmatization of individuals who gave up their country’s citizenship or became citizens in another country. In many countries, persons who emigrated or took up another nationality were condemned as “traitors,” “sellouts,” or “weaklings.”³² The prevalence of such epithets reflects the traditional assumption that when individuals behave instrumentally in the domain of citizenship, this defiles the sanctity of citizenship and casts shame on the national collective.

In recent years, a growing literature has argued that instrumental attitudes toward citizenship are becoming more common. Christian Joppke coined the term “citizenship light” to describe this instrumental turn. He points out three examples of instrumentalism: citizenship-for-sale schemes, ancestry-based dual citizenship, and EU citizenship. Joppke argues that EU citizenship is the avant-garde of citizenship light because “[it is] exclusively about rights with no complementary duties whatsoever, decoupled from even the thinnest of

identities.”³³ Other authors who have studied the rise of instrumental attitudes toward citizenship described them as “flexible citizenship,” “citizenship à la carte,” “passport citizenship,” or “strategic citizenship.”³⁴ The instrumentalization of citizenship—a conspicuous symbol of a change in values—has encountered fierce political resistance. Claims that citizenship is being cheapened, diluted, or desecrated, along with calls to reinforce national identity, regain control of borders and make the nation “great again,” figure prominently on the agendas of populist movements in the West and beyond it.³⁵

Citizenship as global sorter. The three dimensions of citizenship discussed above pertain to a dyadic relationship between an individual and a specific state (when an individual holds dual citizenship, this is actually a triad).³⁶ A fourth dimension focuses on the way that the possession of a particular citizenship defines an individual’s relation to the entire global system. Viewed from a global perspective, Brubaker argues, citizenship is “an international filing system, a mechanism for allocating persons to states.”³⁷ The underlying legal doctrine has been described by Rainer Bauböck as the “Westphalian conception of citizenship”: every human being must belong to a sovereign nation-state.³⁸

After World War II, Hannah Arendt famously wrote that citizenship was “the right to have rights.” A person without citizenship did not have recourse to any law that would protect her. Thankfully, this principle is not applied today with the same ruthlessness. A series of international conventions provide some (limited) protections for stateless persons.³⁹ Nevertheless, statelessness remains highly problematic from the point of view of states, constituting a disruption to the entire international system—“matter out of place” in the words of anthropologist Liisa Malkki.⁴⁰ Dual nationality, potentially, may be equally problematic. Concerns about the neat sorting of persons into states have led most states to resist dual citizenship for a long time. Today, however, a growing number of countries no longer view overlapping memberships as ipso facto problematic.⁴¹

In theory, global sorting by citizenship places persons into equivalent categories. The “Westphalian” legal imagination at the root of international law treats the world’s countries as sovereign and equal units. In reality, there are vast disparities in value and prestige between the citizenships of different countries. The sorting function of citizenship places people into hierarchically ordered categories. It is therefore a mechanism of stratification.⁴² Audrey Macklin suggested that we can rank countries by the heft of citizenship that they offer.⁴³ One of the most eloquent formulations of the connection between citizenship and global inequality is Ayelet Shachar’s concept of the “birthright lottery”: a critique of the fact that the status that has the largest impact on individuals’ life chances is ascribed at birth, according to particularistic principles.⁴⁴

The key institution that enacts this hierarchical sorting by citizenship is the international system of passports and visa restrictions. This system accords extensive travel freedom to the citizens of rich countries while imposing strict

limits on citizens of less developed countries: a “global mobility divide,” in the words of Steffen Mau and his collaborators.⁴⁵ In this book, I focus on the sorting function of citizenship, which—as I will show—is indispensable for understanding how dual citizenship is perceived and used by individuals on the ground.

The Global Shift Toward Dual Citizenship

For most of the nineteenth and twentieth centuries, most countries prohibited dual citizenship and made significant efforts to suppress it. This ban was enforced through a combination of bilateral treaties, international conventions, and attempts by individual states to monitor their citizens. The view of dual citizenship as an unwelcome anomaly is captured in the words of the nineteenth-century American statesman George Bancroft, who compared it to bigamy.⁴⁶ Since the 1990s, however, a new permissive approach to citizenship has been gaining dominance.

Figure I.1 presents the dual citizenship policies of eighty-eight countries in the Americas, Europe, Oceania, and Asia (comprehensive data for the Middle East and Africa were not available). The graph shows the percentage of countries in each region that permitted dual nationality at naturalization in 1990 and in 2016.⁴⁷

Figure I.1 demonstrates the shift in states’ acceptance of dual nationality: in 1990, only 28 percent of countries in the sample tolerated it; by 2016, it was accepted by 75 percent of those countries. This represents a dramatic change in the relation to a status that until recently was considered highly problematic, even scandalous. Over the past three decades, toleration of dual nationality has grown in all the examined regions, albeit at different paces. The two Western regions included many “early adopters” of multiple citizenship. By 1990, the United States, Canada and New Zealand already permitted dual citizenship; Australia joined them in 2002. In Western Europe, about 30 percent of countries permitted dual citizenship in 1990 (including France, Britain, Ireland, and Portugal); between 1990 and 2016, half the countries in Western Europe changed their laws to permit dual citizenship.

In Latin America and Central and Eastern Europe, pre-1990 acceptance levels were very low—under 20 percent of countries. In those regions, the permissive shift was rapid and dramatic. Today, dual citizenship policies increasingly converge across Europe and the Americas: the acceptance of dual nationality is becoming a new norm in those regions, where over four-fifths of countries permit dual citizenship.⁴⁸ Asia also shows a trend toward the greater acceptance of dual citizenship, but at a much slower pace. While the majority of Asian countries do not permit dual citizenship, the number of accepters has tripled since 1990.

Citizenship in Europe and the Americas has undergone a *post-exclusive turn*. Countries no longer require exclusive allegiance from their citizens. This change is inseparable from another transformation: a *post-territorial turn*, whereby many

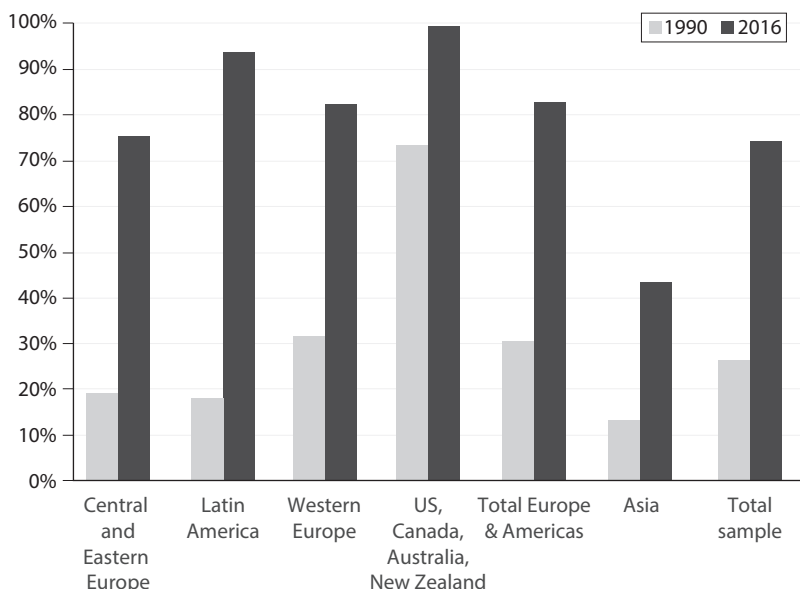


FIGURE 1.1. World regions by percentage of countries that permitted dual citizenship at naturalization in 1990, 2016

Note: The bars show the percentage of countries in each world region that permitted dual citizenship at naturalization in 1990 (lighter bar) and 2016 (darker bar). The sample includes 72 countries in 1990 and 88 in 2016. Countries were coded as permitting dual citizenship if they formally allowed foreigners to naturalize while retaining their original citizenship (“immigrant dual citizenship”) or allowed their citizens to naturalize elsewhere without expatriating them (“emigrant dual citizenship”).

Sources: Author’s calculation based on GLOBALCIT citizenship reports retrieved from www.globalcit.eu, and Liebich 2000; Bloemraad 2004; Escobar 2007; Blatter et al. 2009; and Pogonyi et al. 2010. See also Harpaz and Mateos 2019.

countries expand the scope of rights that they offer to their citizens abroad, including absentee voting and consular protection.⁴⁹ These two shifts are connected: the vast majority of dual citizens reside in just one country and their second citizenship comes from a country in which they do not reside. The proliferation of dual citizenship is also the spread of nonresident citizenship. Here, I will refer to a dual citizen’s residence-country citizenship as their primary citizenship and to their nonresident citizenship as their secondary citizenship.

Pathways to Dual Citizenship

What explains the new permissive attitude toward dual citizenship? Analysts have pointed out changes in the global legal and normative context that have made multiple citizenship increasingly acceptable. They include the end of

10 INTRODUCTION

the Cold War, the abolition of conscription, processes of democratization and liberalization, new norms of gender equality, intensified international migration, and more.⁵⁰ While these contextual factors are important, we should remember that governments do not change citizenship laws in response to a general ambience of tolerance. Instead, governments and lawmakers move to permit dual citizenship because they believe that it will further the well-being, power, or prestige of the nation, as defined by their political ideology and interests.

Different countries have made the move toward the permission of dual citizenship for different reasons. Studies of legal and policy dynamics highlight this diversity.⁵¹ In the United States, the toleration of dual citizenship was pushed by the Supreme Court, which, in a series of rulings since the 1950s, limited the government's authority to expatriate US citizens against their will.⁵² In most other cases, dual citizenship became accepted in the context of migration or ethnic politics. Immigrant-receiving countries such as Sweden and Finland permitted dual citizenship in order to facilitate the integration of immigrants and their children.⁵³ Emigrant-sending countries such as Mexico or Turkey permitted dual citizenship to encourage emigrants to naturalize abroad while holding on to their original citizenship and identity.⁵⁴ Countries that had lost territories in the twentieth century—including Hungary, Romania, Bulgaria, Croatia, and Serbia—offer dual citizenship to cross-border ethnic kin to bring them back into the national fold.⁵⁵

In all of these cases, the actual scope and impact of dual citizenship go beyond the initial motivations that have inspired its acceptance. Once states offer individuals the possibility to become dual citizens, bottom-up dynamics inevitably lead to a host of unintended consequences. In contrast to the extensive literature that adopted a state-centered approach, fewer studies have explored the implications of dual citizenship for the individuals who acquire and use it. The existing case studies on dual citizenship outside the West (which will be discussed in detail in chapter 1) reveal some common patterns that this book will explore in a more systematic comparative manner.

While researchers have analyzed data on dual citizenship from the European Social Survey, selected censuses and surveys and official statistics from citizenship-granting countries, the statistical picture is far from complete.⁵⁶ There is still a need for statistics that would shed light on the global demographics of dual citizenship, including comparative data on prevalence and demand.⁵⁷ In chapter 1, I will present such a dataset, that I constructed from original data.

In order to formulate a new analytical approach to citizenship, we also need to expand our theoretical toolbox. Social scientists' understanding of citizenship has traditionally been framed by concepts and theories that were developed to analyze immigrant integration, minority politics, and transnationalism.⁵⁸ The approach I propose in this book builds upon this literature, but also expands

the theoretical lens by integrating the global, population-sorting function of citizenship, and highlighting its role as a marker of differential status within a global hierarchy. This reframing broadens the analysis beyond questions of national identity and loyalty, bringing to the fore the practical value of dual citizenship as a source of additional opportunities, security, rights and travel freedom.

A New Approach: Investigating Compensatory Citizenship

This book focuses on a mostly overlooked type of dual citizenship that I call *compensatory citizenship*: dual citizenship from a Western or EU country that is acquired by individuals living outside Western Europe and North America. At least three million people in Latin America, Eastern Europe, and Israel have acquired dual citizenship from EU countries. Hundreds of thousands worldwide have acquired compensatory citizenship through other means, such as strategic birth or residence. The rise of compensatory dual citizenship is a direct consequence of the post-exclusive turn in citizenship.

There are six main pathways that citizens of countries outside the West use to secure a second, Western citizenship. Chapters 2, 3, and 4 of this book will analyze three study cases that represent the three pathways that involve the largest number of persons.

1. *Ancestry-based citizenship acquisition.* Descendants of European emigrants living outside Western Europe and North America obtain EU dual citizenship from their origin countries. Major citizenship-granting countries include Italy, Spain, Poland, and Germany. Applicants mostly hail from Latin American countries (including Argentina, Brazil, Mexico, and Venezuela) as well as Israel.⁵⁹

I study this pathway by focusing on the case of Israelis who apply for EU citizenship.⁶⁰ Between the 1920s and the 1960s, about a million Jews from Poland, Germany, Romania, and other countries settled in Israel (before 1948, the Palestine Mandate). They mostly came as refugees who fled persecution, and typically severed all links to their origin countries. Since 2000, over 85,000 Israelis with roots in Central and Eastern Europe have applied to reacquire citizenship in their countries of origin. Their declared aim is to secure a “European passport,” and they show minimal interest in their countries of origin.

2. *Coethnic citizenship acquisition.* Individuals obtain dual citizenship from kin-states on the basis of ethnic origin. Numerous countries in Central and Eastern Europe offer coethnic citizenship, including Hungary, Romania, Bulgaria, and Greece, among others. Applicants

12 INTRODUCTION

mostly come from neighboring countries in the region, especially those that are not EU members, such as Serbia, Ukraine, Macedonia, and Moldova.⁶¹

I study the coethnic pathway through the case of Hungarian dual citizenship in Serbia. The multiethnic region of Vojvodina, now in northern Serbia, is home to a sizable Hungarian minority. In 2011, Hungary enacted a new policy that made Vojvodina's ethnic Hungarians eligible for dual citizenship. By 2018, over 180,000 citizens of Serbia had obtained a second citizenship from Hungary. This demand is driven in part by an authentic identification with Hungary among cross-border Hungarians—but it also reflects the strong desire of Serbians to become citizens of the EU and earn the right to work and study in Western Europe. Not all applicants are ethnically Hungarian: many ethnic Serbs have begun to study the Hungarian language with the express aim of securing EU citizenship.

3. *Strategic cross-border birth.* Middle- or upper-class individuals from many countries in Asia, Latin America, and the Middle East travel to the United States or Canada in order to give birth there. After they secure citizenship for their children thanks to automatic *jus soli* laws, they return to their home country. There is evidence that this strategy—colloquially called birth tourism—is employed by citizens of Mexico, China, Turkey, Taiwan, among others.⁶²

I study this pathway through the case of Mexican strategic birth in the United States.⁶³ In 1998, Mexico permitted dual nationality. This move was primarily intended to encourage Mexican immigrants to naturalize in the United States while retaining their nationality. An unintended consequence has been a growth in the number of dual nationals in Mexico. While most of this growth is the result of deportation and return migration, there has also been a rapid growth in the number of elite Mexican parents who travel across the border to the United States, give birth, and immediately return to Mexico. An estimated figure of 140,000 Mexicans have secured US citizenship for their children in this manner since 1990.

The book will focus on these three pathways to compensatory citizenship. There are at least three additional pathways to compensatory citizenship. While they form part of the same global phenomenon, they will not be analyzed in this book. These include (4) *residence strategies*, which involve individuals who naturalize in Western countries and then immediately return to their origin countries or migrate onward;⁶⁴ (5) *matrimonial strategies*, whereby individuals obtain dual citizenship through marriage;⁶⁵ and (6) *citizenship by investment*,

which involves high-net-worth individuals who obtain a second citizenship by purchasing expensive real estate or making a monetary investment.⁶⁶

The three study cases included in this book were selected to represent the three main pathways to compensatory citizenship: ancestry, ethnicity, and strategic birth. I collected extensive data on those cases through fieldwork and interviews (see methodological appendix). The diversity of cases also permits two additional axes of internal comparison. First, the Serbian and Israeli cases represent the dynamics of dual citizenship in the EU, where blood ties—ancestry and ethnicity—are central to citizenship allocation; the Mexican case illustrates the dynamics of dual citizenship from the United States, which is premised on the deliberate creation of citizenship ties (through strategic birth) where no prior connection exists.

The three-case design also makes it possible to compare countries with different positions in the global hierarchy. Serbia and Mexico are middle-income economies and massive senders of emigration; these countries' patterns of trade and migration show tight dependence on their respective adjacent Western blocs (the EU for Serbia, the United States for Mexico). In contrast, Israel is a high-income, low-emigration country that is not dependent to such a degree on trade with a single Western bloc.⁶⁷ This makes it possible to compare cases where the practical usefulness of dual citizenship is self-explanatory (Serbia and Mexico) alongside a case where the use of citizenship is less obvious (Israel).

Roadmap for the Book

This book aims to reposition the phenomenon of dual citizenship within the context of global inequality and analyze it as a strategy of resource accumulation. Chapter 1 lays out the theoretical framework for the book. It describes a model of the global citizenship hierarchy. Within this hierarchy, citizenship from Western or EU countries provides the highest level of rights, opportunities, and travel freedom. Once dual citizenship became available, millions of individuals from middle-tier nations in Latin America and Eastern Europe drew on their ancestry or ethnicity to obtain EU citizenship. For those individuals, compensatory citizenship is a deliberate strategy of upward mobility in the global hierarchy.

The following chapters explore three cases that illustrate the dynamics of compensatory citizenship on the ground. Chapter 2 explores the case of Hungarian dual citizenship in Serbia. Since 2011, Hungary has offered dual citizenship to cross-border Hungarians living in neighboring countries. Coethnic dual citizenship has complicated and contradictory effects on Serbia's Hungarian minority. On the one hand, they enjoy access to Europe, as well as elevated social status in Serbia. On the other hand, the proliferation of EU passports makes it easier for young Hungarians to emigrate, shrinking this beleaguered

14 INTRODUCTION

population even further. Meanwhile, thousands of ethnic Serbs have also begun to study the Hungarian language. They hope to take advantage of Hungary's generosity toward Hungarian speakers in order to thereby gain access to the EU.

In chapter 3, I study the growth in US dual nationality in Mexico, and specifically the phenomenon of strategic cross-border births. This involves middle- and upper-class Mexican parents who travel to the United States to give birth, aiming to secure US citizenship for their children. The families who engage in this practice typically have little interest in emigrating. Instead, they mainly view the United States as a site of high-prestige consumption and wish to provide their children with easy access to tourism, shopping and education across the border. The American passport is also an insurance policy that allows easy exit at times of insecurity in Mexico. This strategic acquisition of US dual nationality by upper-class Mexicans can be juxtaposed with another recent trend: the deportation of hundreds of thousands of Mexican undocumented immigrants, who take their US-born children with them to Mexico.⁶⁸ For the former group, dual nationality is voluntary and practical; for the latter, it is an imposed disadvantage.

In chapter 4, I analyze EU citizenship in Israel. EU-Israeli dual citizens rarely refer to themselves as dual citizens, but instead see themselves as "Israelis with a European passport." The findings show that citizenship applicants are mainly driven by two motivations that were conditioned by Jewish history: the wish to hold an insurance policy against the possibility of Israel being destroyed, and the desire for a status symbol that signifies their elitist position in Israel as European-origin Jews. Ironically, the grandchildren of Jews who had left Europe for Israel now look to German or Hungarian passports for security.

In the conclusion, I discuss the theoretical implications of the book's findings. The proliferation of compensatory citizenship contributes to the commodification of nationality through multiple pathways: the emergence of citizenship industries, the exchange of citizenship for cash, and the instrumentalization of national belonging. Respondents exhibit an attitude that I call "the sovereign individual"; they understand citizenship status as a domain for individual free choice and maximization of utility, free from traditional collective dictates. In other words, citizenship is changing from an ascribed to an achieved status. The legal acceptance of multiple nationality has made Western citizenship into a valuable practical resource for elites in other parts of the world, allowing them to convert local advantages into a new kind of capital that elevates their position within the global system of stratification.

INDEX

- Alba, Richard, 69
Altan-Olcay, Özlem, 18, 167n80
American-Mexican dual nationality: births in the United States to nonresident mothers and, 76–77; categories of dual nationals, 68; categories of dual nationals in Mexico, 72–73; citizenship industry associated with, 82–83; demographics of Mexican birth strategizers, 68–69; family dynamics and, 84–86; legal and historical background, 69–72; motives for seeking, 78–79, 86–92; opportunities associated with, 86–88; pathways to, 158n32; process of acquiring, 79–83; security and risk-mitigation concerns associated with, 87–90; as social closure and status, 92–95; statistical data on, 72–77; strategic cross-border birth, as case study of, 12; travel freedom associated with, 90–92; trends reshaping the citizenship constellation of Mexico and the United States, 67–68; US-born persons in Mexico and, 73–75
ancestry-based citizenship acquisition, 11; demand for, evaluating variation in, 30–37; EU-Israeli dual citizenship as a case of (*see* EU-Israeli dual citizenship)
anchor babies, 164n9
Anderson, Benedict, 25–26, 133
Arendt, Hannah, 7, 117

Balta, Evren, 18, 167n80
Bancroft, George, 8
Bauböck, Rainer, 7
Bauman, Zygmunt, 132, 143
birthright citizenship (*jus soli*), 4, 6, 12, 68–70, 80, 164n10
birthright lottery, 7, 20, 126
birth tourism. *See* strategic cross-border birth
Black, Hugo, 137

Bourdieu, Pierre, 62, 87, 98, 112, 123, 170n36, 171n2
Brecht, Bertolt, v
Brubaker, Rogers, 3–4, 7, 45, 58, 139, 141

Calderon, Felipe, 88
Castles, Stephen, 132
CEE. *See* Central and East European countries
Central and East European (CEE) countries: demand for Hungarian dual citizenship in, 45–46; dual citizenship held by Israelis in, 98 (*see also* EU-Israeli dual citizenship); dual citizenship policies in, 39–40, 100; middle tier dominated by, 22–23; nationalization without nationalism in, 58; the West, movement towards, 57
citizenship: compensatory (*see* compensatory citizenship); dimensions of, 3–8; dual (*see* dual citizenship); exclusive, 1; flexible, 114, 135–36; global hierarchy of, 15–16, 19–22, 126; as global sorting mechanism (*see* sorting function of citizenship); identity and (*see* identity); instrumental attitudes toward, 6–7, 126–27; by investment, 128–29; *jus sanguinis* (right of blood), 4, 100, 107, 164n3; *jus soli* (right of soil), 4, 6, 12, 68–70, 80, 164n10; long-distance acquisition of, 30–37; opportunistic attitude towards, 129–31; post-exclusive and post-territorial shifts in, 8–9; quantifying, 21; resident, components of, 21; restitution and, 100–101; as rights (*see* rights); the “sovereign individual” as attitude towards, 2–3; as status, 3–4, 127–31; stratification by, 19–21; value of (*see* citizenship value)
citizenship hierarchy approach: Hungarian dual citizenship and, 45–47. *See also* global citizenship stratification
citizenship industries: American-Mexican dual nationality and, 82–83; citizenship

- citizenship industries (*cont.*)
by investment, global industry of, 128–29; comparison across cases, 127–28; EU-Israeli dual citizenship and, 108–10; Hungarian-Serbian dual citizenship and, 49–53; legitimation of dual citizenship and the growth of, 129
- citizenship light, 6–7, 137
- Citizenship Quality Index (CQI), 20–22
- citizenship stripping, 70, 117, 140, 165n18
- citizenship value: elements of, 21; global hierarchy of, 19–22; mapping tiers of, 22–25; tiers of, dual citizenship and, 25–26
- class: American-Mexican dual nationality and, 86–88, 92–95; entry to the United States by land and, 91; EU-Israeli dual citizenship and, 120–22; strategic birth and, 68–69, 81; stratification by citizenship versus, 19–20
- coethnic citizenship acquisition, 11–12; demand for, evaluating variation in, 30–37; Hungarian dual citizenship in Serbia as case study of (*see* Hungarian-Serbian dual citizenship)
- compensatory citizenship, 2; American-Mexican dual nationality as case study of, 69 (*see also* American-Mexican dual nationality); EU-Israeli dual citizenship as case study of, 97–98, 125 (*see also* EU-Israeli dual citizenship); Hungarian-Serbian dual citizenship as a case study of, 65 (*see also* Hungarian-Serbian dual citizenship); as an instrumental strategy of global upward mobility, 16, 127, 138; pathways to, 11–13 (*see also* ancestry-based citizenship acquisition; coethnic citizenship acquisition; strategic cross-border birth); populism and, 142; sentimental dual citizenship, distinction from, 18–19
- Cook-Martin, David, 17
- cross-border mobility: of Serbs, 59–61.
See also passports
- Democracy Index, 21, 154n23
- dual citizenship, 1–2; demand for, evaluating variation in, 30–37; to evade tax authorities or law enforcement, 156n4; the future of, 141–43; the global hierarchy of citizenship and, 16; global shift toward, 8–9; individual-level perspective on, 16–17; instrumental value of outside Western Europe and North America, 17–19; motives to obtain, 2; political rights and, 133–34; populism and, 141–43; prevalence of, 27–30; reasons for the move toward, 10; sentimental value of in the West, 17; statistics on, 27–37; tiers of citizenship countries and, 25–26; traditional resistance of states to, 7
- emigration: from Hungary, 58; from Israel, 102–3; negative stereotypes regarding, 58; from Serbia, 47, 56–59. *See also* immigration
- ethnicity: coethnic dual citizenship as an agent of national homogenization, 58–59; dual citizenship and, 92–94, 120–24; EU membership and, 66; national and citizenship, 4, 101; “nationality” in Central and Eastern Europe as synonymous with, 159n7; paradox of politicization in Central and Eastern Europe, 65; preference based on, 42–43. *See also* coethnic citizenship acquisition
- EU. *See* European Union
- EU-Israeli dual citizenship: citizenship specialists facilitating acquisition of, 108–10; commodity/restitution perspective on, 110–11; compensatory citizenship, as case study of, 97–98; emigration and, 104; EU expansion and, 103–4; family dynamics and, 111–14; legal and historical background, 99–101; motives for seeking, 98, 105–7, 113–20; opportunities associated with, 114–16; process of acquiring, 107–11; the security situation in Israel and, 103, 116–18; as social closure, reclaiming Ashkenazi privilege and, 120–24; statistical data on, 101–4; travel freedom associated with, 118–20
- European Union (EU): benefits of citizenship in a member country, 114–15; citizenship in as “citizenship light,” 6–7; citizenship reacquisition programs in, 39; ethnic nationalism and, 39, 42–43; expansion of, opportunities created by, 97, 103–4; long-distance citizenship acquisition in, 31–37; middle-tier citizenship countries and, 25–26
- family dynamics: American-Mexican dual nationality and, 84–86; EU-Israeli dual citizenship and, 111–14; Hungarian-Serbian dual citizenship and, 53–55
- FitzGerald, David, 16, 93
- flexible citizenship, 114, 135–36

- Germany: acquisition of citizenship and emigration to, 102–3; dual nationals among immigrants to, percentage of, 156n6; German citizenship for Israelis, 103–4; Israeli immigration to Berlin, 115; liberalization of citizenship laws after 1999, 4; restitution of citizenship for German Jews, 101
- global citizenship stratification: dual citizenship and, 30–37, 138–40; mapping tiers of, 22–25; prevalence of dual citizenship and, 27–30; tiers of citizenship countries and, 25–26; travel freedom and, 59–61, 132–33 (*see also* travel freedom). *See also* citizenship hierarchy approach
- global inequality: the birthright lottery and, 7, 20; the hierarchy of citizenship and, 15–16, 19–22
- Guzman, Joaquin “El Chapo,” 94
- Henley & Partners, 22–23, 129
- Herder, J. G., 161n28
- Hindess, Barry, 18
- Howard, Marc, 4
- Hoyo, Henio, 71
- Human Development Index (HDI), 21
- Hungarian-Serbian dual citizenship: as case study of compensatory citizenship/coethnic citizenship acquisition, 2, 12–14, 40; citizenship industry developed around, 49–53; as citizenship reacquisition program, 39–40; collective status hierarchies and, 63–65; demand for, 33–35, 45–47; effects of, 65–66; family dynamics and, 53–55; legal and historical background, 41–43, 45; motives for seeking, 40, 48–49, 54–61; nonresident voting and, 134, 161nn25–27; opportunities associated with, 56–59; social closure for individuals from, 61–63; strategic (non-Hungarian) applicants for, 47–48, 50–53, 55, 61–62, 66
- Hungary: birth rate and population of, 43; coethnic citizenships approved, 2011–2016, 31–32; criticism of citizenship policy, 42–43; emigration from, 58; openness to dual citizenship held by nonethnic Hungarians, 50–51; rejection of dual citizenship in 2005, 160n16; territorial designs on Vojvodina, concerns regarding, 63
- identity: citizenship as, 5–7; of immigrants, 5–6; from national to individual, dual citizenship and, 134–38; as sovereign individual, 2–3, 137–38
- immigration: dual citizenship and, 16–17; of East Europeans, Hungary’s citizenship policy and concerns regarding, 42–43; liberalization of citizenship laws and, 4; between Mexico and the United States, 67–68, 72, 89, 96; “migration hump,” 72, 165n27; national identity and, 5–6; naturalization rate of immigrants, 165n23. *See also* emigration
- Immigration Reform and Control Act of 1986, 70
- Israel: as case study of ancestry-based citizenship acquisition, 11, 14; as case study of compensatory citizenship, 2; citizenship policy in, 99–100, 168n13, 169n28; class and ethnic stratification in, 121; the discourse of the sovereign individual in, 136; emigration rate from, 155n67; EU-Israeli dual citizenship (*see* EU-Israeli dual citizenship); exports, distribution of, 155n67; GDP per capita, 155n67; generational structure of the Ashkenazi family in, 111; Law of Return, 6, 100; motivation to acquire dual citizenship for citizens of, 2
- Italy: ancestry-based citizenships approved, 1998–2010, 31; demand for dual citizenship from, 35–36
- Jansen, Stef, 59
- Joppke, Christian, 3, 6, 137, 141
- jus sanguinis* citizenship (right of blood), 4, 100, 107, 164n3
- jus soli* citizenship (right of soil), 4, 6, 12, 67–70, 80, 164n10
- Kälin, Chris, 129
- Kennedy, John F., 6
- Kim, Jaeun, 127
- Knott, Eleanor, 18
- Kochenov, Dimitry, 154n25, 157n19, 157n23, 159n1, 171n17
- Kovács, Mária, 43
- Kranz, Dani, 115
- Lake, David, 154n42
- Macklin, Audrey, 7, 20
- malinchismo*, 91–92, 94
- Malkki, Liisa, 7
- Marshall, Thomas H., 5, 131
- Martin, Phillip L., 165n27

202 INDEX

- Marx, Karl, 19
Massey, Douglas, 70
Mateos, Pablo, 17, 68, 74, 93, 140
Mau, Steffen, 8
methodology: for the Citizenship Quality Index, 157n22; data, sources of, 147–49; interviewer effect, 172n30, 172n32; interviews, 149–52; US nationals, estimating the number of, 165n32
Mexico: as case study of compensatory citizenship, 2; as case study of strategic cross-border birth, 12, 14; citizenship policy in, 70–72; class position of birth-strategizing parents, 68–69, 86–88, 92–94; the discourse of the sovereign individual in, 135–36; emigration rate from, 155n67; exports to the United States, percentage of, 155n67; GDP per capita, 155n67; map of, 71; motivation to acquire dual citizenship for citizens of, 2–3; nationals/nationality and citizens/citizenship, distinction between, 153n5, 164n2; racial bias in, 92–93; violence in, 88–89. *See also* American-Mexican dual nationality
migration hump, 72, 165n27
Milanovic, Branko, 19
Milošević, Slobodan, 57, 62
Molnár, Judit, 163n67

nationalism: ethnicity and (*see* ethnicity); long-distance, 26, 133; nationalization without, 58; post-territorial, 45
naturalization, 5
Nietzsche, Friedrich, v

Ong, Aihwa, 18, 113–14, 135
opportunism, 129–31
opportunity: American-Mexican dual nationality and, 86–88; as a component of resident citizenship, 21; EU-Israeli dual citizenship and, 114–16; Hungarian-Serbian dual citizenship and, 56–59
Orbán, Viktor, 42–43, 51–52, 57, 134, 161n24

passports: focus on for Israeli dual citizens, 98; as a gift within the family, 112–13; ranking of, 20–23, 34, 36, 157n23; as status symbol, 120–24; travel freedom and, 47, 59–61, 90–92, 118–20, 132–33
Paz, Octavio, 92
Pocock, John, 131

Pogonyi, Szabolcs, 17, 42, 45
Portes, Alejandro, 17
post-territorial nationalism, 45

rights: citizenship as, 5; civil and social, 133; as a component of resident citizenship, 21; political, 133–34; territorial, 131–33

Salvini, Matteo, 141
Sasson-Levy, Orna, 121
Scheppelle, Kim, 43
security: as a component of resident citizenship, 21; as a factor in American-Mexican dual nationality, 88–90; Israeli dual citizenship acquisition and, 103, 116–18; territorial rights and, 131–32
Serbia: coethnic dual citizenship policy of, 43, 45; emigration from, desire for, 47, 56–59; emigration rate from, 155n67; exports to the EU, percentage of, 155n67; GDP per capita, 155n67; Hungarian-Serbian dual citizenship (*see* Hungarian-Serbian dual citizenship); identity and citizenship in, 136–37; map of, 44; political history of, 160n9; travel freedom as an issue in, 59–61; Western Europe and, gap between, 56–57
Shachar, Ayelet, 7, 20
Shamir, Ronen, 132
Skeldon, Ronald, 72
social capital, 87
sorting function of citizenship: as dimension of citizenship, 7–8; as hierarchical, 7–8, 126, 138–40
sovereign individual: as attitude towards citizenship, 2–3; rise of, 134–38
Spiro, Peter J., 173n53
State Fragility Index (SFI), 21
statelessness, 7
status: citizenship as, 3–4; citizenship industries and the commodification of citizenship, 127–31; passports as a symbol of, 120–24
strategic cross-border birth, 12, 96, 164n10. *See also* American-Mexican dual nationality

Telles, Edward, 92
Tintori, Guido, 17
Torpey, John, 154n20
travel freedom, 47, 59–61, 90–92, 118–20, 132–33

- Trianon, Treaty of, 41–42
Trump, Donald, 95, 141, 172n23
- United States: citizenship policy in, 68–70;
citizens living abroad, 96; dual nationals among immigrants to, percentage of, 156n6; Fourteenth Amendment, 6, 69; strategic cross-border births to secure dual citizenship in (*see* American-Mexican dual nationality)
- Vučić, Aleksandar, 62
- Wallerstein, Immanuel, 22
Weber, Max, 88
Weil, Patrick, 4, 69–70, 99, 135, 137–38
- Yugo-nostalgia, 57
- Zelizer, Viviana, 84, 112, 170n36