



**JUBILEE CAMPAIGN  
ECOSOC Special Consultative Status (2003)**

**With:  
Set My People Free  
Voice for Justice**

**Submission to the United Nations Human Rights Committee regarding  
The Islamic Republic of Pakistan  
For the 142nd Session  
14 October - 8 November 2024  
STATES PARTIES REPORT**

Jubilee Campaign is a non-governmental organization in consultative status with the Economic and Social Council since 2003. Our work focuses on promoting the rights of religious and ethnic minorities and raising the status of vulnerable women and children - to protect them from bodily harm and exploitation.

## I. Introduction

Jubilee Campaign, in special consultative status with ECOSOC, and joined by Set My People free and Voice for Justice, submits this analysis of religious freedom and human rights in the Islamic Republic of Pakistan as a contribution in advance of the 142nd Human Rights Committee's review of States Parties in October and November 2024. In particular, this present submission reviews the Committee's List of Issues provided to Pakistan in November 2023, Pakistan's [replies](#) in May 2024, and developments which have transpired between and since the publication of these reports.

## II. International Covenant on Civil and Political Rights<sup>1</sup> - articles relevant to present submission

### Article 6

*Every human being has the inherent right to life. This right shall be protected by law. No one shall be arbitrarily deprived of his life.*

*In countries which have not abolished the death penalty, sentence of death may be imposed only for the most serious crimes...*

### Article 7

*No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.*

### Article 9

*Everyone has the right to liberty and security of person. No one shall be subjected to arbitrary arrest or detention.*

### Article 18

*Everyone shall have the right to freedom of thought, conscience and religion. This right shall include freedom to have or to adopt a religion or belief of his choice, and freedom, either individually or in community with others and in public or private, to manifest his religion or belief in worship, observance, practice and teaching.*

## III. Freedom of thought, conscience, and religion (Article 18), as it relates to freedom from torture (Article 7); freedom from arbitrary arrest (Article 9); and freedom from arbitrary deprivation of life (Article 6)

### A. Blasphemy laws, perceived religious offenses, capital punishment, and extrajudicial killings

Notwithstanding clarifications by global human rights bodies<sup>2</sup> as regards what constitutes "most serious crimes" such as tremendous violence, for which capital punishment may be reasonably authorized, and alternatively the consensus across some regional human rights entities<sup>3</sup> that the death penalty is inhumane and unjustifiable in all cases, Pakistan has continued to permit the imposition of death sentences for alleged blasphemy. In November 2023, the Human Rights Committee submitted to Pakistan its List of Issues and requested the State Party to provide written responses preceding the upcoming 142nd Session. In its reply, filed in March 2024 and published in May, Pakistan makes the following absurd justification for its codification of capital punishment:

*"72. Article 6 of the said Covenant states that in countries which have not abolished the death penalty, [the] death sentence may be imposed only for the most serious crimes. There is no international consensus on the definition of 'most serious crimes'. The policy of [the] death penalty in Pakistan is in line with its constitution and international obligations".<sup>4</sup>*

*"74. Pakistan has reviewed the existing laws containing [the] death penalty, to determine if the scope can be reduced. Accordingly, the number of offences for which [the] death penalty may be imposed was reduced in the Control of Narcotic Substances Act, 1997 and the Railways Act, 1980.*

<sup>1</sup> UN General Assembly, *International Covenant on Civil and Political Rights*, 16 December 1966, United Nations, Treaty Series, vol. 999, p. 171.

<sup>2</sup> UN Secretary-General; UN Human Rights Council; UN General Assembly; African Commission on Human and Peoples' Rights (ACHPR).

<sup>3</sup> Inter-American Commission on Human Rights (IACHR); Council of Europe;

<sup>4</sup> [Pakistan] UN Human Rights Committee, *Replies of Pakistan to the list of issues in relation to its second periodic report*, [CCPR/C/PAK/RQ/2](#), 20 May 2024.

*In addition to these, a number of judicial safeguards are in place for restricting the scope of [the] death penalty”.*

In fact, Pakistan’s replies include a reaffirmation of capital punishment as a penalty for blasphemy specifically:

*“134. It is pertinent to note that the blasphemy laws are applicable to every citizen of Pakistan without any prejudice. However, the Government has undertaken efforts to prevent the misuse or abuse of blasphemy laws, through amendments in the legal procedure. The preliminary inquiry in blasphemy cases is now carried out at the level of District Police Officer to ensure [the] safety of citizens.”*

*“135. There is also an effective process of appeal in case of conviction. If any accused [individual] is convicted and awarded capital punishment by [the] Court of Sessions, the same is required to be confirmed by two judges of the High Court otherwise it cannot be implemented. After the decision of the High Court, the convict has the remedy to appeal to the Supreme Court of Pakistan. If the apex Court upholds the verdict of the High Court, a mercy petition can be submitted to the President of Pakistan”.*

Pakistan claimed in its second periodic report in December 2022 that its blasphemy laws are “non-discriminatory in nature as it deals with offenses against all religions and applies to Muslims and non-Muslims alike”.<sup>5</sup> Now, two years later, Pakistan maintains the so-called legitimacy and inclusiveness of its blasphemy laws, asserting once again that “blasphemy laws are applicable to every citizen of Pakistan without any prejudice”.<sup>6</sup> Firstly, it is important to reaffirm the stance of Jubilee Campaign, Set My People Free, and Voice for Justice that blasphemy laws are by nature and in essence inconsistent with human rights and religious freedom, regardless of whether such laws are applied against supposed violators in a ‘non-discriminatory’ manner as regards their faith and the faith which they are insulting. The very codification of blasphemy as an offense is unacceptable, and Pakistan’s attempt to boast the non-exclusionary application of blasphemy laws is an affront to religious freedom standards. Nonetheless, such claims necessitate even further scrutiny, as penal provisions 295-B (which carries a penalty of life imprisonment) and 295-C (which stipulates capital punishment) explicitly criminalize defamation of the Prophet and “defiling” the Quran, thus constituting a violation of equal treatment before the law. Moreover, in January 2023, the National Assembly voted to expand the nation’s blasphemy laws to include a term of imprisonment between ten years to life for any individual convicted for allegedly insulting any person connected to the Prophet, such as his companions, wives, and relatives. The sentence would additionally impose a fine of one million Pakistani Rupees and “makes the charge of blasphemy a non-bailable offense. Fortunately, despite passing both the National Assembly (in January) and Senate (in August 2023), Former President Arif Alvi declined to sign the bill, citing his concerns that making blasphemy a non-bailable offense “could potentially be abused, leading to the wrongful apprehension of innocent citizens”. Interestingly, President Alvi did not raise dissent with the 7-year prison term increase for blasphemy.<sup>7</sup>

Pakistan touts the Anti-Terrorism (Amendment) Act of 2005 (ATA) for protecting “the civil and political rights of people under the Covenant, and prevents the misuse of the law”. Such an affirmation is entirely baseless, as the ATA is in itself being applied in a manner which violates the right of faith minorities to freedom of religion or belief. In June 2023, following protest marches organized by the radical Islamist political party Tehreek-i-Labbaik, the government signed a 12-point agreement, according to which it committed to establishing a ‘Counter Blasphemy Wing’ within the Federal Investigation Agency; the agreement also included a commitment to prosecute those accused blasphemy under Section 7 of the ATA.<sup>8</sup> The Cyber Crime Wing of Pakistan’s Federal Investigation Agency (FIA) has been actively involved in charging young people with blasphemy. Blasphemy accusations surged after the government granted the FIA authority parallel to that of the police, resulting in hundreds of youths facing allegations due to their use of social and digital media. In January 2024, a Special Branch of Punjab Police inquiry reportedly revealed widespread abuse of blasphemy laws in connection with cybercrime regulations, referring to it as a “Blasphemy Business.”<sup>9</sup> However, the findings of this report and the investigation were not made public. In addition to convicting Christian man Ehsaan Masih of blasphemy in June 2024 under Section 295 of the Penal Code and sentencing him to death for allegedly sharing videos to social media of desecrated pages of the Quran, the Sahiwal District Anti-Terrorism Court imposed an additional five-year prison term under Section 7 of the ATA.<sup>10</sup>

<sup>5</sup> [Pakistan], *Second periodic report submitted by Pakistan under article 40 of the Covenant, due in 2020*, [CCPR/C/PAK/2](#), UN Human Rights Committee, 7 December 2022.

<sup>6</sup> *Supra note 4*.

<sup>7</sup> Hasseb Hanif, “NA toughens law against insult to pious people”, *The Express Tribune*, 17 January 2023. ; Nadir Guramani, “Senate passes bill to ramp up punishment for blasphemy to at least 10 years”, *Dawn*, 8 August 2023. ; Waqas Ahmed, “President objects to CrPC amendment bill”, *The Express Tribune*, 22 August 2023.

<sup>8</sup> Kalbe Ali & Iftikhar A. Khan, “TLP ends protest after 12-point deal with govt”, *Dawn*, 18 June 2023.

<sup>9</sup> Ahmad Noorani, “Pakistan Prosecutes Over 400 Bright Youth on Blasphemy Charges”, *Fact Focus*.

<sup>10</sup> Christian Daily, “Christian sentenced to death under Pakistan’s blasphemy law”, 3 July 2024.

The Committee sought responses from Pakistan regarding “(a) restrictions on the right to freedom of conscience and religious belief...; and (b) an increase in discrimination and violence, including attacks and threats, accusations of blasphemy, targeted killings, mob violence, forced religious conversions, including of children, hate speech and hate crimes against persons belonging to religious minorities, and attacks on their places of worship”.<sup>11</sup> This inquiry is especially important in that it was raised to Pakistan just two months after one of the worst outbreaks of blasphemy-related mob violence within the past few years. In August 2023, two Christian brothers - Rocky and Rajah - were accused of blasphemy by Muslim community members in Jaranwala, Faisalabad. Local Christian and Muslim leaders convened to review the accusation and found that the two brothers were likely framed; the ‘evidence’ of their crime was a few torn out pages of the Quran which were scribbled on to include the brothers’ names and profile images.<sup>12</sup> The interfaith leaders reached a consensus that this ‘proof’ was dubious as it would be illogical for the brothers to intentionally write their own names on disposed pages of the Quran and thus implicate themselves, especially considering the heinous pattern by which individuals accused of blasphemy in Pakistan are often viciously attacked and sometimes even extrajudicially lynched in public by incensed radical Muslims. Despite reasonable members of local Christian and Muslim residents agreeing that the blasphemy allegations were in effect unsubstantiated, within hours the entire community became overtaken by mob violence, with radical Muslims setting fire to, vandalizing, and destroying churches, cemeteries, and private residences. Fortunately, many of the Christian locals foresaw the attack and were able to evacuate the community and avoid violence. The two accused brothers, Rocky and Rajah, were taken into custody by authorities; however, this was less of an act of preemptive protection against mob violence but rather an arrest on the blasphemy charges. Although they were quickly acquitted and released due to insufficient evidence, Rocky and Rajah - as well as their elderly parents and Rocky’s wife and infant son - had no choice but to move to a shelter where they reside to this day, as individuals who have been absolved for blasphemy allegations still face stigma and vengeful treatment despite their innocence being proven. In one incident from recent years, Ahmadi Muslim man Muhammad Waqas was slashed to death by a novice police constable who was convinced of Waqas’ guilt despite his exoneration the previous year.<sup>13</sup> In 2024, Christian widow and school employee Musarrat Bibi - who had previously been charged with blasphemy alongside her colleague, school gardener Muhammad Sarmad, for following their superiors’ instructions to burn scrap paper which caused false rumors to spread that they were burning the Quran - shared that even though they were acquitted, she has not had her job reinstated and has instead been forced to relocate with her youngest daughter multiple times due to threats upon her life by individuals denying her innocence.<sup>14</sup>

The Committee raised concerns regarding the treatment of detained individuals and requested acknowledgment from Pakistan of endless reports “that many places of detention remain in dilapidated conditions, in which detainees lack access to adequate food, clean water, sanitation, sufficient space, lighting, heating, ventilation and medical care, and that individuals accused of blasphemy are allegedly subjected to poor conditions and remain in solitary confinement for extended periods”.<sup>15</sup> Pakistan responded, claiming that “solitary confinement for accused [individuals] is practiced to ensure safety and protection of the accused persons”. While it is reasonable to conclude that defendants facing blasphemy charges may be targeted for violence by other prison inmates who feel angered by the individual’s minority faith affiliation or perceived insult to Islam, it has been illustrated on numerous occasions that solitary confinement of accused blasphemers is accompanied by other forms of cruel treatment and that the Committee in its General Comment 20 of 1992 found that “prolonged solitary confinement of the detained or imprisoned person may amount to acts prohibited by [ICCPR] article 7 [prohibition of torture, or other cruel, inhuman or degrading treatment or punishment]”.<sup>16</sup>

Founder of an aid organization “Jesus World Mission” and Christian man, Zafar Bhatti, who has remained imprisoned since 2012 and was sentenced to death in 2022, is suffering severe deterioration of his physical health. In the two years since his application for bail on medical grounds was rejected, his heart condition has worsened significantly, and a visitor whom he received in May 2024 reported later that Zafar is unable to eat the typical prison diet and is instead only able to eat vegetables and very small quantities of water and other liquids. The visitor additionally noted that prison authorities had reportedly urged Zafar to make another appeal for bail on medical grounds in light of his dire health; however, “it is thought this latest advice may reflect a desire [among Pakistani officials] to avoid international scrutiny should his condition worsen in prison”.<sup>17</sup> Shafqat Emmanuel, who was convicted of blasphemy and sentenced to death along with his wife Shagufta Kausar in 2014, languished for 7 years in prison during which he reportedly was physically tortured and denied medical care for his pre-existing spinal cord injury which rendered him

<sup>11</sup> UN Human Rights Committee, *List of issues in relation to the second periodic report of Pakistan*, *CCPR/C/PAK/Q/2*, 29 November 2023.

<sup>12</sup> Jubilee Campaign, “Jubilee Campaign vehemently denounces violence against Pakistani Christians in Jaranwala following blasphemy accusations”, 25 August 2023.

<sup>13</sup> David Averre, “Man cleared of committing blasphemy in Pakistan is hacked to death ‘by policeman who refused to believe he was innocent’”, *Daily Mail*, 3 July 2021.

<sup>14</sup> Massimo Introvigne, “New False Blasphemy Charges in Pakistan”, *Bitter Winter*, 16 May 2023. ; Morning Star News, “Christian in Pakistan Loses Job, Home after False Charge”, 12 January 2024.

<sup>15</sup> *Supra note 11*.

<sup>16</sup> UN Human Rights Committee, *General Comment No. 20, HRI/GEN/1/Rev.9 (Vol. I)*, 10 March 1992.

<sup>17</sup> Church in Chains, *Zafar Bhatti*, updated 15 August 2024.

paraplegic.<sup>18</sup> After years of advocacy, Shafqat & Shagufta were acquitted of their blasphemy charges in 2021, reunited from their time separated in prison, and have since safely resettled with their children to a third country in Europe. Catholic man Nadeem Samson, who was accused of blasphemy, likely in an act of revenge by a man with whom he had recently had a property dispute, was imprisoned for more than four years (Nov 2017 - Jan 2022) during which he was physically tortured into making a coerced confession and was denied medical treatment for his kidney stones and impaired vision.<sup>19</sup>

Below are some select high-profile cases in which blasphemy accusations have resulted in the targeted party being sentenced to capital punishment:

<p>September 2001 - present  ≈ 23 years</p>	<p>In September 2001 authorities arrested Christian man <b>Anwar Kenneth</b> on accusations that he provided an objectionable and blasphemous response to Muslim religious cleric Haji Mehmood Zafar who sent Kenneth a letter asking questions about Christianity and expressing his disbelief of Jesus' crucifixion and resurrection. In his response, Kenneth cited the Bible, rejected Muhammad's prophethood and the Qur'an, and welcomed Zafar to convert to Christianity. The Additional Session Court in Lahore in July 2002 convicted Kenneth of "defaming the sacred name of The Holy Prophet" Muhammad and sentenced him to death and a fine of 500 thousand rupees, a judgment which was upheld by Lahore High Court in June 2014. Kenneth has remained on death row for more than 22 years and recently filed his final appeal.<sup>20</sup> In March 2024 in an unprecedented move, the Supreme Court instructed the Council of Islamic Ideology and two Christian bodies to provide written opinions regarding whether Kenneth's letter "falls within the definition of blasphemy" and is punishable by death.<sup>21</sup></p>
<p>July 2012 - present  ≈ 12 years</p>	<p>In July 2012 Rawalpindi authorities arrested Christian man <b>Zafar Bhatti</b> in connection to a report of blasphemous text messages, despite his not being named in the complaint. After Bhatti spent five years in pre-trial detention, in 2017 Judge Mohammad Yar charged him with blasphemy and sentenced him to life imprisonment. In October 2021, Justice Raja Shahid Mahmood Abbasi of the Lahore High Court Rawalpindi bench remanded Bhatti's case to the Rawalpindi District Court whose Judge Sahibzada Naqeeb Shehzad upheld Bhatti's charges and sentenced him to death in January 2022.<sup>22</sup> In January 2024, Bhatti's wife Nawab, 14 years his elder, was treated at hospital for high blood pressure and severe body aches; she recovered and visited him in prison in April, however her vision problems necessitate a cataract surgery in the near future. In May 2024, Bhatti's appeal hearing was again postponed as no judge was willing to preside over his case.<sup>23</sup></p>
<p>October 2013 - present  ≈ 11 years</p>	<p>In October 2013, 37-year-old Christian man <b>Asif Pervaiz</b> was detained after his former work supervisor filed a complaint against Pervaiz for allegedly sending blasphemous text messages. Pervaiz has repeatedly denied the charges, believing that his employer falsely accused him of blasphemy in an act of revenge for refusing to convert to Islam. In September 2020, Judge Qureshi of the Lahore Additional Sessions Court convicted Pervaiz of blasphemy and sentenced him to three years' imprisonment for "phone misuse", followed by execution for blasphemy.<sup>24</sup> In March 2024, Church in Chains reported that Pervaiz is suffering from kidney and heart issues, and an appeal hearing date remains yet to be scheduled.<sup>25</sup></p>
<p>June 2017 - present  ≈ 7 years</p>	<p>In June 2017, Christian motorcycle mechanic <b>Ashfaq Masih</b> was charged with committing blasphemy after he allegedly insulted the Prophet. A Muslim customer had demanded that the cost of his motorcycle repair be waived on the grounds that he (the customer) was Muslim, but Masih responded that he was a Christian and would require payment for his services. In July 2022, the Lahore High Court convicted Masih and sentenced him to death.<sup>26</sup> In October 2023</p>

<sup>18</sup> Jubilee Campaign, [Shagufta and Shafqat](#); Church in Chains, [Shagufta & Shafqat](#); United States Commission on International Religious Freedom (USCIRF), [Shafqat Emmanuel](#).

<sup>19</sup> Jubilee Campaign, [Nadeem Samson](#).

<sup>20</sup> Jubilee Campaign, ["Anwar Kenneth, a Christian Man on Death Row on Blasphemy Charges, Files Final Appeal Against the Death Sentence in Supreme Court of Pakistan"](#).

<sup>21</sup> Morning Star News, ["Hope for Christian 22 Years on Death Row for 'Blasphemy'"](#), 25 March 2024.; Jubilee Campaign, ["Urgent Call for Intervention in the Case of Pakistani Christian Anwar Kenneth, Unjustly Imprisoned 22 Years on Death Row for Expression of Religious Belief"](#), 3 April 2024.

<sup>22</sup> Church in Chains, [Zafar Bhatti](#), 11 March 2022.; Release International, [Prisoner Profile: Zafar Bhatti – Pakistan](#); Voice of the Martyrs, ["PAKISTAN: Zafar Bhatti Recovers from Heart Attack in Prison"](#), 24 September 2020.; British Asian Christian Association, ["Pakistan's longest serving blasphemy convict has been given death sentence"](#), 4 January 2022.

<sup>23</sup> Church in Chains, [Zafar Bhatti](#), updated 15 August 2024.

<sup>24</sup> Asad Hashim, ["Pakistani Christian sentenced to death for 'blasphemous texts'"](#), *Al Jazeera*, 8 September 2020.

<sup>25</sup> Church in Chains, [Asif Pervaiz](#), updated 18 April 2024.

<sup>26</sup> Shafique Khokhar, ["Lahore court sentences Christian man to death over false blasphemy charges"](#), *Asia News*, 7 November 2022.

	<p>Masih's wife Nabeela was granted a visit with her husband who appeared to be distressed at his prolonged imprisonment and "asked his family to urge the lawyer to start his case in court". Nabeela visits Masih frequently, deposits small funds into his jail account, and brings him dry food. Masih and Nabeela have a young daughter under the age of five, and Nabeela, who is unemployed, is currently relying on her father to support her and her child while Masih is imprisoned.<sup>27</sup></p>
<p>July 2019 - present ≈ 5 years</p>	<p>In June 2023, 22-year-old Christian man <b>Noman Masih</b> was convicted of blasphemy and sentenced to death by a court in Bahawalpur for allegedly storing blasphemous images of the Prophet on his cell phone which he shared to other WhatsApp users. Authorities initially arrested Masih in July 2019 when his cousin Sunny Waqas - detained for having physically printed the blasphemous caricatures - identified Masih as being the virtual distributor. Prosecutors could not find a witness to testify against Masih but forensic experts determined that the images were stored on and sent from Masih's phone. Defense attorneys have noted, however, that his phone could have been tampered with to fabricate incriminating evidence, as it had been in possession of the police for nearly three years.<sup>28</sup> In February 2024 it was reported that Masih had originally been charged twice for the same crime by authorities in two different cities Bahawalpur and Bahawalnagar -- an illegal act of double jeopardy - and that while he was acquitted on one case, his second conviction of blasphemy and death sentence remain in effect.<sup>29</sup> In July 2024, while still on death row, Masih passed his high school examination and registered with the Board of Intermediate and Secondary Education Bahawalpur.<sup>30</sup></p>
<p>March 2024 - present</p>	<p>In March 2024 a Punjab provincial court convicted 22-year-old Muslim university student <b>Junaid Munir</b> of blasphemy and sentenced him to death. The case dates back to 2022 when a complaint was lodged at the Federal Investigation Agency that the accused shared photos and videos online which contained derogatory remarks about the Prophet. Munir and his attorney Aslam Gujar have asserted innocence. Munir's father reported that he and the rest of Munir's immediate family have gone into hiding: "I cannot give you any information about my exact location, as some people in our village believe that I should also be killed as I am the father of a boy who allegedly insulted Islam's prophet. We are Muslims. We love our prophet No Muslim can even imagine to insult our beloved prophet, and my son is innocent".<sup>31</sup></p>
<p>June 2024 - present</p>	<p>In June 2024, 27-year-old Christian man <b>Ehsaan Masih</b> was sentenced to death for blasphemy by Judge Ziaullah Khan of the Sahiwal District Anti-Terrorism Court. The charges were raised against Masih one year earlier when he was accused of sharing videos to social media of the desecrated pages of the Quran which were used to implicate two Christian brothers, Rocky and Rajah, and incite mob violence in Jaranwala, Faisalabad. The arresting officer who arraigned Masih in August 2023 stated that he had posted "the hateful content at a sensitive time when authorities were already struggling to contain the violence".<sup>32</sup> In addition to capital punishment, Masih was sentenced to 7-year and 5-year terms of imprisonment on separate charges of blasphemy under the Prevention of Electronic Crimes Act and the Anti-Terrorism Act, respectively.<sup>33</sup></p>

There are many additional cases in which individuals are convicted of blasphemy and, while not sentenced to death, are issued various terms of imprisonment, as well as individuals who are currently detained or on bail awaiting formal charges or acquittal thereof. Many face the high likelihood of being sentenced to death as prescribed by the Penal Code, unless there is insufficient evidence or if the defendants are minors:

<p>2019 - present ≈ 5 years</p>	<p>In January 2023, the Bahawalpur bench of Lahore High Court imposed a bail to the amount of 4 million rupees upon poor 23-year-old Catholic man <b>Sunny Waqas</b> who was arrested in 2019 and charged with blasphemy for carrying printed photos of the Prophet in his book bag. The exorbitant bail amount far exceeds the maximum amount - 500,000 rupees - as is stipulated</p>
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<sup>27</sup> Church in Chains, [Ashfaq Masih](#), updated 18 April 2024.

<sup>28</sup> Massimo Introvigne, "Pakistan: Young Christian Sentenced to Death for Blasphemy", *Bitter Winter*, 7 June 2023.

<sup>29</sup> Christian Post, "Christian man acquitted of blasphemy but still remains on death row", 29 February 2024.

<sup>30</sup> Christian Daily, "Faith of Christian on death row in Pakistan shines in studies", 23 July 2024.

<sup>31</sup> Asim Tanveer, "Pakistani court sentences man to death and teenager to life in prison for insulting Islam's prophet", *Associated Press*, 11 March 2024.

<sup>32</sup> Asim Tanveer, "Pakistani court sentences Christian man to death for posting hateful content against Muslims", *Associated Press*, 2 July 2024.

<sup>33</sup> *Supra note 10*.

	<p>for blasphemy. At the time of his arrest in 2019, Waqas identified his cousin Noman Masih as the distributor of the images, and Masih has since been convicted of blasphemy and sentenced to death.<sup>34</sup> In February 2023, Waqas' lawyer Aneeqa Maria raised funds and paid the bail amount for his release from custody. She also revealed that during the bail hearing, the judge made the following comments: "Advocate Aneeqa Maria, you know that you can be burned alive for pursuing this case...People become very emotional when it comes to religious matters". The judge reportedly also said that Waqas should remain imprisoned "because he will be killed when he comes out of jail".<sup>35</sup></p>
<p>July 2021 - present ≈ 3 years</p>	<p>In July 2021, Pakistani Christian woman <b>Shagufta Kiran</b> was arrested without warrant by officers from Pakistan's Federal Investigation Agency (FIA) while she was inside her home; throughout the incident, the authorities had allegedly pushed Kiran, slapped her daughter, and threatened to shoot them. Kiran's husband Rafique Masih explained that his wife was arrested after she inadvertently forwarded a blasphemous message in a WhatsApp group in September 2020.<sup>36</sup> Shiraz Ahmed Farooqi, the admin of the WhatsApp group "Pure Discussion" and a member of "Islamist group Tehreek Tahaffuz-i-Namoos-Risalat (TTNR, Movement for Protection of Finality of Prophethood)", filed the case against Kiran. The Islamabad High Court rejected Kiran's petition for bail in April 2023, and her case hearings were frequently adjourned. In September 2024 Kiran was convicted of blasphemy by a Federal Investigation Agency court in Rawalpindi, Punjab, and sentenced to death. Her four children were devastated upon hearing the news of their mother's sentencing; one daughter, Nidaal, explained that "for the past four years, we have suffered because of my mother's case. She has been kept in an isolation cell since 2021".<sup>37</sup></p>
<p>March 2022 - present ≈ 2 years</p>	<p>In March 2022, twelve Pakistani authorities of the Federal Investigation Agency Gujranwala Circle physically assaulted 54-year-old Christian man <b>Fansan Shahid</b> in front of his wife and two adult children. A local Islamic cleric had filed a complaint against Shahid for allegedly sending blasphemous text messages, although Shahid's wife explained that he lost his phone in 2019 and his Facebook account could have been accessed by whomever acquired the device.<sup>38</sup> In January 2024 Justice Zafar Yab Chadhar of Gujranwala District Additional Sessions Court, Punjab, convicted Shahid of blasphemy and sentenced him to life imprisonment. Justice Chadhar announced additional convictions and sentences of imprisonment - to be served consecutively - including "causing communal arrest" (one-year term) and "promoting religious hatred on social media" (3-year term). Shahid's sister Sonia explained that "we were praying for [his] acquittal because he's innocent, but the verdict has shattered our hopes for justice".<sup>39</sup></p>
<p>September 2023 - present ≈ 1 year</p>	<p>In September 2023 married Christian couple <b>Shaukat Masih</b> (33) and wife <b>Kiran Shaukat</b> (28) were arrested after their children were accused of throwing torn pages of the Quran off of their rooftop. Shaukat and Kiran were detained for one month during which their three children - aged 13, 9, and 7 - were looked after by another Christian family.<sup>40</sup> Two children require specialized care, one for rickets and another for intellectual disabilities, and struggled being away from their parents. The couple was granted bail in October, and their lawyer Zahid Nazeer explained that the discarded materials which caused their blasphemy charge were not pages of the Quran but rather were Grade 9 Islamic Studies textbook pages. Nazeer did note that Shaukat and Kiran welcomed the news of their bail; however, Additional Sessions Judge Mian Shahid Javed "observed that the case needed further inquiry".<sup>41</sup></p>
<p>April 2024 - present</p>	<p>In March 2024, Christian high schooler 18-year-old <b>Ashbeel Baber Ghouri</b> was abruptly suspended from school over a WhatsApp argument with his Muslim classmate. His friend encouraged Ghouri to convert to Islam, but Ghouri responded that certain Islamic principles - including polygamy - contravened his Christian values. The friend accused him of "denigrating</p>

<sup>34</sup> Morning Star News, "[Excessive Bail Bond Required of Christian in Pakistan](#)", 20 February 2023.

<sup>35</sup> Morning Star News, "[Christian imprisoned for blasphemy in Pakistan released after 3 years, pays exorbitant bail](#)", 21 February 2023.

<sup>36</sup> Voice of the Persecuted, "[Pakistan: Another Christian woman accused of blasphemy for forwarding a text](#)"; Shafique Khokhar, "[Christian woman still jailed in Islamabad on blasphemy charges after more than nine months](#)"; *Asia News*, 19 May 2022.

<sup>37</sup> Jubilee Campaign Netherlands. ; Farrukh Saif, "[Christian Woman Sentenced to Death for Blasphemy in Pakistan: A Case of Shagufta Kiran](#)", *ECSPE*, 19 September 2024.

<sup>38</sup> Morning Star News, "[Christian in Pakistan Arrested, Tortured on Blasphemy Charges](#)", 21 March 2022.

<sup>39</sup> Morning Star News, "[Christian Sentenced to Life in Prison under Blasphemy Law](#)", 19 February 2024.

<sup>40</sup> Morning Star News, "[Christian Couple Jailed, Charged with Blasphemy in Pakistan](#)", 12 September 2023.

<sup>41</sup> Morning Star News, "[Christian Couple Accused of Blasphemy Win Bail in Pakistan](#)", 24 October 2023.

	Islamic religious practices and implying that Allah permits sinful behavior". Gossip about the quarrel reached the boys' school principal who, rather than mediate the dispute, reported Ghouri to police who subsequently arrested him and charged him with blasphemy. Ghouri has since been granted temporary bail contingent upon an upcoming case hearing, although no trial date has been set. He fears the death penalty and his family has gone into hiding, with his father quitting his job and his younger sister withdrawing from school. <sup>42</sup>
June 2024 - present	In June 2024 Christian woman <b>Stella Khawar</b> was arrested by authorities in Punjab's Sialkot District for "hurting religious sentiments of Muslims". The prior month, police reviewed previous FIRs of "unknown persons" writing blasphemous remarks on currency notes and shopping bags across the locality. Without proof, police reassigned these 'crimes' to implicate individuals at random, one of whom was Stella. Authorities raided her home and arrested her in front of her husband Khawar Shahzad and 4-year-old child, claiming they had 'concrete evidence', though no such proof was presented. Stella's request for bail was rejected not long after her arrest, and Khawar has been unable to visit his wife in jail. He also noted that the FIR for which Stella was charged dates back to August 2023, immediately following the Jaranwala incident; it is possible that police are taking advantage of heightened interfaith tensions to arrest innocent Christians for 'blasphemous conduct' to which they have no connection. Alternatively, it is possible that local radical Muslims are framing Christian residents for blasphemy, as was the case in the Jaranwala incident. Khawar expressed uncertainty regarding whether Stella's bail request - now escalated to sessions courts - will be accepted: "I don't know what will be the outcome due to the pressure being exerted by religious groups, but my priority right now is to keep my child safe from any harm". <sup>43</sup>
June 2024 - present	In June 2024 Christian rickshaw driver <b>Dennis Albert</b> was arrested and charged with "hurting religious sentiments" and "defiling the Quran" after he exited his vehicle and accidentally stepped on papers with Islamic phrases. Albert's brother explained that the only 'evidence' for his conduct was a single bystander, and his lawyer similarly called Albert's charges "ridiculous, to say the least". <sup>44</sup>
June 2024 - present	In June 2024 Christian ambulance driver and father of two young children, <b>Chand Shamaun</b> , was arrested and charged with blasphemy the day after he had a property inheritance dispute with his siblings; it has been suggested that one of these siblings accused Chand as an act of revenge for the argument the night prior. <sup>45</sup>
September 2024 - present	In September 2024 twin Christian brothers <b>Tabish Shahid</b> and <b>Yeshua Kalu Shahid</b> , 18, were accused of blasphemy after they visited a shrine on a holiday to watch Muslim festivities and reportedly began throwing papers in the air to imitate the celebratory activities. Being from a relatively poor and uneducated family, they are believed to be illiterate and likely did not realize the pages they tossed - which they tore out of a booklet - were covered in Quranic verses and were not ordinary pages. Tabish and Yeshua realized their actions were angering Muslim partygoers and fled the scene. Concurrently, police arrested the twins' mother Nazia and maternal uncle, releasing them only after the brothers surrendered to authorities. Tabish and Yeshua were charged with blasphemy, with another boy <b>Abid Saddique</b> being implicated in the incident. Abid's father Pastor Saddique, however, explained that his son could not have even been present at the scene as he was in post-surgery recovery. <sup>46</sup>

Pakistan claims that it has "undertaken efforts to prevent the misuse or abuse of blasphemy laws"; however, the Federal Investigation Agency reports 398 cases of false accusations of blasphemy between 2018 and 2023. Concurrently, although the number of acquittals for blasphemy accusations have increased, it is both incremental (0 in 2018; 0 in 2019; 1 in 2020; 0 in 2021; 2 in 2022; and 5 in 2023) and vastly disproportionate to the number of prosecutions (16 in 2018; 12 in 2019; 41 in 2020; 46 in 2021; 71 in 2022; and 74 in 2023). Moreover, as illustrated in the below chart provided by Pakistan, it appears that many blasphemy cases remain under trial years after the initial charges were filed, with only a small portion having been fully adjudicated. This is important to consider in regards to the government's other claim that "bail is granted to the under-trial prisoners expiring the one-year limit". In reality,

<sup>42</sup> Chandler Peterson, "Christian teenager persecuted in Punjab, charged with blasphemy", *Global Christian Relief*, 10 April 2024.

<sup>43</sup> Christian Daily International, "Pakistani Christian woman jailed on blasphemy charges of hurting Muslims sentiments", 7 June 2024.

<sup>44</sup> Billy Hallowell, "Christian Man Jailed on Blasphemy Charges After Accidentally Stepping on Pages of the Quran: Report", *CBN News*, 24 June 2024.

<sup>45</sup> Morning Star News, "Blasphemy Law Wielded against Christian in Pakistan", 24 June 2024.

<sup>46</sup> Centre for Legal Aid and Assistance & Settlement (CLAAS) & Voice of the Martyrs, "Pakistan: Twin Brothers Charged with Blasphemy", 3 September 2024.



individuals accused of blasphemy have remained in detention in legal limbo for years on end; this is only further exacerbated by the January 2023 decision of Parliament to make blasphemy a non-bailable offense altogether.

Year	Prosecutions	Convictions	Acquittals	Under Trial
2018	16	0	0	16
2019	12	1	0	11
2020	41	1	1	39
2021	46	3	0	43
2022	71	1	2	68
2023	74	1	5	68
Total	260	7	8	245

*Federal Investigation Agency Pakistan*

In its December 2022 State party report to the Human Rights Committee<sup>47</sup>, Pakistan notes that there “is no justification for a civilian - or any individual not in the position of authority - to decide to take the law into his/her own hands and punish or kill [an] alleged offender”. More recently, in August 2024 Council of Islamic Ideology Chairman Dr. Raghbir Hussain Naimi declared that mob violence against individuals accused of blasphemy “is not only un-Islamic but also contrary to the law of the land”. Dr. Naimi additionally criticized certain radical religious groups for “playing with the popular sentiment for political gains” and causing fear across more moderate, “saner elements of among religious circles”. Condemning the inflammation of interfaith tensions, Dr. Naimi asserted that “Sharia does not authorize any individual to take another person’s life”.<sup>48</sup> Indeed, there is a horrific pattern in which individuals accused of blasphemy are physically assaulted and/or lynched by other civilians - either before they are even able to have their case heard in court and any ‘evidence’ is presented, or following their case being dismissed due to insufficient evidence. With the exception of the August 2023 Jaranwala incident which Pakistan does reference in its May 2024 Replies to the Committee’s List of Issues, Pakistan does not respond to the Committee’s concerns regarding the pattern of blasphemy accusations and targeted mob violence and killings and its request for “additional information on the implementation and impact of the measures taken...to ensure that all those who incite or engage in violence against others based on allegations of blasphemy are brought to justice; please provide statistical data on the number of investigations, prosecutions and convictions for such practices”.<sup>49</sup>

May 2024	In May 2024 members of a radical Islamist group used mosque loudspeakers in Sargodha to broadcast false blasphemy accusations against elderly Christian resident <b>Nazir Masih</b> . A mob formed to exact revenge on Masih, brutally beating him in his neighborhood streets. The victim was transferred to the hospital in critical condition where he later passed away due to his severe injuries, and his family members were taken into protective custody by local authorities. The perpetrators injured seven civilians, and looted and set fire to Masih’s home and his son’s store. Videos of the incident circulated online, including one of Masih, visibly disheveled, being violently shoved to the ground, and another video of one of Masih’s family members restrained to a chair with his feet bound together. <sup>50</sup> A month after Masih’s death and days after the murder suspects were granted bail, Masih’s widow <b>Allah Rakhi Bibi</b> suffered a fatal cardiac arrest which doctors suspect resulted from stress and grief. <sup>51</sup>
June 2024	In June 2024, graphic videos circulated depicting a mob of radical Muslims in Peshawar dragging the naked corpse of a battered and bloodied man through the streets and burning it. The perpetrators, incensed by accusations that the man committed blasphemy, descended upon the police station where he was being held in protective custody, set fire to the building -

<sup>47</sup> *Supra note 5*.

<sup>48</sup> Kalbe Ali, “Religious groups misusing Islamic laws: Council of Islamic Ideology chief”, *Dawn*, 30 August 2024.

<sup>49</sup> *Supra note 11*.

<sup>50</sup> Abigail Hart, “Watch: Elderly Christian man persecuted by violent mob”, *Global Christian Relief*, 28 May 2024. ; International Christian Concern, “Mob Brutally Attacks Elderly Christian Man after False Blasphemy Claims Circulate”, 25 May 2024.

<sup>51</sup> Morning Star News, “Shattered Widow of Christian Lynched in Pakistan Dies”, 25 June 2024.

	injuring eight officers - removed the accused man and beat him to death. The victim was later identified as Muslim tourist <b>Muhammad Ismail</b> who was visiting Swat Valley for Eid-al-Adha observance. Police have initiated an investigation into the mob lynching with the aim of apprehending and prosecuting the attackers. <sup>52</sup>
August 2024	In August 2023 in Punjab province's Faisalabad district, a mob of radical Muslims attempted to kill 32-year-old Christian mother <b>Saima Masih</b> who had been accused of desecrating the Quran. Local authorities were able to intervene and rescue Masih before she could be beaten beyond recovery; however, they capitulated to the mob's demands of revenge and filed blasphemy charges against Masih, effectively transforming her protective custody into pre-trial detention. Masih asserts that her neighbor Muhammad Haider asked to borrow an empty sack and returned later in the day with the sack containing defiled pages of the Quran which Haider alleged were placed there by Masih. <sup>53</sup>
September 2024	In September 2024 an unnamed police officer in Quetta, Balochistan entered a police station pretending to be the relative of a Muslim man who was detained on blasphemy charges for allegedly speaking ill of the Prophet. Upon entry, the officer shot and killed the man, who had just recently been transferred to the more highly-fortified facility for safety reasons after he was the subject of vicious mob attacks - including grenade launches - upon the less secure police station where he was originally held. <sup>54</sup> Interestingly, the family members of the victim have condemned him for committing blasphemy and forgave his killer, explaining that they "have nothing to do with the dirty act of blasphemy" and "never hesitate to render our lives in the honor of the Holy Prophet (PBUH)". <sup>55</sup>
September 2024	In September 2024, police in Umerkot district, Sindh province, shot and killed medical doctor <b>Shahnawaz Kanbhar</b> , who had gone into hiding after being accused of posting derogatory remarks about the Prophet on social media. Local police chief Niaz Khoso claimed that Dr. Kanbhar was "killed just by chance" after he refused to stop when being pulled over by authorities and purportedly brandished a gun against them. Khoso also alleges that Dr. Kanbhar was not known to be a blasphemy suspect until after his death. However, the doctor's relatives believe that the authorities' narrative about an armed confrontation gone wrong resulting in Dr. Kanbhar's death is a "fake encounter" and that the victim was specifically targeted in connection with the accusations of blasphemy. <sup>56</sup> Sindh Inspector General of Police Ghulam Nabi Memon has since formed a special investigative committee to ascertain the "facts" of the incident. <sup>57</sup>

### **B. Abduction, forced religious conversions, and child marriage of faith minority girls**

Many cases are reported in Pakistan in which predominantly juvenile girls from religious minority communities are kidnapped, forcibly converted to Islam, and married off to Muslim men, usually the very same perpetrators of their abductions.<sup>58</sup> The perpetrators mostly manipulate the law and justice system to get away with their crimes due to the absence of legislation which deals with forced faith conversions, and the lack of enforcement of existing domestic law; this remains a key impediment in preventing such harmful and inhumane practices. Reports reveal that forced conversions and child marriages of minority girls are not only facilitated by religious clerics and police, but also validated by the courts. Although forced conversion constitutes an egregious violation of human rights and severely restricts the right to religious freedom, Pakistani authorities deny the existence of such practices and claim all conversions to Islam to be willful. The following incidents directly disprove these claims and constitute only a small fraction of the hundreds and thousands of cases of abductions, conversions, and child marriages.

<sup>52</sup> Mushtaq Ali, "Pakistan police hunt mob that lynched local tourist accused of blasphemy", *Reuters*, 21 June 2024. ; Agenzia Fides, "ASIA/PAKISTAN - Man lynched after accusation of blasphemy: an 'influencer' campaign aims to promote rule of law and peace", 21 June 2024.

<sup>53</sup> Morning Star News, "Mob Tries to Kill Christian Mother Accused of Blasphemy in Pakistan", 8 August 2024.

<sup>54</sup> Ayaz Gul & Ghulam Murtaza Zehri, "Pakistan police officer kills blasphemy suspect in custody", *Voice of America*, 12 September 2024. ; Abdul Sattar, "A Pakistani policeman shoots and kills a blasphemy suspect held at a police station", *Associated Press*, 12 September 2024.

<sup>55</sup> Saleem Shahid, "Family of Quetta blasphemy suspect forgives police officer accused of his killing", *Dawn*, 19 September 2024.

<sup>56</sup> Riaz Sohail, "Pakistan police shoot dead blasphemy suspect", *BBC*, 20 September 2024. ; Associated Press & The Guardian, "Police in southern Pakistan shoot dead blasphemy suspect", 19 September 2024.

<sup>57</sup> Imtiaz Ali & Nadir Guramani, "Body formed to probe 'facts' about killing of blasphemy suspect doctor in Mirpurkhas", *Dawn*, 20 September 2024.

<sup>58</sup> Jubilee Campaign, *Abduction, Conversion, & Child Marriage of Religious Minority Girls in Pakistan: 2022 Update*, January 2022. ; Jubilee Campaign, *Conversion Without Consent*, November 2022.

In its List of Issues, the Committee requested from Pakistan “information on the steps taken to harmonize federal legislation and ensure that the minimum age for marriage is set at 18 years for both girls and boys”<sup>59</sup> to which Pakistan responded that it is making an effort to standardize the minimum age of marriage, citing recent secular and Sharia court cases which found that minimum marital age requirements are not “against the Islamic Law” (*Farooq Omar Bhoja v. Federation*, Federal Shariat Court, 2020) and that underage marriage is “unlawful and the marriage contract void” (*Mumtaz Bibi v. Qasim*, Islamabad High Court, 2022).<sup>60</sup> In April 2024 Lahore High Court Justice Shaid Karim issued a judgment concluding that the Punjab Child Marriage Restraint Act as it exists is inherently discriminatory in setting the minimum marriageable age at 16 years and 18 years for girls and boys, respectively. Sparing no words, Judge Karim made his view on child marriage abundantly clear, stating that “we, as a nation, woefully lag behind in all major indicators, and half of our population cannot be lost to child-bearing at an early age while its potential remains untapped”.<sup>61</sup> Following Judge Karim’s judgment in which he explicitly ordered the Punjab government to draft an amended child marriage restraint legislation which abided by nondiscrimination, Sarah Ahmad, chair of the Child Protection & Welfare Bureau and member of the provincial assembly, introduced Punjab Child Marriage Restraint Act 2024 which would set the minimum age of marriage at 18 years regardless of sex/gender.<sup>62</sup> Individuals found guilty of facilitating child marriage would face a term of imprisonment between two and three years; additionally, the solemnization of marriages must be contingent upon a robust review of age documentation to ensure that no child is unlawfully married. In July 2024 the National Assembly ratified the Christian Marriage (Amendment) Act which would raise the minimum marriageable age to 18 years for both boys and girls. Having already been ratified by the Senate in 2023, the bill was sent to President Asif Ali Zardari, who signed it into law while in the presence of Federal Minister for Religious Affairs and Interfaith Harmony (MORA) Chaudhry Salik Hussain, and Secretary Minister MORA Zulfiquar Haider. While Christian leaders welcomed the new bill, they have additionally expressed concern that it would not provide sufficient protection for girls who are forcibly converted to Islam and therefore may not fall under jurisdiction of the new bill.<sup>63</sup>

The Committee requested that Pakistan “provide statistical data on the number of complaints, investigations, prosecutions and convictions in cases of early and forced marriage during the reporting period, and the remedies, including compensation, provided to victims and the protection services available to them”.<sup>64</sup> In response, Pakistan claimed that “a total of 74 cases of early and forced marriages were registered across the country during the reporting period. The victims of forced marriage are generally provided legal support as well as accommodation in the shelter homes and are also provided if required with rehabilitation and counseling services”.<sup>65</sup> In reality, hundreds of cases have transpired in recent years; in its 2024 Human Rights Observer, Centre for Social Justice Pakistan recorded 136 faith minority girl victims (110 Hindu and 26 Christians) between January and December 2023<sup>66</sup>, an increase from the 124 cases which were tallied between January and December 2022 and 78 such cases in 2021.<sup>67</sup> Additionally, such claims by Pakistan that the safety of girl victims is of utmost importance is a gross mischaracterization of the criminal justice system’s response to cases of abduction, forced conversion, and child marriage. In the majority of observed cases: (1) local authorities delay or refuse to register cases; (2) adequate legal support is not available to victims due to high fees and negligible of communication with the victims and their families; (3) rescued survivors are remanded to shelters in an act of blatant disregard for their requests to return to their family homes; (4) and there is no reported counseling provided to survivors who have been rescued and returned home.

<p><i>Chanda Maharaj</i> 15 years old Hindu</p>	<p>August 2022</p>	<p>In August 2022 in Sindh, Hindu teenager <b>Chanda Maharaj</b> was returning home with her sister one evening when she was abducted by Muslim man Shaman Magsi who had made previous repeated attempts to approach Chanda. Police only took action when international attention was paid to the case; police rescued Chanda in October 2022 and transferred her to a shelter. The same month, a court ordered her to return to Magsi as she had allegedly converted to Islam and married him willingly. Once again in her abuser’s captivity, she was rescued for a second time in December 2022 and returned to the shelter where she was previously held, despite her pleas to reunite with her family. In March 2024, a court decided that Chanda had reached a “biological age [that] makes her apt to be with her husband”, citing biographical records falsified by Magsi, according to which Chanda is</p>
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<sup>59</sup> *Supra* note 11.

<sup>60</sup> *Supra* note 4.

<sup>61</sup> Morning Star News, “Court in Pakistan Orders Change in Legal Marriage Age”, 24 April 2024.

<sup>62</sup> Morning Star News, “Bill in Pakistan Would Outlaw Child Marriages”, 1 May 2024.

<sup>63</sup> Kalbe Ali, “President Zardari signs amendment to Christian Marriage Act”, *Dawn*, 24 July 2024. ; Office of the President of Pakistan, “President signs Christian Marriage (Amend) Act 2024 into law”, 23 July 2024.

<sup>64</sup> *Supra* note 11.

<sup>65</sup> *Supra* note 4.

<sup>66</sup> Centre for Social Justice [Pakistan], *Human Rights Observer 2024*, March 2024.

<sup>67</sup> Centre for Social Justice [Pakistan], *Human Rights Observer 2023*, March 2023.

		supposedly now 18 years old; in reality, she is still a minor. Per this court ruling, Chanda has once again been forcibly returned to her 'husband'. <sup>68</sup>
<b>Jiji Bheel</b> 11 years old Hindu	August 2023	Hindu girl <b>Jiji Bheel</b> was abducted at gunpoint by a 40-year-old Muslim man more than triple her age, Azim Ghumrani. Fortunately, Sindh province authorities rescued Jiji and arrested Ghumrani; however, it is undetermined whether prosecution measures have been undertaken against Ghumrani, and Jiji has not been transferred to a shelter and instead is being held at a "female police facility". Authorities have claimed Jiji "left home of her own free will". <sup>69</sup>
<b>Shifa Razaqat</b> 14 years old Christian	November 2023	<b>Shifa Razaqat</b> was kidnapped from her home in Sheikhpura by neighbor woman Najma Liaquat, forcibly converted to Islam, and married off to 48-year-old Muslim man Syed Shabbar Ali Gillani. Shifa's parents provided her birth certificate listing her true age to the court only to be dismissed. Court officials presented Shifa's parents with a marriage certificate with the name of Muslim cleric Hafiz Fazal Dad Khan Chishti as the individual who performed the Islamic marriage solemnization. Hafiz Fazal has denied officiating such marriage, indicating that it was fabricated. The National Commission for Human Rights (NCHR) has repeatedly sent case details to authorities in Sheikhpura and Punjab, but no action has been taken to rescue Shifa. <sup>70</sup>
<b>Muskan Salman</b> 15 years old Christian	March 2024	In early 2024, Christian father Salman Masih reluctantly decided to remove his daughter <b>Muskan Salman</b> from school after she reported to him that a Muslim man regularly harassed her while she was traveling to class. Months later Muskan was abducted by Arsalan Ali, the man she identified earlier that year. Masih attempted to file a case to the police to rescue his daughter, but they provided him with a fabricated marriage certificate issued on the same day Muskan disappeared. The perpetrator is infamous in the area for conducting similar crimes. <sup>71</sup>
<b>Laiba Suhail</b> 10 years old Christian	February 2024	<b>Laiba Suhail</b> was kidnapped from her home in Ikhlaq, Faisalabad by four Muslim men under the leadership of Shaukat Shah, who has a notorious reputation for forcibly converting children to Islam, "coercing them to file court statements that they willfully converted and later taking them from shelter homes on the pretext of giving them religious education". Laiba was briefly recovered by a court and sent to a women's shelter; however, Shah visited the facility and took custody of Laiba, and police are now refusing to take action on the case. Authorities presented Laiba's father Suhail Masih with a statement she made in court that she accepted Islam "after being impressed with Islamic teachings". However, Masih stresses that this statement was coerced: "it is a blatant lie that my daughter has changed her faith willingly. Whatever little religious education she has is from the church's Sunday school. She has had no interaction with Muslims, because she used to stay at home all day long to take care of me and her mother". Laiba's parents suffer from health issues that make them both unable to work. <sup>72</sup>
<b>Roshni Shakeel</b> 13 years old Christian	March 2024	<b>Roshni Shakeel</b> was kidnapped from her home in Multan, Punjab province by Muslim man Muazzam Mazhar. Her parents filed a petition at Lahore High Court requesting her recovery. However, days later when Sital Mari Police Station authorities summoned Roshni and Mazhar to court, Justice Ali Zia Bajwa accepted coerced statements Roshni made - while she was standing just next to her captor - that she had left home, accepted Islam, and married of her own accord. Justice Bajwa "congratulated her on the marriage", and dismissed Roshni's parents "with a hand gesture" when they implored him to

<sup>68</sup> Marco Respinti, "Remember Chanda Maharai? Kidnapped Hindu Girl in Pakistan Delivered to Her Abductor", *Bitter Winter*, 15 March 2024.

<sup>69</sup> Marco Respinti, "What Will Happen to Jiji Bheel? 11-Year-Old Hindu Girl Kidnapped, Rescued, but Not Safe", *Bitter Winter*, 4 September 2023.

<sup>70</sup> Jubilee Campaign, "Pakistan Fails to Prevent Child Marriages and Sexual Exploitation of Christian and Hindu Girls", 14 September 2024.

<sup>71</sup> Morning Star News, "Girl Kidnapped, Forcibly Converted/Married in Pakistan", 25 April 2024.

<sup>72</sup> Morning Star News, "Christian Girl, 10, Kidnapped and Forcibly Converted in Pakistan", 11 March 2024.

		consider their daughter's "visibly underaged" appearance and inspect her authentic birth documentation provided by them to the court. <sup>73</sup> In May, Roshni escaped Mazhar and returned to her family, at which point she confirmed that he threatened to kill her if she testified against him. Roshni also revealed that Mazhar planned to traffic her to Saudi Arabia and sell her. The perpetrator has since filed an FIR against Roshni's parents in retaliation for their efforts to save their daughter. <sup>74</sup>
<b>Sania Ameen</b> 13 years old Christian	April 2024	<b>Sania Ameen</b> was kidnapped near her home in Punjab by a local Muslim man and two unidentified accomplices. Her father, Ameen Masih, received a distressing call from his other daughter informing him that Sania never returned home from her grocery trip. Bystanders reported that a local Muslim resident Saif Ali and two henchmen had stolen her off the streets. Sania's father filed a complaint with police who criticized him for being 'an irresponsible and thoughtless father' and claimed that Sania's conversion to Islam and marriage were consensual. Authorities closed the case without further action within three days, causing Ameen to submit another petition for charges against Ali; there have been no recent developments. <sup>75</sup>
<b>Alina Khalid</b> 14 years old Christian	June 2024	<b>Alina Khalid</b> disappeared from her home in Islamabad and her father, a Catholic sanitation worker, learned from neighbors that a local Muslim butcher abducted Alina, forced her to accept Islam, and married her. When her father reported the abduction to the police, he was told that she converted to Islam and married the butcher, Haider Ali. Authorities presented Alina's father with an Islamic marriage certificate incorrectly listing her age as 19 years. They filed an FIR only after 26 hours, allowing the perpetrator to escape with her. She continues to remain missing, and the failure of police in rescuing her has caused her ill mother - already ailing from diabetes and Hepatitis C - further trauma. <sup>76</sup>
<b>Saneha Javed</b> 18 years old Christian  <b>Neha Javed</b> 13 years old Christian	July 2024	In July 2024 Christian sisters <b>Saneha</b> and <b>Neha Javed</b> were kidnapped from their home in Punjab province by Muslim brothers Muhammad Zain, Muhammad Ali, and several unidentified accomplices. The sisters' parents were at home, but the perpetrators locked them in their room to stop them from intervening. The mother, Sumera Bibi, filed an FIR with police who declined to act; she and her husband received images of the girls' Muslim conversion and marriage certificates which incorrectly aged Saneha and Neha as 21 years and 19 years, respectively. Lahore High Court Justice Muhammad Tariq Nadeem in September 2024 ordered Kasur District police to rescue the sisters and file a case report. Saneha and Neha's father confronted the perpetrators' family but was attacked with an ax; he is recovering from this injury, but his pre-existing chronic illnesses have worsened as a result of his daughters' kidnapping and the attack upon him. <sup>77</sup>
<b>Fairy Shaukat</b> 12 years old Christian	August 2024	In August 2024 Catholic widow Parveen Shaukat registered her youngest daughter <b>Fairy Shaukat</b> as missing after she was sent to run errands at a grocery store and did not return. Parveen later heard from a neighbor who witnessed Muslim man Muhammad Asad kidnap Fairy. Parveen filed an FIR with authorities who remained uninterested in the case until Fairy's brothers received a WhatsApp message of an image of an Islamic marriage certificate with Fairy's name on it. The delayed response of the police allowed Asad to flee from the community and take Fairy with him. <sup>78</sup>
<b>Meena Lohar</b> 7th grader	September 2024	Hindu teenager <b>Meena Lohar</b> was abducted and forcibly married to "a Muslim youth" named Asif Kanhabar after converting to Islam. There have

<sup>73</sup> Morning Star News, "Kidnapper Wins Custody of 13-Year-Old Girl, Sources Say", 27 March 2024.

<sup>74</sup> The Friday Times, "Minor Christian Girl Approaches Multan Court Seeking Action Against 'Abductors'", 24 May 2024.

<sup>75</sup> James Jacob, "13-year-old Christian girl abducted, forced into Islamic marriage in Pakistan", *The Christian Post*, 30 April 2024.

<sup>76</sup> Christian Daily International, "Christian girl, 14, taken for sham conversion/marriage in Pakistan", 9 July 2024.

<sup>77</sup> Morning Star News, "Court Orders Recovery of Sisters Forcibly Converted, Married", 13 September 2024.

<sup>78</sup> Christian Daily International, "Christian girl, 12, forcibly converted/married in Pakistan", 28 August 2024.

Hindu		been no further updates on the case. <sup>79</sup>
<i>Diya Iftikhar</i> 16 years old Christian	September 2024	In September 2024 Christian teenager <b>Diya Iftikhar</b> was kidnapped from her home in Jaranwala, Faisalabad while her parents were attending a wedding. Witnesses reported that the armed perpetrator, Muslim man Ghazaal Jutt, and his two brothers and accomplices Afzal and Ramzan forced Diya into a white van. Diya's parents received a video of her claiming to have married Ghazaal and accepted Islam willingly; however, Diya previously complained to her parents that Ghazaal had on multiple occasions harassed her while she walked to tutoring sessions. Diya had similarly criticized Ghazaal for his involvement in the Jaranwala mob incident against the Christian community last August. Diya's parents have unsuccessfully petitioned authorities to intervene for their daughter's rescue, and they are concerned about the safety of their four other daughters. <sup>80</sup>

In its reply to the Committee, Pakistan claims that it "takes a proactive approach in eliminating all forms of violence against women including psychological, physical and sexual abuse, rape, burning and acid attacks, harassment, early and forced marriages, forced conversions, kidnapping and abduction, murder, and honor killing among others".<sup>81</sup> Ironically, however, statistics from its own National Police Bureau - which Pakistan boasts as evidence of its commitment to addressing violence against women - illustrate that the number of convictions is vastly disproportionate to the number of cases registered. In fact, the annual number of convictions has decreased over the past two years despite the number of filed cases stabilizing around 2500:

Year	# of Cases Registered	# of Convictions
2020	2,172	76
2021	2,692	100
2022	2,698	50
2023	2,442	25
Total	10,004	251

*National Police Bureau Pakistan*

### C. Acts of violence and discrimination against faith minorities unrelated to incidents of blasphemy

There have been numerous additional cases of violence targeting Christians which are not related to accusations, convictions, and acquittals of blasphemy. These incidents, though not connected to each other, often exhibit commonalities: revengeful and retaliative motivations; sexual violence; severe corporal punishment for perceived transgressions or insubordination in the workplace; etc.

November 2023	20-year-old Christian youth <b>Farhan UI Qamar</b> was shot and killed in his home by Muslim man Muhammad Zubair. Zubair held Qamar's family hostage at gunpoint, preventing them from assisting their dying relative. Qamar and Zubair had a minor dispute the prior day, and Zubair has a reputation for being hateful towards Christians and Jews. <sup>82</sup>
January 2024	Pregnant Christian woman <b>Rakhil Nadeem Masih</b> was raped by a Muslim coworker at a brick kiln in Punjab, causing her to suffer a miscarriage of the child which she had nearly carried to full term. To file an FIR, police required Masih's husband to provide a "medico-legal certificate"; however they rejected the document as it was not signed by the doctor. Masih stated: "I later came to know that both the police and the doctor have been influenced by the

<sup>79</sup> News Intervention Bureau, "Radical Islamists abduct, convert & marry off three minor girls to their abductors in Pakistan", 18 September 2024.

<sup>80</sup> Morning Star News, "Christian 16-Year-Old Girl in Pakistan Kidnapped, Converted", 24 September 2024.

<sup>81</sup> *Supra* note 4.

<sup>82</sup> Morning Star News, "Religious Hatred Motivated Murder in Pakistan, Father Says", 24 November 2023.

	Muslim owner of the brick kiln, Chaudhry Abdul Rehman”. <sup>83</sup>
February 2024	Christian brothers <b>Azam and Nadeem Masih</b> were kidnapped and physically tortured into accepting Islam by Naseem Shah and a group of unidentified men who threatened the victims with death. They forced Azam and Nadeem to record a video claiming they converted to Islam willingly. Authorities arrested and charged the perpetrators with abduction; “theft with intention to cause injury or death”; “threatening death or grievous injury”; “causing injury to extort a confession”; and “acts committed by several persons in furtherance of common intention”. <sup>84</sup>
February 2024	Christian sisters-in-law <b>Rukhsana Bibi</b> and <b>Asifa Bibi</b> relieved themselves in a local field and were attacked with an ax by landowner, Muslim man Abdul Rauf, who attempted to sexually assault Rukhsana. Police procrastinated registering an FIR for three days and only charged Rauf with attempted rape and assault (bailable offenses) rather than aggravated attempted assault (non-bailable offense). Rauf has absconded, and the sisters have received treatment for their injuries. <sup>85</sup>
February 2024	A group of Muslim men - Zaman Butt, Anas Yaseen, Adil Abdul Rehman, Ashraf Inayat Ullah, and two others - raided a market in Gujranwala, Punjab on motorcycles, shooting at a group of Christians. 14-year-old Christian boy <b>Sunil Masih</b> died of gunshot wounds, and another Christian boy <b>Jamshed</b> sustained minor injuries. The attackers were not apprehended. <sup>86</sup>
February 2024	A group of armed radical Muslims led by Imran Yousef shot indiscriminately and launched fuel bombs at the homes of Christian villagers in Punjab as retaliation for the Christian community’s construction of a church. No injuries or deaths occurred; however, the attack caused structural damage to the homes. The assailants fled the scene and were not arrested. <sup>87</sup>
April 2024	Christian farmhand <b>Waqas Masih</b> was beaten and shot by his Muslim employers Luqman and Imran Jutt after he requested his wages so that he could purchase Easter presents for his children. Masih was also attacked in a similar manner in December when he asked for his payment to buy Christmas gifts. Masih was transported to the hospital for treatment; meanwhile, his attackers were granted pre-arrest bail. <sup>88</sup>
May 2024	Christian sanitation worker and father of four, <b>Yasir Masih</b> , was beaten, restrained to a chair, and left outside in the extreme heat by his Muslim employer Malik Khadim Hussain and his family after he delayed cleaning their home. Masih eventually escaped and police detained Hussain and his two sons, although other perpetrators have not been apprehended. <sup>89</sup>
May 2024	24-year-old Christian mother of two, <b>Saima Bibi</b> , was serving tea to customers in Punjab when her Muslim employer Muhammad Mustafa became incensed that she was not cutting fodder for his cattle. Mustafa pushed Bibi towards the chaff cutter, causing her to fall and hit her head on the machine which lacerated skin on her ears and head as well as injured her eye. Bibi’s husband, who worked with her, immediately took her to the hospital where she is recovering. Meanwhile, Mustafa has fled the police. <sup>90</sup>
June 2024	18-year-old Catholic boy <b>Waqas Salamat</b> was tortured to death by his Muslim employer at a plastic bottle manufacturing factory in Lahore. Salamat had stopped attending work as he was looking for employment elsewhere; factory owner Muhammad Saleem conspired with his son Umar and three Muslim employees to baselessly accuse Salamat of grand theft and hold him hostage. Salamat’s parents asserted his innocence but offered to pay Saleem to secure their son’s release; however, Saleem and the other three Muslim men restrained Salamat and tortured him to death with plastic pipes and electric shocks. The perpetrators have shut down

<sup>83</sup> Christian Post, “[Unborn baby killed as Christian mother beaten by co-worker: police refuse to prosecute](#)”, 18 January 2024.

<sup>84</sup> Barnabas Aid, “[Pakistani Christian Brothers Tortured Into Reciting Islamic Creed](#)”, 5 March 2024.

<sup>85</sup> Renate Farkas, “[Two Christian women assaulted in Pakistan](#)”, *Stand for Christians*, 7 February 2024.

<sup>86</sup> Church in Chains, “[PAKISTAN: 14-year-old Christian boy shot dead by Muslim gunmen](#)”, 13 February 2024.

<sup>87</sup> Morning Star News, “[Christian Homes in Pakistan Hit with Gunshot, Fuel Bombs](#)”, 15 February 2024.

<sup>88</sup> Christian Daily International, “[Christian laborer in Pakistan shot for requesting wages](#)”, 5 April 2024.

<sup>89</sup> Morning Star News, “[Christian Sanitation Worker Tortured in Pakistan](#)”, 29 May 2024.

<sup>90</sup> Voice of the Martyrs, “[PAKISTAN: Christian Woman Injured and Denied Justice](#)”, 21 May 2024.

	the factory and fled the area to avoid arrest. <sup>91</sup>
July 2024	Christian mother Sonia Mehboob reported that her 15-year-old Christian daughter was attacked while returning from the store by two Muslim men who forced her to ingest drug-laced water and subsequently raped her while she was unconscious. Sonia searched for her daughter when she did not return from her errand and she witnessed two local Muslim men Muhammad Amjad and Fahad Nasir walking out of their home alongside the girl who was still under the effect of the drugs, unable to talk and struggling to walk. She was transported to the hospital where doctors confirmed through medical testing that she had been raped; she also had injuries on her body which indicate she was bitten and tortured. Police have refused to apprehend the two perpetrators. <sup>92</sup>
July 2024	Catholic father of four children between the ages of 10 years and 18 months, <b>Marshall Masih</b> , was attacked in his home early one morning by Muslim neighbors including Muhammad Shani and Azam Ali. The perpetrators held the entire family hostage and shot Masih 16 times, killing him in front of his wife and children. Previously, Masih filed an FIR against Shani for harassing local Christian women. Authorities have not made any arrests in connection with Masih's murder. <sup>93</sup>

#### IV. Recommendations for the State Party

1. Repeal all laws criminalizing blasphemy and other offenses against religion, and immediately release individuals imprisoned on such charges. Moreover, abolish the death penalty for blasphemy or any offense against religion.
2. Ensure the right to a prompt and fair trial for all persons charged with blasphemy or offenses against religion. Moreover, guarantee that thorough investigations of acts of violence based on blasphemy allegations are conducted, and the perpetrators are prosecuted and duly punished.
3. Establish a highly empowered independent Commission of Inquiry under the Inquiry Commission Act of 1956 to investigate issues and cases under Sections 295A, B, and C, and 298A, B, and C. This commission should determine the nature and scale of abuse, identify contributing factors, and propose remedies. It should also make recommendations for legal, administrative, and educational measures to prevent misuse of the blasphemy laws.
4. Upgrade Standard Operating Procedures (SOPs) for the police to effectively address mob violence. Ensure that perpetrators of blasphemy law abuse and those inciting violence are prosecuted and punished.
5. Investigate the role of the Federal Investigation Agency (FIA) in registering false cases and reconsider the involvement of Anti-Terrorism Courts in blasphemy and mob violence cases. Trials for such cases should be conducted in regular courts with guarantees for a fair trial.
6. Implement concrete measures to protect the freedom of all individuals to adopt a religion or belief of their choice, including enhancing law enforcement's capacity to prevent and respond to forced religious conversions, particularly among children and religious minorities.
7. Amend existing marriage laws to standardize the legal age for marriage at 18 years for both Muslims and religious minorities.
8. Establish a Parliamentary Committee to address forced conversions and introduce preventive legislation to criminalize forced faith conversions. Ensure that marriage or bigamy linked to conversions is subject to verification by the court.
9. Enforce existing legal safeguards against child and forced marriages, ensuring that police, administrative, and judicial officers bring perpetrators and abettors involved in forced faith conversions to justice.

<sup>91</sup> Morning Star News, "[Muslim Employer in Pakistan Tortures Christian Worker to Death](#)", 11 June 2024.

<sup>92</sup> Morning Star News, "[Family Seeks Justice after Rape of 15-Year-Old Girl in Pakistan](#)", 30 July 2024.

<sup>93</sup> Release International, "[Christian gunned down by Muslims in Pakistan](#)", 18 July 2024.