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**STATUS OF HUMAN RIGHTS IN THE FEDERAL REPUBLIC OF NIGERIA  
FOR THE 45<sup>TH</sup> SESSION OF THE  
UNIVERSAL PERIODIC REVIEW**

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## **Status of Human Rights in Nigeria for the 45<sup>th</sup> Session of the Universal Periodic Review**

### **Introduction**

1. The European Centre for Law and Justice (ECLJ) is an international, non-governmental organization dedicated to promoting and protecting human rights around the world. The ECLJ also holds Special Consultative status before the United Nations Economic and Social Council. The purpose of this report is to raise concerns regarding human rights violations in the Federal Republic of Nigeria (Nigeria) for the 45th Session of the Universal Periodic Review (UPR).

### **Background**

2. Nigeria is located in western Africa and has an estimated population of 230.8 million people.<sup>1</sup> The majority of the country is Muslim with approximately 53.5% of the population identifying as Muslim, 10.6% as Roman Catholic, 35.3% as Christian, and 0.6% as other.<sup>2</sup> Nigeria is ranked as the 6th most dangerous country for Christians to live.<sup>3</sup> This ranking stems from the fact that Islamic extremist groups such as Boko Haram and the Fulani herdsmen continue to attack Christian communities, resulting in loss of life and property.<sup>4</sup> In fact, 90% of worldwide Christian martyrdom occurs in Nigeria, with at least one Christian being killed for their faith every two hours.

3. Nigeria's last UPR was held on November 6, 2018.<sup>5</sup> As a result of the review, Nigeria received 290 recommendations, 240 of which Nigeria supported.<sup>6</sup> It was recommended by Kenya, and supported by Nigeria, that the government "[c]ontinue the measures to increase the freedom of religion and belief for all."<sup>7</sup> It was also recommended by China, and supported by Nigeria, that the government "[c]ontinue to fight terrorism and extremism and create a safe and stable environment for the promotion and protection of human rights."<sup>8</sup>

### **Legal Framework**

#### *Religious Persecution*

4. Under Article 38 sec. 1 of the Constitution of Nigeria:

Every person shall be entitled to freedom of thought, conscience and religion, including freedom to change his religion or belief, and freedom (either alone or in community with others, and in public or in private) to manifest and propagate his religion or belief in worship, teaching, practice and observance.<sup>9</sup>

5. Nigeria is also party to the International Covenant on Civil and Political Rights (ICCPR).<sup>10</sup> Under Article 18 of the ICCPR:

1. 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.

2. No one shall be subject to coercion which would impair his freedom to have or to adopt a religion or belief of his choice.<sup>11</sup>

6. Moreover, under Article 27 of the ICCPR:

In those States in which ethnic, religious or linguistic minorities exist, persons belonging to such minorities shall not be denied the right, in community with the other members of their group, to enjoy their own culture, to profess and practise their own religion, or to use their own language.<sup>12</sup>

### **Religious Persecution**

7. Since 2009, more than 52,250 Christians have been killed in Nigeria at the hands of Islamic militants.<sup>13</sup> During this same period, more than 18,000 churches and 2,200 schools have been burned down.<sup>14</sup> This violence has also resulted in five million Christians being forced from their homes and living in refugee camps.<sup>15</sup> Tragically, there is no sign of the violence stopping anytime soon, and in fact, reports show that conditions are worsening in Nigeria.<sup>16</sup>

8. In 2022, Christians in Nigeria accounted for 90% of all Christians who were killed because of their faith.<sup>17</sup> This represents a 10% increase from 2021 when Christians in Nigeria accounted for 80% of Christians murdered worldwide.<sup>18</sup> Additionally, it has now been reported that 2,150 Christians have been killed in Nigeria between January 1 and June 12, 2023, by “non-state actors/Nigerian Government backed Islamic Jihadists.”<sup>19</sup> Over 1,400 others were abducted during that time, of which an estimated 140 will not return alive.<sup>20</sup>

9. A human rights organization reported that no fewer than 700 defenseless Christians were killed at the hands of Fulani herdsmen in May 2023 alone.<sup>21</sup> Additionally, the report noted that between April 12, 2023 and June 12, 2023, no fewer than 1,100 Christians were killed by Islamic jihadist groups.<sup>22</sup> During that same period, the Islamic jihadists also destroyed 100 churches and attacked twenty pastors.<sup>23</sup> These numbers represent an average of seventeen Christians being killed each day.<sup>24</sup> With human rights atrocities occurring hourly in Nigeria, the paragraphs below detail just some of the tragic deaths since the beginning of the year.

10. On June 17, 2023, Father Marcellus Nwaohuocha, a member of the Missionary Oblates of Mary Immaculate, was abducted after gunmen attacked St. Paul Bomo Parish in the Archdiocese of Jos in Nigeria.<sup>25</sup> Father Klaver, the order’s superior in Nigeria, said that his whereabouts were unknown.<sup>26</sup> Three days later on June 20, 2023, Father Marcellus was released from captivity after being tortured and had received deep wounds on his head.<sup>27</sup>

11. On June 11, 2023, Father Jeremiah Yakubu, a priest from Holy Trinity Parish in Karku, was abducted from the rectory in the middle of the night.<sup>28</sup> Thankfully, he was released the next day.<sup>29</sup>

12. On June 7, 2023, a Catholic priest was shot and killed while driving through Benin, Edo in Nigeria.<sup>30</sup> He was on his way back to his place of assignment, when he was attacked by gunmen.<sup>31</sup> His body was found by a street in Edo State, and it was reported that the gunmen shot him in the back and riddled his body with bullets.<sup>32</sup>

13. Forty-six Christians were killed over a two-day period in June 2023 by Fulani herdsmen in Benue State in southeastern Nigeria.<sup>33</sup> On June 3, 2023 Fulani herdsmen attacked Imande Mbakange village in the early morning hours and killed twenty-eight Christians.<sup>34</sup> The very next day, Fulani herdsmen killed eighteen Christians in the villages of Michihe, Achamegh, and Mbagene.<sup>35</sup>

14. On June 2, 2023, Father Stanislaus Mbamara, a Catholic priest who was ministering in the Nnewi Diocese of Nigeria, was kidnapped and later released.<sup>36</sup>

15. On May 24, 2023, several communities near Guma Local Government Area of Benue State were attacked by Fulani herdsmen.<sup>37</sup> Many were killed, villages were destroyed, and thousands of Christians were displaced from their homes.<sup>38</sup>

16. On May 21, 2023, Fulani herdsmen reportedly attacked the village of Iye in Guma Local Government Area and killed at least eighteen people.<sup>39</sup> Among those killed were four Nigerian soldiers who were responding to the attack.<sup>40</sup>

17. On May 19, 2021, the parish priest of Christ the King, Father Jude Kingsley Maduka, was abducted while on a trip to visit a new chapel for Eucharistic adoration in the Ogii village of Okigwe.<sup>41</sup> Thankfully, he was released a few days later on May 22, 2023.<sup>42</sup>

18. On May 16, 2023, Fulani herdsmen began attacking Christian villages in Mangu, central Nigeria.<sup>43</sup> These attacks resulted in the deaths of at least 125 people.<sup>44</sup> One survivor described the horror: “We started hearing gunshots in the night at around midnight. My grandmother and the girl who stays with me were killed, along with my first born. My 5-year-old has been seriously wounded, too. He’s in great pain.”<sup>45</sup>

19. On May 11, 2023, Fulani herdsmen attacked a set of villages and killed twenty-eight Christians.<sup>46</sup> This attack came just two days after Fulani herdsmen killed more than twenty-two Christians in villages across Nigeria.<sup>47</sup>

20. On May 8, 2023, Roman Catholic catechist Dominic Dajo and his wife, were killed along with dozens of other Christians by Fulani herdsmen.<sup>48</sup> The massacre occurred at St. Peter Catholic Church in Guma County.<sup>49</sup> That same day, Fulani herdsmen attacked three other villages in the county.<sup>50</sup>

21. On May 7, 2023, forty-two Christians were taken captive after armed gunmen attacked a church during a Sunday morning service in Kaduna State.<sup>51</sup> The attackers later released twenty-two of the hostages, but the remaining twenty remain captive.<sup>52</sup> The secretary general of the Christian Associated of Nigeria, Reverend Joseph Hayab, issued a statement on the attack:

Up till now, the people are with the bandits. The bandits have not called. The [remaining] in fear have left the village. The bandits for some reason just selected some and allowed them to come back. Sometimes when they pick a

large number like that, they select those who they think are strong enough that they can use to bargain for money.<sup>53</sup>

22. Over an eleven-day period in April 2023, Fulani herdsmen killed eighteen people in predominately Christian villages in Plateau State.<sup>54</sup> In one of the attacks, Rev. Gwong Dachollom was ambushed, shot, and cut with a machete.<sup>55</sup> Thankfully, he was sent to a hospital to receive medical attention.<sup>56</sup> In another attack, Fulani militants shot and killed a Christian who was attending the burial of six Christians who were killed in a separate attack on April 25, 2023.<sup>57</sup>

23. Between April 16 and 19, 2023, Fulani herdsmen attacked and killed twelve people in predominately Christian villages in central Nigeria.<sup>58</sup> During this attack, Fulani herdsmen also burned down the house of a pastor along with dozens of other homes belonging to Christians.<sup>59</sup> One resident described the bloodshed in these words: “The victims were murdered like animals, while some inhabitants of these communities are still missing . . . . Valuables worth millions of naira have been lost. More than 50 houses have been burnt down to ashes, and food and cash crops were burnt to ashes, too.”<sup>60</sup>

24. On April 15, 2023, Islamic extremists attacked the Runji village in Zangon Kataf Local Government Area (LGA) and proceeded to kill thirty-three people, fourteen of whom were children.<sup>61</sup> One of the victims was a five-year-old boy who was reported to have been beheaded and other bodies were found to be burned beyond recognition.<sup>62</sup> The victims were reportedly buried in a mass grave.<sup>63</sup> One man who was interviewed about the attack reported that forty houses were burned down and that he had no doubt that the attackers were Fulani herdsmen.<sup>64</sup>

25. In April 2023, more than ninety-four Christians were killed in a series of attacks that took place during Holy Week in north-central Nigeria.<sup>65</sup> In one of the attacks, armed men attacked a Pentecostal church during a Palm Sunday service and killed a young boy before kidnapping the pastor and other worshippers.<sup>66</sup> Just three days later, gunmen killed fifty people in a predominately Catholic village.<sup>67</sup> Then, on Good Friday, Muslim extremists attacked an elementary school that was providing shelter for more than 100 displaced Christians, and resulted in the deaths of forty-three people and another forty people injured.<sup>68</sup>

26. On April 5, 2023, Fulani herdsmen were suspected to have killed at least forty-six villagers who were attending a funeral in the village of Umogidi in Benue State of central northern Nigeria.<sup>69</sup> The villagers were mourning the death of three other people who had been killed just one day earlier.<sup>70</sup> Many villagers were unaccounted for, so the death toll may be even higher.<sup>71</sup>

27. On March 23, 2023, Musa Mairimi, the pastor of Evangelical Church Wining All, was killed while at his home.<sup>72</sup> His wife was also abducted during the attack.<sup>73</sup>

28. In two separate attacks on March 10 and March 14, 2023, Fulani herdsmen and other terrorists killed a total of twenty-seven Christians in Langson and Ungwan Wakili villages of Kaduna State.<sup>74</sup> The attack on Ungwan Wakili started in the evening and lasted for about forty minutes before the terrorists began to retreat.<sup>75</sup>

29. In a separate attack on March 10, 2023, attackers raided a Baptist pastor’s home and killed the pastor and his son before abducting four of the family members.<sup>76</sup> A few hours after

the attack, the wife was released.<sup>77</sup> The attackers demanded a ransom of five million naira (\$10,8410) to release the remaining family members.<sup>78</sup>

30. In the early hours of January 22, 2023, Fulani herdsmen ambushed a predominately Christian village in Tafawa Balewa County of Bauchi State.<sup>79</sup> The attack resulted in the death of five Christians, and one Christian man was taken and held captive.<sup>80</sup> Just two days earlier, on January 20, 2023, Fulani herdsmen attacked and killed twelve Christians from Abagena, a predominately Christian community located in Benue State of central Nigeria.<sup>81</sup>

31. On January 22, 2023, five Christians were murdered and one was abducted by Fulani herdsmen in Bauchi State.<sup>82</sup>

32. On January 20, 2023, Fulani herdsmen killed twelve Christians in Benue state.<sup>83</sup>

33. Between January 17 and 19, 2023, Fulani herdsmen killed five Christians in Kaduna State and abducted four Christians in Enugu State.<sup>84</sup>

34. On January 15, 2023, Reverend Father Isaac Achi was burned to death in his living quarters and another priest, Collins Omeh, was shot by Fulani herdsmen at St. Peter and Paul Catholic Church in Kafin-Koro in Niger State.<sup>85</sup> That same day, Fulani herdsmen shot a pastor and abducted twenty-five Christians during a worship service at New Life for All Church in Katsina State.<sup>86</sup> Nine of the abducted Christians escaped.<sup>87</sup>

35. Although many abducted Christians either escape or are killed, others remain captive. Leah Sharibu is one of those Christians. Leah was just fourteen years old when she and 110 other girls were abducted by Boko Haram from the Government Girls' Science and Technical College in northeast Nigeria.<sup>88</sup> Five girls were killed, the others were released, and Leah remained captive.<sup>89</sup> While the other girls were released, Leah was held because she refused to renounce her Christian faith.<sup>90</sup> Leah turned twenty years old on May 14, 2023, and she has still not been set free.<sup>91</sup> It is reported that Leah has been married off to an abductor and is the mother of two children.<sup>92</sup> However, because Leah has not been heard from in years, the only information of her well-being or whereabouts comes from the reports of others who have escaped captivity.<sup>93</sup>

## Recommendations

36. As demonstrated above, Nigeria continues to fail to protect innocent Christians. Every day there are new reports of Christians being attacked, killed, and their villages being burned down. It is of utmost importance that Nigeria take immediate steps to protect Christians and stop the senseless violence. We also ask that Nigeria engage with the international community to help in this endeavor. Additionally, in order for Christians to have a future in Nigeria, the government must provide aid and support so that displaced victims can safely return to their homes.

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<sup>1</sup> *Nigeria*, THE WORLD FACTBOOK, <https://www.cia.gov/the-world-factbook/countries/nigeria/> (May 2, 2023).

<sup>2</sup> *Id.*

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- <sup>3</sup> *World Watch List 2023*, OPEN DOORS, [https://www.opendoorsus.org/en-US/persecution/countries/?gclid=CjwKCAjw3ueiBhBmEiwA4BhspN4IGblMAGQrlPerPUoXSwhIUng-kMCs0C\\_21\\_AoCEZTB8lrCyzHmRoCDgYQAvD\\_BwE](https://www.opendoorsus.org/en-US/persecution/countries/?gclid=CjwKCAjw3ueiBhBmEiwA4BhspN4IGblMAGQrlPerPUoXSwhIUng-kMCs0C_21_AoCEZTB8lrCyzHmRoCDgYQAvD_BwE) (last visited May 9, 2023).
- <sup>4</sup> *Nigeria*, OPEN DOORS, <https://www.opendoorsuk.org/persecution/world-watch-list/nigeria/> (last visited May 9, 2023).
- <sup>5</sup> *Universal Periodic Review Third Cycle – Nigeria*, OHCHR, <https://www.ohchr.org/en/hr-bodies/upr/n-gindex> (last visited Jan. 4, 2023).
- <sup>6</sup> *Nigeria Infographic 31st*, OHCHR, [https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session31/NG/Nigeria\\_Infographic\\_31st.pdf](https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session31/NG/Nigeria_Infographic_31st.pdf) (last visited Mar. 20, 2023).
- <sup>7</sup> OHCHR, UPR of Nigeria (3rd Cycle – 31st Session): Thematic List of Recommendations, [https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session31/NG/UPR31\\_Nigeria\\_Thematic\\_list\\_of\\_Recommendations\\_E.docx](https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session31/NG/UPR31_Nigeria_Thematic_list_of_Recommendations_E.docx) (last visited June 30, 2023).
- <sup>8</sup> *Id.*
- <sup>9</sup> CONSTITUTION OF NIGERIA (1999), art. 38 § 1, [https://www.constituteproject.org/constitution/Nigeria\\_2011.pdf](https://www.constituteproject.org/constitution/Nigeria_2011.pdf).
- <sup>10</sup> *Ratification Status for Nigeria*, OHCHR, [https://tbinternet.ohchr.org/\\_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=127&Lang=EN](https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=127&Lang=EN) (last visited May 9, 2023).
- <sup>11</sup> International Covenant on Civil and Political Rights art. 18, *adopted* Dec. 16, 1966, 999 U.N.T.S. 171, <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights> [hereinafter ICCPR].
- <sup>12</sup> *Id.* art. 27.
- <sup>13</sup> Lisa Zengarini, *Over 50,000 Christians Killed in Nigeria by Islamic Extremists*, VATICAN NEWS (Apr. 17, 2023, 15:21), <https://www.vaticannews.va/en/church/news/2023-04/over-50000-christians-killed-in-nigeria-by-islamist-extremists.html>.
- <sup>14</sup> *Id.*
- <sup>15</sup> *Id.*
- <sup>16</sup> *Open Doors Releases 2023 World Watch List*, DECISION (Jan. 18, 2023), <https://decisionmagazine.com/opendoors-releases-2023-world-watch-list/>.
- <sup>17</sup> *Id.*
- <sup>18</sup> *Nigeria – Where Every 2 Hours, A Christian is Killed for Their Faith*, OPEN DOORS (Apr. 22, 2022), <https://www.opendoors.org.hk/en-US/news/latest/nigeria-every-2-hours-a-christian-is-killed-for-faith/>.
- <sup>19</sup> Ngala Killian Chimtom, *Report Claims 700 Christians Killed as ‘Farewell Gift’ to Nigeria’s Ex-President*, CRUX (June 14, 2023), <https://cruxnow.com/church-in-africa/2023/06/report-claims-700-christians-killed-as-farewell-gift-to-nigerias-ex-president>.
- <sup>20</sup> *Id.*
- <sup>21</sup> *Id.*
- <sup>22</sup> *Id.*
- <sup>23</sup> *Id.*
- <sup>24</sup> *Id.*
- <sup>25</sup> Jude Atemanke, *Missionary Priest Abducted in Nigeria’s Jos Archdiocese; Security Guard Killed*, NATIONAL CATHOLIC REGISTER (June 19, 2023), <https://www.ncregister.com/cna/missionary-priest-abducted-in-nigeria-s-jos-archdiocese-security-guard-killed>.
- <sup>26</sup> *Id.*
- <sup>27</sup> ACI Africa Staff, *Nigerian Catholic Priest Freed After Torture, Hospitalized with “Deep Wounds on His Head,”* ACIA AFRICA (June 20, 2023, 9:30 PM), <https://www.aciafrica.org/news/8519/nigerian-catholic-priest-freed-after-torture-hospitalized-with-deep-wounds-on-his-head>.
- <sup>28</sup> Magdalene Kahiu, *Nigeria’s Diocese of Kafanchan Appeals for “Intense Prayers” for Abducted Priest*, CATHOLIC NEWS AGENCY (June 13, 2023, 11:00 AM), <https://www.catholicnewsagency.com/news/254555/nigeria-s-diocese-of-kafanchan-appeals-for-intense-prayers-for-abducted-priest>.
- <sup>29</sup> Jude Atemanke, *Nigerian Catholic Priest Abducted on Corpus Christi Sunday Regains Freedom*, ACI AFRICA (June 13, 2023, 9:05 PM), <https://www.aciafrica.org/news/8474/nigerian-catholic-priest-abducted-on-corpus-christi-sunday-regains-freedom>.
- <sup>30</sup> Billy Hallowell, *PRAY: Priest Murdered by Gunmen in Nigeria, Church Expresses “Great Shock,”* FAITH WIRE (June 19, 2023), <https://www.faithwire.com/2023/06/19/pray-priest-murdered-by-gunman-in-nigeria-church-expresses-great-shock/>.
- <sup>31</sup> *Id.*
- <sup>32</sup> *Id.*

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<sup>33</sup> Steve Warren, *46 Christians Murdered: Fulani Terrorists Attack Villages in Nigeria's Benue State*, CBN (June 20, 2023), <https://www.cbn.com/news/cwn/46-christians-murdered-fulani-terrorists-attack-villages-nigerias-benue-state>.

<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

<sup>36</sup> Atemanke, *supra* note 29.

<sup>37</sup> Morning Star News, *Dozens of Christians Killed in Nigeria by Extremist Herdsmen*, CHRISTIAN POST (June 6, 2023), <https://www.christianpost.com/news/dozens-of-christians-killed-in-nigeria-by-herdsmen.html>.

<sup>38</sup> *Id.*

<sup>39</sup> *Nigeria: Armed Assailants Kill at Least 18 People in Iye, Guma LGA, May 21*, CRISIS 24 (May 22, 2023, 03:58 PM), <https://crisis24.garda.com/alerts/2023/05/nigeria-armed-assailants-kill-at-least-18-people-in-iyeguma-lga-may-21>.

<sup>40</sup> *Id.*

<sup>41</sup> *Another Priest Kidnapped in Nigeria*, HERALD MALAYSIA (May 23, 2023), <https://www.heraldmalaysia.com/news/another-priest-kidnapped-in-nigeria/71221/2>.

<sup>42</sup> Magdalene Kahiu, *Nigerian Catholic Priest Freed After Three Days in Captivity*, ACI AFRICA (June 23, 2023, 9:00 PM), <https://www.aciafrica.org/news/8325/nigerian-catholic-priest-freed-after-three-days-in-captivity>.

<sup>43</sup> *Nigeria: Latest Attacks on Christian Villages Claim 168 Lives*, RELEASE INTERNATIONAL (June 2, 2023).

<sup>44</sup> *Id.*

<sup>45</sup> *Id.*

<sup>46</sup> *Herdsmen Kill Dozens of Christians in Benue State, Nigeria*, MORNING STAR NEWS (June 5, 2023), <https://morningstarnews.org/2023/06/herdsmen-kill-dozens-of-christians-in-benue-state-nigeria/>.

<sup>47</sup> *Id.*

<sup>48</sup> Morning Star News, *Dozens of Christians Killed During Attacks in Benue State, Nigeria*, THE BAPTIST PAPER (June 6, 2023), <https://thebaptistpaper.org/dozens-of-christians-killed-during-attacks-in-benue-state-nigeria/>.

<sup>49</sup> *Id.*

<sup>50</sup> *Id.*

<sup>51</sup> Timothy Obiezu, *20 Worshipers Still Missing After Latest Church Attack in Nigeria*, VOA NEWS (May 9, 2023, 4:07 PM), <https://www.voanews.com/a/twenty-worshipers-still-missing-after-latest-church-attack-in-nigeria/7085840.html>.

<sup>52</sup> *Id.*

<sup>53</sup> *Id.*

<sup>54</sup> Morning Star News, *18 Christians Killed, Pastor, Wounded by Extremists in Nigeria*, CHRISTIAN POST (Apr. 29, 2023), <https://www.christianpost.com/news/18-christians-killed-pastor-wounded-by-extremists-in-nigeria.html>.

<sup>55</sup> *Id.*

<sup>56</sup> *Id.*

<sup>57</sup> *Id.*

<sup>58</sup> Morning Star News, *Fulani Herdsmen Kill 12 Christians in Nasarawa State, Central Nigeria*, CHRISTIAN HEADLINES (May 2, 2023), <https://www.christianheadlines.com/blog/fulani-herdsmen-kill-12-christians-in-nasarawa-state-central-nigeria.html>.

<sup>59</sup> *Id.*

<sup>60</sup> *Id.*

<sup>61</sup> Agnes Aineah, *5-Year-Old Beheaded, 33 Killed in Nigeria; Christian Foundation Calls for Action*, CATHOLIC NEWS AGENCY (Apr. 20, 2023, 14:30 PM), <https://www.catholicnewsagency.com/news/254147/5-year-old-beheaded-33-killed-in-nigeria-christian-foundation-calls-for-action>.

<sup>62</sup> *Id.*

<sup>63</sup> *Id.*

<sup>64</sup> *Id.*

<sup>65</sup> Douglass Burton, *Holy Week Attacks on Christian Communities in Nigeria Leave Nearly 100 Dead*, CATHOLIC NEWS AGENCY (Apr. 10, 2023, 13:04 PM), <https://www.catholicnewsagency.com/news/254060/holy-week-attacks-on-christian-communities-in-nigeria-leave-nearly-100-dead>.

<sup>66</sup> *Id.*

<sup>67</sup> *Id.*

<sup>68</sup> *Id.*

<sup>69</sup> Agence France-Presse in Kano, *Gunmen Kill at Least 46 People in Attack on Rural Village in Nigeria*, THE GUARDIAN (Apr. 7 2023, 13:12), <https://www.theguardian.com/world/2023/apr/07/gunmen-kill-people-attack-village-nigeria>.

<sup>70</sup> *Id.*

<sup>71</sup> *Id.*



<sup>72</sup> Leigh Pritchett, *29 Christians Slain in Attacks in Nigeria*, THE ALABAMA BAPTIST (Apr. 18, 2023), <https://thealabamabaptist.org/29-christians-slain-in-attacks-in-nigeria/>.

<sup>73</sup> *Id.*

<sup>74</sup> *Terrorists Kill 27 Christians in Kaduna State, Nigeria*, MORNING STAR NEWS (Mar. 27, 2023), <https://morningstarnews.org/2023/03/terrorists-kill-27-christians-in-kaduna-state-nigeria/>.

<sup>75</sup> *Id.*

<sup>76</sup> Pritchett, *supra* note 72.

<sup>77</sup> *Id.*

<sup>78</sup> *Id.*

<sup>79</sup> *Five Christians Killed in NE Nigeria, 12 in Middle Belt*, MORNING STAR NEWS (Jan. 24, 2023), <https://morningstarnews.org/2023/01/five-christians-killed-in-ne-nigeria-12-in-middle-belt/>.

<sup>80</sup> *Id.*

<sup>81</sup> *Id.*

<sup>82</sup> Leigh Pritchett, *Murderous Attacks against Christians Intensify in Nigeria*, ALABAMA BAPTIST (Feb. 18, 2023), <https://thealabamabaptist.org/murderous-attacks-against-christians-intensify-in-nigeria/>.

<sup>83</sup> *Id.*

<sup>84</sup> *Id.*

<sup>85</sup> *Id.*

<sup>86</sup> *Id.*

<sup>87</sup> *Id.*

<sup>88</sup> International Christian Concern, *Leah Sharibu Spends Another Birthday in Nigerian Captivity*, PERSECUTION (May 10, 2023), <https://www.persecution.org/2023/05/10/kidnapped-leah-sharibu-still-in-captivity-in-nigeria/>.

<sup>89</sup> *Id.*

<sup>90</sup> *Id.*

<sup>91</sup> *Id.*

<sup>92</sup> *Id.*

<sup>93</sup> *Id.*