



Quick Response Desk
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Re: Continued Acts of Violence Against the Pakistani Christian Minority

To:

Mr. Frank La Rue, Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression

Ms. Asma Jahangir, Special Rapporteur on freedom of religion or belief

Ms. Gay McDougall, Independent Expert on minority issues

From:

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**COMMUNICATION TO THE OFFICE OF THE HIGH COMMISSIONER FOR
HUMAN RIGHTS REGARDING RECENT ACTS OF VIOLENCE AGAINST THE
CHRISTIAN MINORITY IN PAKISTAN**

Pursuant to the Special Procedures of the Human Rights Council,¹ the European Centre for Law and Justice (ECLJ) submits this communication to Mr. Frank La Rue Lewy, Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression,² Ms. Asma Jahangir, Special Rapporteur on freedom of religion or belief,³ and Ms. Gay McDougall, Independent Expert on minority issues,⁴ to highlight a consistent pattern of gross and systematic violations of human rights and fundamental freedoms of Pakistan's Christian minority by the Pakistani authorities.

The ECLJ is an international law firm dedicated to protecting human rights and religious freedom in Europe and worldwide.⁵ Attorneys for the ECLJ have served as counsel in numerous cases before the European Court of Human Rights. Additionally, the ECLJ has special Consultative Status with the Economic and Social Council (ECOSOC) of the United Nations.

¹ G.A. Res. 60/251, ¶ 6, U.N. Doc. A/RES/60/251 (Apr. 3, 2006).

² H.R.C. Res. 7/36, U.N. Doc. A/HRC/7/36 (Mar. 28, 2008) (extending the mandate for three years).

³ H.R.C. Res. 6/37, U.N. Doc. A/HRC/6/37 (Dec. 14, 2007) (extending the mandate for three years).

⁴ H.R.C. Res. 7/6, U.N. Doc. A/HRC/7/6 (Mar. 27, 2008) (extending the mandate for three years).

⁵ The American Center for Law and Justice (ACLJ), with whom the ECLJ is affiliated, also shares the views expressed in this communication.

I. KORIAN AND CHRISTIAN TOWN, GOJRA ATTACKS: **JULY 30 & AUGUST 1, 2009⁶**

A rumor of desecration of the Qur'an prompted a string of events in Pakistan at the end of July, culminating in an attack by a mob of thousands of religiously-motivated Muslims who set ablaze more than 50 homes and a church in Christian Town, Gojra on August 1, 2009. The attack left at least seven Pakistani Christians dead after being burned alive. The murderous attack came in the midst of a pre-arranged protest by thousands of Muslim extremists who shot at the police, inciting the police to use teargas and gunfire. Only two days earlier, on July 30, the very same rumor prompted an arson assault by a group of 500 Islamic extremists on the village of Korian, seven miles from Christian Town.

A. FACTS

July 30

On July 30, 2009, more than 500 extremist Muslims attacked and burned down over 45 Christian houses and desecrated 2 churches in the Korian village in Pakistan. The incident was triggered by an announcement in the local mosque that Christians desecrated a copy of the Qur'an during a wedding ceremony on July 25. One day before the incident, a Muslim family went to the bride's house and accused the family of desecrating the Qur'an. The Christians denied the false allegation, but the Muslim family began beating them.

The local mullah then gave the Christian "infidels" a choice: leave the village or die. "Let's teach the infidels an exemplary lesson," the mullah announced from his mosque. Hundreds of Muslims answered the call. They attacked Christian houses, first looting all valuables, then setting the houses on fire. The Christians fled, leaving everything behind.

Only one elderly couple remained: Sharif Masih (80) who was paralyzed and his wife, Hanifa Bibi (73), who begged the mob to spare their lives. However, Masih died from shock three days later. Firefighters could not reach the scene because the assailants blocked the highway.

August 1

The Muslims did not stop with the first attack in Korian. On August 1, they organized a demonstration to protest the alleged desecration of the Qur'an. The angry mob demanded the arrest of the people allegedly responsible for desecrating the Qur'an in the Korian village. The angry protesters also blocked railway lines, stranding trains. The police fired tear gas to disperse the mob. The mob ran toward the Christian Town, Gojra, in the Toba Tek Singh district. There, the Muslims looted more than 100 houses and set fire to at least 40 more. At least seven charred bodies of men, women, and children were found in the rubble.

The assailants included members of the banned sectarian group Sipah-e-Sahaba⁷ and were fully equipped with automatic weapons. This was later noted by the Federal Minister of

⁶ The ACLJ collaborates with Community Development Initiative (CDI) of Pakistan. CDI dispatched a fact finding team immediately upon receiving news of the attacks described in the following section. All of the data referred to in the facts section is the result of firsthand knowledge gleaned from investigation by CDI. See Letter from Asif Aqeel, Executive Director, CDI, to ACLJ (Aug. 14, 2009) (attached; on file with ACLJ) [hereinafter Gojra Field Report].

Minorities Affairs, Shahbaz Bhatti, and the Human Rights Commission of Pakistan (“HRCP”).⁸ The perpetrators looted houses and then set fire to more, burning down homes with women, children, and men inside. Pakistani television channels broadcast the horrific scene, revealing the charred bodies as they were recovered from the rubble.

B. COMMUNICATION WITH PAKISTANI AUTHORITIES

1. *Failure of Pakistani Authorities to Intercede or Prosecute*

Attempts were made to contact the fire department in the midst of the attacks. Eventually, the firefighters’ office explained that all firefighters were busy extinguishing a fire at a gas station. The firefighters and rescue teams only arrived at the scene of the attack after the mob had fled the scene. The police remained nothing more than silent spectators, eventually leaving the scene as well. The mob had free reign to attack, which they did for several hours.

President Asif Ali Zardari’s office was notified of this second major attack in two days, but the only response, according to NGOs, was that the President had taken “strict notice” of the incident and had asked the provincial government to inquire into the matter.⁹

The District Police Officer (DPO) was contacted for help; the DPO falsely claimed that no church or Christian colony fell within the protestors’ route, and later said that a mob of several thousand men was too big for the police to control.¹⁰ The Minister of the Interior received a request that either paramilitary troopers be deployed or a curfew be imposed to deal with the situation. But no help was sent.

Upon learning of the failure of the authorities to pursue prosecution of the hundreds involved in the event, local Christians and NGOs instituted a protest by refusing to bury the victims who died in the attack until the police filed a First Information Report (FIR) against the mobsters and the negligent police officials. Only then did the police register the FIR, but against only 20 named individuals—800 in the report remain unidentified.

⁷ Sipah-e-Sahaba is a terrorist organization. Its aim is to “transform Pakistan by violent means into a Sunni state under the total control of [Shari’ah] law. Another objective is to have all Shia declared Kafirs [infidels] and to participate in the destruction of [Judaism], Christianity and Hinduism.” U.K. Home Office, Office of Security and Counter Terrorism, Proscribed Terrorist Groups, <http://security.homeoffice.gov.uk/legislation/current-legislation/terrorism-act-2000/proscribed-groups> (last visited Aug. 20, 2009).

⁸ See *Gojra Attacks Were Pre-planned: HRCP*, DAILY TIMES, Aug. 5, 2009, available at http://www.dailytimes.com.pk/default.asp?page=2009\08\05\story_5-8-2009_pg1_1 [hereinafter *Gojra Attacks Were Pre-planned: HRCP*].

⁹ Gojra Field Report, *supra* note 6.

¹⁰ *Id.*

2. *Actions taken by the Authorities*

The most telling action taken by the authorities involves the very incident that sparked this violent attack. Provincial Law Minister, Rana Sanaullah, Federal Minister of Minorities Affairs, Shahbaz Bhatti, and a local police chief, Ahmed Javaid, announced that the investigation into the allegation of desecration of the Qur'an revealed that *no such desecration occurred*.¹¹

The President, the Prime Minister, the Interior Minister, and the Chief Minister of the Punjab have “taken notice of the incident.” They asked the local authorities to submit reports of the incident. The Chief Justice of the Lahore High Court took a *suo moto* notice. The President also ordered that rangers be deployed, but only after the incident had already occurred. The President has promised monetary compensation for the murdered Christians and for the homes that were burned. The President has also ordered a judicial inquiry into the matter. However, “it will be most unusual if the inquiry leads anywhere.”¹² Similar actions in the past have not resulted in justice.¹³ In general, no one is ever prosecuted.¹⁴ The result is usually a “compromise” or “reconciliation.”

II. KASUR: **June 30, 2009**¹⁵

A. FACTS

One month prior to the incident in Gojra, a nearly identical attack occurred in another small Christian village in Kasur. An alleged “blasphemy against Islam” sparked an attack by hundreds of Muslims, resulting in destruction, injury, and the looting of an entire Christian village. In spirit, this attack is indistinguishable from the July 30/August 1 incident. All of these attacks stem from one source: religiously-inspired hatred of Christians.

On June 30, 2009, more than 500 Muslims attacked about 135 Christian families in a small village in Kasur, Pakistan. The mob beat Christian women and children as most of the men were working in the fields. They also damaged personal property and stole valuables belonging to Christians. The attack was initiated when a Muslim, Muhammad Hussain, beat a Christian field worker, Sardar Masih (37), on June 29, in Bahmaniwala, a village in Kasur. Masih asked Hussain to move his motorbike from the middle of the road to allow Masih to pass through on his tractor. Hussain asked how a “*churha*” (sweeper/janitor—a derogatory term particularly used for Punjabi Christians belonging to low castes) could tell him what to do. Hussain then beat Masih. Family members rushed to the scene, where a crowd had

¹¹ Gojra Field Report, *supra* note 6; Arif Ghias, *Gojra Christians and Protest After DCO, DOP Booked*, THE NEWS, Aug. 3, 2009, available at http://www.thenews.com.pk/top_story_detail.asp?Id=23637; *Pakistan: Christians Strive for Justice Following Onslaught*, COMPASS DIRECT NEWS, Aug. 5, 2009, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=6053&backpage=&critere=&countryname=&rowcur=>; Aleem Maqbool, *Sectarian Violence Hits Pakistani Town*, BBC NEWS, Aug. 12, 2009, http://news.bbc.co.uk/2/hi/south_asia/8196013.stm.

¹² Mahir Ali, *Hate Crimes in Pakistan Continue with Little Governmental Response*, FORBES, Aug. 5, 2009, available at <http://www.forbes.com/2009/08/05/christian-pakistan-murders-opinions-contributors-mahir-ali.html>.

¹³ See, e.g., *infra* Section II.B.2.

¹⁴ See, e.g., *infra* Section II.B; see also Appendix ¶ 16.

¹⁵ Letter from Asif Aqeel, Executive Director, CDI, to ACLJ (Jul. 15, 2009) (attached; on file with ACLJ [hereinafter Kasur Field Report]).

already gathered. After a brief exchange of words, the Masih family returned to their home. Later, Hussain—along with 15 to 20 men—attacked their house. Armed with hatchets, the assailants attacked the Masihis, severely injuring the family. The attackers eventually fled the scene.

A village official warned the Masihis not to report the incident to police, and instead gave the assailants the opportunity to report it and register a case alleging that the Masih family beat them for wrongly parking the motorbike. When the Christians went to the police, they were ignored and informed that the other party had already registered a FIR. The injured Christians went to the Kasur Civil Hospital and were forced to sit outside the hospital without treatment for the entire night—even though the Muslim family had already been treated.

While the Masihis were at the hospital, hundreds of Muslim villagers accused Christians in Kasur of blaspheming Islam. After a call from a local mosque, a violent Muslim mob ravaged the village and the houses, setting fires, destroying property, stealing family savings and valuables, and beating Christian women. Hundreds of families were without electricity, food, and clothing. The assailants have not been arrested. Authorities have been successful in pressuring the Christians to “reconcile” and not press any legal charges.

B. COMMUNICATION WITH PAKISTANI AUTHORITIES

1. *Failure of Pakistani Authorities to Intercede or Prosecute the Perpetrators*

The DPO, Muhammad Shahzad Sultan, who is in charge of the police in the Kasur district, told the fact-finding team that he had taken all measures toward reconciliation. He said the FIR of the incident had *not* been registered because Muslims were demanding a blasphemy case be filed against the Christians. He said that several government officials had visited the area and suggested that this matter be taken care of quickly and quietly, since exacerbating the situation would only jeopardize Christians—there are only 137 Christian families in the area while more than a million Muslims reside in Kasur. He said that if it became public that the police had not registered the blasphemy case against the Christians, then controlling the Muslims would be impossible. The DPO said that the best option was reconciliation between the Muslim and Christian communities.

2. *Actions Taken by the Authorities*

The Lahore High Court took a *suo moto* notice of the incident. The DPO informed the Court that the Federal and Provincial governments have provided monetary compensation to the Christians.¹⁶ He further informed the Court that Provincial and Federal governments have formed a committee “to avoid any further incident,” and the local police were given one month so that the matter may be “patched up amicably.”¹⁷ The court then disposed of the action, noting that the case called for no further action.¹⁸ The assailants have not been prosecuted and are still at large following the state-sponsored reconciliation.

¹⁶ State v. D.P.O. Kasur [Lahore High Court], No. 14231 (2009) (Pak.).

¹⁷ *Id.*

¹⁸ *Id.*

III. NUMEROUS ACTS OF COMMUNAL VIOLENCE BY MUSLIM EXTREMISTS AGAINST THE CHRISTIAN MINORITY

Unfortunately, these are not isolated incidents as Pakistani authorities suggest.¹⁹ Numerous attacks on places of worship, extrajudicial killings, rioting, and vandalism against minorities after the U.S.-led wars in Afghanistan and Iraq show that the Pakistani government is fully aware of the violent inclinations of some members of its society but has not taken any measures to protect its minority citizens from such acts.

During the last decade, over 60 Christians have been killed in at least 27 separate incidents of Muslim on Christian violence and over 180 have been injured, some severely.²⁰ Victims have suffered from shootings at churches and schools, bombings of churches, hospitals and schools, the destruction of their homes, and beatings of victims in their homes and churches with axes, hatchets, sticks, bricks, rocks, and any other items rioters get their hands on. The Christian population has been devastated financially as the mobs loot and ransack their homes and churches, stealing all their valuables and destroying their homes and means of livelihood. For an already poverty-stricken segment of society, these atrocities have left most Christians in desperation. The Pakistani government says that it is taking action against these atrocities that continue to plague the Christians of Pakistan; however, cases summarized in the Appendix show that little has actually been done to curb the violence, and the administration has yet to take any measurable steps for peace. A Pakistani newspaper the Daily Times reported that local administrative authorities failed to respond quickly to the August 1 incident to “prevent the initial signs of instigation from turning into a riot, and then leading to the tragedy of deaths of innocent people.”²¹

IV. KILLINGS IN OTHER BLASPHEMY CASES

Apart from the acts of group violence, at least 25 people have been murdered after individual cases of false blasphemy allegations.²² According to the National Commission for Justice and Peace, “833 persons have been charged in 375 cases under blasphemy laws from 1986 to 2006.”²³ This practice has continued even after the government changed from military rule to a democratically elected government. In 2008 alone, “authorities arrested at least 25 Ahmadis, 11 Christians, and 17 Muslims on blasphemy charges.”²⁴

¹⁹ Maqbool, *supra* note 11.

²⁰ See Appendix for summaries of cases.

²¹ Syed Mohammad Ali, *Development: Repeal Discriminatory Legislation!*, DAILY TIMES, Aug. 11, 2009, available at http://www.dailytimes.com.pk/default.asp?page=2009%5C08%5C11%5Cstory_11-8-2009_pg3_5.

²² Benedict Rogers, *Unholy Laws*, GUARDIAN.CO.UK, May 6, 2008, <http://www.guardian.co.uk/commentisfree/2008/may/06/unholylaws>; see also CTR. FOR LEGAL AID & ASSISTANCE SETTLEMENT (CLAAS), ENDING THE ABUSE OF THE BLASPHEMY LAW 2 (2008) [hereinafter CLAAS, ABUSE OF BLASPHEMY LAW], available at <http://www.claas.org.uk/files/CLAAS%20Blasphemy%20Bro%20080507.pdf>.

²³ NAT'L COMM'N FOR JUSTICE & PEACE, HUMAN RIGHTS MONITOR 2007: A REPORT ON RELIGIOUS MINORITIES IN PAKISTAN (2007), http://www.geocities.com/ncjp_pak/ch6pg60-62.htm.

²⁴ U.S. DEP'T OF STATE: BUREAU OF DEMOCRACY, HUMAN RIGHTS & LABOR, INTERNATIONAL RELIGIOUS FREEDOM REPORT 2008: PAKISTAN, available at <http://www.state.gov/g/drl/rls/irf/2008/108505.htm>. [hereinafter INTERNATIONAL RELIGIOUS FREEDOM REPORT 2008].

V. VIOLATION OF INTERNATIONAL HUMAN RIGHTS STANDARDS

A. PAKISTAN'S OBLIGATIONS AS A U.N. MEMBER STATE

Pakistan became a member of the United Nations on September 30, 1947.²⁵ Pakistan is therefore required to respect and adhere to the rule of law.²⁶ As a Member State, Pakistan must accept the obligations contained in the Charter of the United Nations (U.N. Charter) and be willing and able to carry out those obligations.²⁷ According to Article 1 of the Charter, one of the purposes of the existence of the United Nations is “[t]o achieve international co-operation in solving international problems of an economic, social, cultural, or humanitarian character, and in promoting and encouraging respect for human rights and for fundamental freedoms for all without distinction as to race, sex, language, or religion.”²⁸ Another purpose of the U.N. is to create stability through the promotion of “universal respect for, and observance of, human rights and fundamental freedoms for all without distinction as to race, sex, language, or religion.”²⁹

After the brutal Hindu-Muslim divide that culminated in the bloody riots of 1947—and Pakistan’s independence—the country’s own founding documents reflected the significant need to promote tolerance for religious minorities.³⁰ The 1956 Constitution codified the right to profess, practice, and propagate one’s religion; to attend school freely without religious instruction; to enjoy places of public entertainment without religious discrimination; to qualify for appointment in the service of Pakistan without religious discrimination; and to preserve and promote language, script, or culture without religious discrimination.³¹ Moreover, the amended Constitution of Pakistan (the version that has remained unchanged since 1973) has in no way abrogated those rights. Article 19 gives “[e]very citizen . . . the right to freedom of speech and expression.”³² Article 20 guarantees “every citizen . . . the right to profess, practice and propagate his religion.”³³ More importantly, article 25 entitles “[a]ll citizens . . . to equal protection of law.”³⁴ However, as the reports in this petition and Appendix demonstrate, in practice, members of minority religions such as Christianity do not benefit from the same protections as do the Muslims of Pakistan.

Moreover, since February 1997, after the attack on a Christian village, Shantinagar,³⁵ the government of Pakistan has clearly given ground to Muslim extremists who promote the rule of Shari’ah law over the rule of law espoused by member states of the U.N. and Pakistan’s own Constitution. Instead of providing protection for members of minority

²⁵ Press Release, Economic and Social Commission for Asia and the Pacific (ESCAP), United Nations Member States, U.N. Doc. L/37/06 (Jul. 3, 2006).

²⁶ United Nations, United Nations and the Rule of Law, <http://www.un.org/en/ruleoflaw/index.shtml> (last visited Aug. 6, 2009).

²⁷ U.N. Charter art. 4.

²⁸ *Id.* art. 1, para. 3.

²⁹ *Id.* art. 55(c).

³⁰ See Library of Congress, A Country Study: Pakistan, <http://lcweb2.loc.gov/frd/cs/pktoc.html> (last visited Aug. 7, 2009) (click on “Toward Partition” and “Constitutional Beginnings”).

³¹ PAK. CONST. arts. 13, 14, 17–19 (1956). These provisions clearly have their roots in the U.N. Charter.

³² PAK. CONST. art. 19 (1973), available at <http://www.pakistani.org/pakistan/constitution/part2.ch1.html>.

³³ PAK. CONST. art. 20.

³⁴ PAK. CONST. art. 25.

³⁵ See Appendix ¶ 28.

religions, there has been inaction on the part of police officials and reluctance on the part of government agencies to even file a complaint in the face of such violence.³⁶

According to the United States Commission on International Religious Freedom, after a year of unchecked growth of religiously-motivated Muslim extremist groups, “with Pakistani authorities ceding effective control to armed insurgents espousing a radical Islamist ideology,” the lack of government response is, in some cases, “outright complicit.”³⁷ This trend of governmental failure to protect its minority citizens and the further failure to prosecute those who commit religiously-motivated hate crimes violates the U.N. Charter, provisions of international treaties, including two which Pakistan has ratified, peremptory norms, and, through reciprocity, principles of religious freedom espoused by Pakistan’s own government.

B. PAKISTAN’S OBLIGATIONS UNDER THE PRINCIPAL U.N. HUMAN RIGHTS TREATIES

1. *Pakistan Has Violated the ICERD Through the Incitement of Religious Hatred, the Refusal to Provide Security and Protection Against Violence, and the Denial of Equal Treatment Under the Law*

Pakistan ratified the International Convention on the Elimination of all Forms of Racial Discrimination (ICERD) in September of 1966.³⁸ According to Pakistan’s own draft resolution before the United Nations General Assembly,³⁹ the ICERD is equally applicable to religious discrimination:

[Pakistan] *Reaffirms* that general comment No. 15 of the Committee on the Elimination of Racial Discrimination, in which the Committee stipulated that the prohibition of the dissemination of all ideas based upon racial superiority or hatred is compatible with freedom of opinion and expression, *is equally applicable to the question of incitement to religious hatred . . .*⁴⁰

Therefore, Pakistan, being legally bound by the provisions of the ICERD, has agreed that all signatories to the ICERD are subject to its authority with regard to discrimination that incites “religious hatred.”⁴¹

In its concluding observations, the Committee on the Elimination of Racial Discrimination (CERD) expressed its concern about blasphemy laws and violations of the

³⁶ See *infra* Section II.B.1; see also Appendix ¶¶ 5, 7, 9, 15, 18.

³⁷ U.S. COMM’N ON INT’L RELIGIOUS FREEDOM, ANNUAL REPORT 65 (2009), available at <http://www.uscirf.gov/images/AR2009/final%20ar2009%20with%20cover.pdf>.

³⁸ Status by Country, <http://www.unhchr.ch/TBS/doc.nsf/newhvstatusbycountry?OpenView&Start=131&Count=15&Expand=131> (last visited Aug. 7, 2009) [hereinafter Status by Country].

³⁹ H.R.C. Draft Res., U.N. Doc. A/HRC/10/L.2/Rev.1 (Mar. 26, 2009) [hereinafter Combating Defamation of Religions]. Pakistan submitted the resolution on behalf of the Organization of the Islamic Conference (OIC). Since Pakistan is a member of the OIC and has endorsed the resolution, it is fair to treat the resolution as Pakistan’s resolution.

⁴⁰ *Id.* ¶ 11

⁴¹ See *id.*

right to freedom of religion.⁴² The CERD observed that parties to the ICERD must guarantee their citizens “their right to freedom of thought, conscience and religion, without any discrimination based on race, colour, descent or national or ethnic origin.”⁴³ The blasphemy laws in Pakistan, however, have led only to mob rule and religiously-motivated Muslim attacks against Christians.⁴⁴

In addition, the ICERD guarantees “equality before the law”;⁴⁵ the “right to equal treatment before the tribunals and all other organs administering justice”;⁴⁶ and the “right to security of person and protection by the State against violence or bodily harm, whether inflicted by government officials or by any individual group or institution”⁴⁷—all without regard to race, colour, or national or ethnic origin.⁴⁸ However, Pakistani officials did not offer protection against violence or bodily harm when, after a decade of violence against Christians and mere days after the incidents of June and July, Muslim protestors yet again rioted and attacked the Christian Town in Gojra on August 1. On August 4, yet another unfounded allegation of blasphemy led to an attack in which a factory owner and two others were killed when workers attacked them for allegedly desecrating the Qur’an.⁴⁹ One day after that incident, a mob attacked a sixty-year-old woman in her home in Lahore’s Sanghar district.⁵⁰ Instead of punishing the Muslim extremists for attempting to enforce mob rule, the authorities are detaining the woman pending an investigation into the charges of blasphemy. Such behavior hardly constitutes equal treatment before an “organ administering justice.”

2. *Pakistan Is Bound by the ICCPR and CAT Through Peremptory Norms, and Reciprocity*

Pakistan has not ratified the International Covenant on Civil and Political Rights (ICCPR)⁵¹ or the Convention Against Torture (CAT),⁵² but it is a signatory to both treaties.⁵³ Although its status as a signatory does not bind Pakistan to the provisions of these treaties, Pakistan cannot take actions contrary to the object and purpose of these treaties.⁵⁴ Pakistan’s blasphemy laws, lack of protection of minorities, and failure to prosecute acts of violence against minorities are clearly contrary to the object and purpose of the ICCPR and the CAT.

⁴² Comm. on the Elimination of Racial Discrimination, International Convention on the Elimination of All Forms of Racial Discrimination, *Concluding Observations of the Committee on the Elimination of Racial Discrimination*, ¶ 19, U.N. Doc. CERD/C/PAK/CO/20 (Feb. 16–Mar. 6, 2009) [hereinafter CERD Concluding Observations]; see also International Covenant on the Elimination of Racial Discrimination art. 5(d)(vii), G.A. Res. 2106 (XX), Annex, U.N. GAOR, 20th Sess., Supp. No. 14, U.N. Doc. A/6014, 660 U.N.T.S. 195 (Dec. 21, 1965) [hereinafter ICERD].

⁴³ ICERD, *supra* note 42.

⁴⁴ See *supra* Sections I, II; see also Appendix (most attacks were followed by a blasphemy allegation).

⁴⁵ ICERD, *supra* note 42, art. 5.

⁴⁶ *Id.* art. 5(a).

⁴⁷ *Id.* art. 5(b).

⁴⁸ *Id.* art. 5.

⁴⁹ See Appendix ¶ 2.

⁵⁰ See Appendix ¶ 1.

⁵¹ International Covenant on Civil and Political Rights, Dec. 19, 1966, 999 U.N.T.S. 171 [hereinafter ICCPR].

⁵² Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Dec. 10, 1984, G.A. Res. 39/46, U.N. GAOR, 39th Sess., Supp. No. 51, U.N. Doc. A/39/51 [hereinafter CAT].

⁵³ Status by Country, *supra* note 38.

⁵⁴ Vienna Convention on the Law of Treaties, art. 18, 1155 U.N.T.S. 331, May 23, 1969. (A State must “refrain from acts which would defeat the object and purpose of a treaty when . . . it has signed the treaty or has exchanged instruments constituting the treaty subject to ratification, acceptance or approval, until it shall have made its intention clear not to become a party to the treaty . . .”).

a. *ICCPR and CAT Provisions as Peremptory Norms*

A State's obligation to protect basic rights of the human person is an obligation of the State toward the international community as a whole.⁵⁵ Therefore, respect for human rights is an obligation *erga omnes*, binding on all nations, regardless of whether a State is party to international human rights treaties.⁵⁶ The right to freedom of religion and prohibition of discrimination on the basis of religion are non-derogable core rights under international law.⁵⁷ Therefore, Pakistan's signature to, but non-ratification of, the ICCPR does not release the country from its obligation to provide religious freedom without any discrimination.

Pakistan's own jurists have contributed to the *opinio juris* that regards the ICCPR as a peremptory norm. At the Bangalore Colloquium in 1988, then-Chief Justice of Pakistan Muhammad Haleem stated the following:

All rules of general international law created for humanitarian purposes constitute *jus cogens* [A] matter is essentially within the domestic jurisdiction of the state only if it is not regulated by international law The international human rights norms are in fact part of the constitutional expression of the liberties guaranteed at the national level.⁵⁸

Thus, even though Pakistan has not ratified the ICCPR, Pakistan's own jurists affirm the peremptory nature of international human rights law by noting that such law should regulate certain matters arising under common law Pakistani jurisdiction.

Article 7 of the ICCPR guarantees the right not to be "subjected to torture or cruel, inhuman or degrading treatment or punishment."⁵⁹ Article 14 provides all criminal or civil defendants the right to "fair and public hearing by a competent, independent and impartial tribunal *established by law*."⁶⁰ Nowhere in the ICCPR or in any other international law (or Pakistani law for that matter) are private citizens provided with a right to punish criminal defendants. Defiling a copy of the Qur'an is a punishable offense under the Pakistani penal code.⁶¹ This law violates international human rights standards agreed to by Pakistan.⁶² Even if such a draconian law must exist, the alleged violators should, at a minimum, be tried in the

⁵⁵ Peter G. Danchin, *U.S. Unilateralism and the International Protection of Religious Freedom: The Multilateral Alternative*, 41 COLUM. J. TRANSNAT'L L. 33, 76 (2002) (quoting Barcelona Traction, Light and Power Co. (Belg. v. Spain), 1970 I.C.J. 4, 32 (Feb. 5)).

⁵⁶ See *id.* (citing International Law Institute, *The Protection of Human Rights and the Principles of Non-Intervention in Internal Affairs of States*, 63 Institut de Droit International Annuaire [Institute of International Law Directory] 338 (1989)).

⁵⁷ The Siracusa Principles on the Limitation and Derogation Provisions in the International Covenant on Civil and Political Rights, U.N. Doc. E/CN.4/1985/4, Annex (1985); see also Human Rights Committee, *General Comment 22* ¶ 1, U.N. Doc. CCPR/C/21/Rev. 1/Add. 4 (1993).

⁵⁸ Amjad Mahmood Khan, *Persecution of the Ahmadiyya Community in Pakistan: An Analysis Under International Law and International Relations*, 16 HARV. HUM. RTS. J. 217, 232–33 (2003) (quoting Muhammad Haleem, Domestic Application of Human Rights Norms, in IV DEVELOPING HUMAN RIGHTS JURISPRUDENCE: A FOURTH JUDICIAL COLLOQUIUM ON THE DOMESTIC APPLICATION OF HUMAN RIGHTS NORMS 101 (Judicial Colloquium in Abuja, 1991)).

⁵⁹ ICCPR, *supra* note 51, art. 7.

⁶⁰ *Id.* art. 14(1) (emphasis added).

⁶¹ Penal Code, § 295-B (1982) (Pak.) ("Defiling, etc., of Holy Qur'an: Whoever wilfully defiles, damages or desecrates a copy of the Holy Qur'an or of an extract therefrom or uses it in any derogatory manner or for any unlawful purpose shall be punishable with imprisonment for life.").

⁶² See CERD Concluding Observations, *supra* note 42.

courts of law, not at the hands of extremist citizens who attack innocent fellow citizens, burn their properties, or kill them in the name of Islam.

The sheer number of violent attacks on the Christian minority is evidence that Pakistani authorities are on notice of such attacks, but they have not prevented such attacks or prosecuted the attackers in the past.⁶³ In fact, according to the HRCP, police were informed of the announcements from mosques urging violence against Christians but did nothing, even though police officials confirmed that they had indeed heard about the announcements on August 1.⁶⁴ In addition, a police contingent present in Gojra did nothing to stop the mob as it approached the Christian village. Therefore, Pakistan has violated international as well as its domestic law,⁶⁵ both of which provide for the freedom of religion.

b. *State Acquiescence in Acts of Violence—A Violation of CAT*

Pakistan is also a signatory to CAT. The prohibition of torture is an absolute and non-derogable peremptory *jus cogens* norm under customary international law.⁶⁶

[T]he term ‘torture’ means any act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person for . . . an act he or a third person has committed or is suspected of having committed . . . or for any reason based on discrimination of any kind, when such pain or suffering is inflicted by or at the instigation of or with the consent or *acquiescence* of a public official or other person acting in an official capacity.⁶⁷

Mob attacks on minorities, burning them to death, and severely injuring an alleged blasphemer would clearly fall under this definition. The Special Rapporteur on torture and other cruel, inhuman, or degrading treatment or punishment has noted that the prohibition against torture is not restricted to the actions of public officials, such as law enforcement agents.⁶⁸ The Committee Against Torture, in its general comment 2, has made it clear that the state action requirement is satisfied when the states “know or have reasonable grounds to believe that acts of torture or ill-treatment are being committed by non-State officials or *private actors*”⁶⁹ States have to “exercise due diligence to prevent, investigate, prosecute and punish such non-State officials or private actors”⁷⁰ The lack of such due diligence is considered acquiescence in such impermissible acts.⁷¹

Cases summarized in the Appendix and the media reports show that the Pakistani government is well aware of these acts of torture but has not taken any diligent measures to

⁶³ See generally Appendix.

⁶⁴ *Gojra Attacks Were Pre-planned: HRCP*, *supra* note 8.

⁶⁵ PAK. CONST. arts. 20, 22, 26, 27, 28 (1973), *available at* <http://www.pakistani.org/pakistan/constitution/part2.ch1.html>.

⁶⁶ Committee Against Torture, Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, *General Comment No. 2*, ¶ 1, U.N. Doc. CAT/C/GC/2 (2008) [hereinafter CAT Gen. Comment 2].

⁶⁷ CAT, *supra* note 52, art. 1 (emphasis added).

⁶⁸ Special Rapporteur on Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment, *Interim Report on Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment*, ¶ 51, *delivered to the General Assembly*, U.N. Doc. A/63/175 (July 28, 2008).

⁶⁹ CAT Gen. Comment 2, *supra* note 66 (emphasis added).

⁷⁰ *Id.*

⁷¹ *Id.*

remedy violence against minorities. Human rights organizations informed government officials about the exasperating situation in Gojra. They asked the Ministry of Interior to deploy police officers and paramilitary troopers. However, help was sent only after the mob violence had ended. During a protest against blasphemy laws, the police arrested about 480 Christian protesters in 1998 and kept them in six different police stations.⁷² This shows that Pakistani authorities, with their heavy police and armed forces, are capable of controlling protests. However, Pakistani police did nothing to stop violent Muslims in Gojra. This inaction by the Pakistani authorities can be clearly seen in almost every previous attack on minorities. After the attack in Gojra on August 1, the district police chief said that a mob of several thousand men was too big for the police to control. The disinterest of Pakistani authorities in stopping violent mobsters shows their acquiescence in mob violence when Pakistani Muslims attack minorities. Such acquiescence constitutes state action as described by CAT.⁷³ Further, the monetary compensation promises by the authorities after such attacks are hardly an act of justice.

c. *Pakistan's Resolution Explicitly Endorses the UDHR and the ICCPR, and Pakistan Must be Held Accountable for Violations of the Same Through Reciprocity*

Similarly, Pakistan has officially proclaimed the universality of the religious freedom provisions of the ICCPR and the Universal Declaration of Human Rights (UDHR)⁷⁴ in its draft resolution on Combating Defamation of Religions.⁷⁵ The first line of the resolution “reaffirms the pledge made by all States under the [U.N. Charter] to promote and encourage universal respect for and observance of human rights and fundamental freedoms for all, without distinction as to race, sex, language, or religion.”⁷⁶ This statement echoes nearly word for word Article 2 of the UDHR.⁷⁷ The resolution emphasizes the importance of Article 10 of the UDHR and Articles 19 and 20 of the ICCPR, which state that “everyone has the right to hold opinions without interference and the right to freedom of expression . . . [which] may . . . be subject to limitations only as provided for by law and are necessary for respect of the rights or reputations of others, protection of national security or of public order, public health or morals and general welfare.”⁷⁸ The existence of blasphemy laws—a blatant restriction on freedom of expression—violates this principle, proclaimed to be an international human rights standard by Pakistan itself.

The right to manifest one's religion and the right to freedom of expression and opinion is subject to limitations that are necessary to protect “national security,” “public safety, order, health, or morals or the fundamental rights and freedoms of others.”⁷⁹ Violent attacks against the Christian minority in Pakistan are always triggered by false allegations of

⁷² Asawal Sardar, *Lahore Riots*, COMPASS DIRECT NEWS in 1998 REPORTS FROM PAKISTAN (Int'l Assoc. for Religious Freedom, ed. 1998), available at <http://www.geocities.com/~iarf/pakreport.html#riotsin> (reporting about protests by Christians against blasphemy laws after Bishop John Joseph committed suicide when Ayub Masih, who was accused of blasphemy, was sentenced to death).

⁷³ See *supra* notes 69–71 and accompanying text.

⁷⁴ Universal Declaration of Human Rights, G.A. Res. 217A, U.N. GAOR, 3d Sess., 1st. plen. mtg., U.N. Doc A/810 (Dec. 12, 1948) [hereinafter UDHR].

⁷⁵ Combating Defamation of Religions, *supra* note 39.

⁷⁶ *Id.*

⁷⁷ UDHR, *supra* note 74, art. 2.

⁷⁸ Combating Defamation of Religions, *supra* note 39; see also ICCPR, *supra* note 51, art. 19.

⁷⁹ ICCPR, *supra* note 51, arts. 18–19.

blasphemy.⁸⁰ Instead of limiting a freedom to protect public safety and order, the blasphemy laws in Pakistan have in fact consistently created violent incidents of public *disorder*, thus creating a situation directly contrary to the purpose of the limitation the laws propose to uphold.

Because Pakistan has explicitly proclaimed the terms of the UDHR and the ICCPR in its resolution to the U.N., it should, by reciprocity, abide by those terms with respect to its own religious minorities and be required to afford the Christians of Pakistan the same rights it expects the international community to give to Muslims.

3. *Violation of Declaration on the Elimination of All Forms of Intolerance and Discrimination Based on Religion or Belief*

The Declaration on the Elimination of All Forms of Intolerance and Discrimination Based on Religion or Belief (“Declaration”) further reinforces the preexisting international standards of human rights and religious freedom that are found in the U.N. Charter, the UDHR, and the ICCPR.⁸¹ The Declaration requires Member States to “adopt all necessary measures for the speedy elimination of [religious] intolerance in all its forms and manifestations”⁸² Instead of taking measures in accordance with the Declaration, Pakistan created an atmosphere of intolerance through its religious laws. The blasphemy laws thus violate Article 4(2) which requires all Member States to “make all efforts to enact or rescind legislation where necessary to prohibit” discrimination or intolerance based on religion.⁸³ Article 2(2) of the Declaration separates religious intolerance from religious discrimination “so that religious minorities gain virtually exhaustive protection from systemic cruelty from members of another religion” or even from a State.⁸⁴ These violations demonstrate that Pakistan has not lived up to the standards that it is required to uphold as a U.N. Member State.

4. *Pakistani Textbooks Violate Article 13 of the International Covenant on Economic, Social, and Cultural Rights*

Pakistan is in violation of its obligations under the International Covenant on Economic, Social and Cultural Rights (ICESCR) Article 13, which requires States to ensure that education “enable all persons to participate effectively in a free society, promote understanding, tolerance and friendship among all nations and all racial, ethnic or religious groups, and further the activities of the United Nations for the maintenance of peace.”⁸⁵ Instead of promoting tolerance, Pakistani curricula engender intense ethnic, religious, national, and gender prejudice and incite individuals to militancy.⁸⁶

⁸⁰ For specific examples, *see, e.g.*, Appendix ¶¶ 1–2, 6, 8, 10, 16–17, 26.

⁸¹ Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief, G.A. Res. 55, U.N. Doc. A/RES/36/55 (Nov. 25, 1981).

⁸² *Id.*

⁸³ *Id.*

⁸⁴ Khan, *supra* note 58, at 234 (discussing “emerging customary international human rights law concerning religious freedom.”).

⁸⁵ International Covenant on Economic, Social and Cultural Rights art. 13(1), Dec. 16, 1966, 993 U.N.T.S. 3.

⁸⁶ *See generally* THE SUSTAINABLE DEVELOPMENT POLICY INSTITUTE, THE SUBTLE SUBVERSION: THE STATE OF CURRICULA & TEXTBOOKS IN PAKISTAN (2004) available at <http://www.scribd.com/doc/8572488/Pakistan-Jihad>.

A review of textbooks used in Pakistan has revealed that they promote ideologies inconsistent with religious tolerance in subjects which are compulsory for students. Islamic teaching, including reading and memorizing the Qur'an, is compulsory for all—regardless of their religious faith; and students should be “urged to take the path of *Jehad* [sic] and *Shahadat*.”⁸⁷ The government-required programs promote deep hatred toward Hindus and Indians, and the program requires that the children be “life-sacrificing mujahids,” regardless of their personal faith.⁸⁸ Instructions to teachers to program children to disdain religions other than Islam—instructions that specifically call for jihad against them, in fact—are pervasive throughout the government-created programs.⁸⁹

The government-sponsored schools provide compulsory education for the youngest students in Pakistan, and their curricula are poorly written, factually inaccurate, and completely incompatible with the equal rights promised by Pakistan's own jurisprudence; therefore, many believe that the inculcation of militancy and religious hatred in such schools creates an even greater possibility for violence and terrorist activity than do the madrassas.⁹⁰

5. *Pakistan's Resolution on Combating Defamation of Religions Discusses Fundamental Freedoms, Rights, and Protections that Should Be Afforded to Muslims, but the Pakistani Government Refuses to Offer those Same Freedoms, Rights, and Protections to Pakistani Christians*

In addition, Pakistan notes in its draft resolution on Combating Defamation of Religions that it is deeply concerned about discrimination, violence, and negative media attention related to certain religions, along with the enforcement of laws that target Muslim minorities after September 11—laws that “threaten to impede [Muslims'] full enjoyment of human rights and fundamental freedoms”⁹¹ Pakistan is “alarmed at the inaction of some States to combat this burgeoning trend and the resulting discriminatory practices against adherents of certain religions . . . [and stresses the need] to effectively combat . . . incitement to religious hatred in general and against Islam and Muslims in particular”⁹²

Pakistan also “[s]trongly deplores all acts of . . . physical violence and assaults . . . against persons on the basis of their religion . . . against their businesses, properties, . . . and places of worship”⁹³ However, after numerous attacks on Christians in Shantinagar, Bahawalpur, Sangla Hill, and Kasur, the attacks in Gojra revealed the commitment of extremist Muslims to inflicting even more damage, pain, and suffering on Christians. The mob of Muslims blocked the main roads and railways to keep fire brigades from fighting the fires, thus creating the maximum property damage and injury. Authorities did nothing as local mosques broadcast to all those “who love Muhammad and Islam [to] . . . defend Islam because it is in danger.”⁹⁴ An officer said that he could not find any Muslims responsible for

⁸⁷ *Id.* at 11.

⁸⁸ *See id.* at 19–22.

⁸⁹ *See generally id.* at 9–62, 79–90.

⁹⁰ *Id.* at 1–3.

⁹¹ Combating Defamation of Religions, *supra* note 39.

⁹² *Id.*

⁹³ *Id.* ¶ 3.

⁹⁴ *Pakistan: Christians Burned to Death in Islamist Attacks*, COMPASS DIRECT NEWS, Aug. 1, 2009, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=6039> [hereinafter *Christians Burned to Death*].

the attacks to prosecute—out of a mob of five hundred bearing clubs and wearing clothing indicative of their religious extremism.⁹⁵

Pakistan has “[e]xpress[ed] deep concern . . . that Islam is frequently and wrongly associated with human rights violations”⁹⁶ However, in Korian and Gojra, Islamist extremists attacked Christians and burned down numerous homes in two days, causing their wooden roofs to collapse, and killing at least seven people. As the houses were burning, the mob blocked the streets to keep local firefighters from putting out the flames. Most egregious is the fact that the government had ample warning that violence was imminent: the threat of danger was reinforced when Muslim clerics broadcast the message that all Christian “infidels” should leave if they wanted to save their lives.⁹⁷ These messages were heard by the police.⁹⁸ However, after a major incident of mob destruction in June and another only one day prior to the August 1 incident, the government sent only a handful of police officers in to stop *thousands* of rioters in Gojra.

Yet again, the government of Pakistan is reluctant to prosecute any key Muslim officials, refusing even to formally sanction two officers involved in the Gojra incident whose negligence contributed to the destruction and death.⁹⁹ Muslim clerics are pressuring the government to free clerics named in the FIR.¹⁰⁰ They have also threatened to lynch the father of the boy accused of desecrating the Qur’an, the alleged incident that set off the July 30 and August 1 incidents.¹⁰¹ Though the government has created committees and has initiated a judicial inquiry, similar measures have only resulted in “reconciliation” in past incidents.

The Pakistani government has issued a press release stating that a judicial inquiry into the August 1 attack has begun.¹⁰² An analysis of the various recent attacks and the many cases documented in the Appendix demonstrates that Pakistani authorities have made many such promises to provide justice, but they have rarely fulfilled those promises.¹⁰³ No one involved in the attack in Kasur over a month ago has been arrested; moreover, Christians were forced to not file any charges against the Muslims.¹⁰⁴ The DPO insisted to the victims of the attack in Kasur and NGOs providing relief that Muslims were demanding a blasphemy case be filed against the Christians if they chose to pursue prosecution of those involved in the attack—effectively threatening the Christians with possible death sentences. Most of the attackers in previous incidents are still at large. As of the date of this petition, Pakistani authorities have been successful in forcing the Christians of Kasur not to pursue any charges against the attackers because of their threats of filing a reciprocal blasphemy case against the Christians. Pakistani authorities have forced a “compromise” between the victims of the Kasur attack and the assailants—manipulating the justice system provided by Pakistani law. In November 2005, a similar so-called reconciliation or compromise took place in Sangla Hill

⁹⁵ *Pakistan: Christians Strive for Justice Following Onslaught*, COMPASS DIRECT NEWS, Aug. 5, 2009, <http://compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=6053> [hereinafter *Christians Strive for Justice*].

⁹⁶ Combating Defamation of Religions, *supra* note 39, ¶ 7.

⁹⁷ *Christians Burned to Death*, *supra* note 94.

⁹⁸ *Gojra Attacks Were Pre-planned: HRCP*, *supra* note 8.

⁹⁹ *Christians Strive for Justice*, *supra* note 95.

¹⁰⁰ *Id.*

¹⁰¹ *Id.*

¹⁰² Press Release 294/2009, Ministry of Foreign Affairs of Pakistan, Judicial Inquiry on the Gojra Incident (Aug. 2, 2009), available at http://www.mofa.gov.pk/Press_Releases/2009/Aug/PR_294_09.htm.

¹⁰³ See, e.g., Kasur Field Report, *supra* note 15.

¹⁰⁴ *Id.*

where Muslim rioters destroyed four churches, a convent, and Christian schools after a false blasphemy allegation.¹⁰⁵ Christian victims were forced to withdraw prosecution of the perpetrators in exchange for a withdrawal of a false blasphemy case against one Christian.¹⁰⁶ The state sponsored reconciliation in Kasur and Sangla Hill and lack of prosecution in other incidents shows that peace committees and judicial inquiries would not stop such incidents unless the perpetrators are prosecuted and punished for their acts. Therefore, there needs to be an adequate and constant check on the Pakistani authorities to make sure they prosecute extremists who commit such heinous crimes.

None of the blasphemy accusations has been proven; in fact, the very instance of alleged desecration of the Qur'an in Gojra that provoked violent attacks was disproved by Pakistani officials.¹⁰⁷ Even if such allegations were ever proven true, Pakistani authorities may not stand by and allow mob lynching, murder, looting, and destruction to take the place of police procedure. Such behavior is clearly a violation of the UDHR, ICERD, CAT, ICCPR, the U.N. Charter, and Pakistan's own stated position with regard to fundamental rights that should be afforded its citizens. Lack of prosecution in cases of religious violence evidences the Pakistani authorities' acquiescence and disinterest in providing the rule of law to its religious minorities, thus deviating from international human rights standards.

VI. RECOMMENDATIONS

The Pakistani government must prosecute acts of violence based upon religion. Only when the government effectively prosecutes the perpetrators will such acts of violence against minorities stop. The current judicial inquiry will be futile until the government prosecutes the assailants who created havoc on June 30, July 30, and August 1, 2009. Prosecution in such cases is the only deterrent for those who attack innocent minorities on a mullah's call.

More than two decades of blasphemy laws have taught Pakistani Muslims that the punishment for allegedly insulting Islam is death. The Pakistani government must repeal or procedurally change blasphemy laws, providing the same punishment for wrongfully filed case as is provided for violating the blasphemy laws. If the government is not capable of repealing the blasphemy laws, then the law should at least be non-discriminatory. It must include the same punishment for insulting prophets of other religions that it prescribes for insulting Muhammad.

¹⁰⁵ See Appendix ¶ 16.

¹⁰⁶ *Id.*

¹⁰⁷ See *supra* note 11 and accompanying text.

APPENDIX

1. In August of 2009 in Lahore, an angry mob attacked a 60-year-old woman, alleging that the women desecrated the Qur'an.¹ The government promised the angry mob that the woman would be prosecuted; however, the mob wanted the woman to be handed over to them.²
2. Also in August of 2009 in Lahore, a factory owner and two other people were killed because they allegedly desecrated the Qur'an.³ The factory owner was taking down an outdated calendar that contained verses from the Qur'an. A worker saw this and claimed that the owner was desecrating the Qur'an. The man ended up gathering his co-workers at the factory and, as a group, approached the owner. Out of defense for the owner, a guard shot his gun into the air. The mob shot back and killed the men.
3. On October 8, 2008, members of the Taliban bombed a Catholic Girl's School in Swat Valley.⁴ There were no injuries, but subsequent to the bombing, the Taliban ransacked the school, causing serious damage. This bombing is one of about 150 similar school bombings over the last two years.⁵ Many of the schools under attack are Christian.⁶ The same school closed in September of 2007 because of threats it received from a Muslim extremist; the extremist demanded that the women of the school wear the traditional burka. They also claimed that the faculty was attempting to convert Muslim students to Christianity.⁷
4. In October of 2007, 300 Muslims attacked and vandalized a Pakistani church in Gowindh, Pakistan. Muslims were angered that the church was using its loudspeaker to call Christians to an early morning prayer meeting at 6:00 a.m., claiming that it was disrupting the Muslim call to prayer, which occurs at 5:00 a.m.⁸ The attack was spurred on by a local Muslim who had recently returned from military training in Kashmir.⁹ These locals have been tormenting Christians by parading around the town exclaiming, "Become Muslims or be prepared to fight or die."¹⁰ They also accused the church members of being U.S. agents converting Muslims to Christianity.¹¹ Police eventually responded and stopped further violence; however, it took them twelve hours to respond due to poor road conditions and because the church members did not

¹ Another 'Blasphemy' Case, DAILY TIMES, Aug. 6, 2009, available at http://www.dailytimes.com.pk/default.asp?page=2009\08\06\story_6-8-2009_pg1_7.

² *Id.*

³ 'Blasphemy' Claims three more Victims, DAILY TIMES, Aug. 5, 2009, available at http://www.dailytimes.com.pk/default.asp?page=2009\08\05\story_5-8-2009_pg1_10.

⁴ Pakistan: Taliban Bombs Catholic Girls' High School, COMPASS DIRECT NEWS, October 14, 2008, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=5633& backpage=archives&critere=&countryname=Pakistan&rowcur=25>.

⁵ *Id.*

⁶ *Id.*

⁷ *Id.*

⁸ Pakistan: Muslims Apologize for Attack on Church, COMPASS DIRECT NEWS, Oct. 25, 2007, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=5094& backpage=archives&critere=&countryname=Pakistan&rowcur=25>.

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

have phones to report the violence. No charges were brought against the Muslims who attacked the Church.¹²

5. In June of 2007, seven church members were injured when forty-one Muslim villagers attacked the Salvation Army Church in Chak 248, Pakistan, after the church used a loudspeaker to broadcast an invitation to attend an authorized evangelistic meeting.¹³ The attackers carried guns, axes, and wooden sticks, which they used to hit the members as they were preparing the meeting. No charges were filed in that the attack. One day prior to the assault on the church, the same attackers broke into the pastor's house, injured his son and daughter, and warned him to cancel the evangelistic meeting the next day.¹⁴ The Muslims and Christians settled out of court; although the settlement was unfair, many called it prudent because the authorities were admittedly biased toward the Muslims. Most cases such as these end up in compromise due to a lack of government willingness to prosecute. One police officer stated in the complaint that the Christians were trying to turn this into a religious matter so that they could seek asylum abroad.¹⁵
6. In April of 2007, during a celebration of Mohammed's birthday, Muslim rioters in Toba Tek Singh, attacked Christian homes in response to false claims that several Christians had attacked a Muslim man and desecrated a sticker bearing the name of Mohammed.¹⁶ The rioters injured dozens of Christians and badly beat one man who was hospitalized after police with batons broke up the mob.¹⁷ The Muslims filed an FIR charging the man with blasphemy, which they claimed incited the violence; however, the Christians claimed that the violence arose from a disagreement between two small children that erupted into a confrontation between the Christian and Muslim families of the children.¹⁸
7. On November 12, 2006 in Lahore's Talab Sarai village, armed and drunken Muslims attacked the congregation of a local church.¹⁹ Ten men broke lights and a cross outside the church while the congregation was filing a complaint against the men for harassment earlier that day.²⁰ The harassment earlier that day happened when the two intoxicated Muslims approached the church, swearing at the

¹² *Id.*

¹³ *Pakistan: Muslim Mob Confesses to Church Attack*, COMPASS DIRECT NEWS, July 16, 2007, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=4944&backpage=archives&critere=&countryname=Pakistan&rowcur=25>; *Pakistan: Mob Assaults Christians With Axes, Guns*, COMPASS DIRECT NEWS, June 20, 2007, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=4918&backpage=archives&critere=&countryname=Pakistan&rowcur=50>.

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ U.S. DEP'T OF STATE: BUREAU OF DEMOCRACY, HUMAN RIGHTS & LABOR, INTERNATIONAL RELIGIOUS FREEDOM REPORT 2007: PAKISTAN, available at <http://www.state.gov/g/drl/rls/irf/2007/90233.htm>. [hereinafter INTERNATIONAL RELIGIOUS FREEDOM REPORT 2007].

¹⁷ *Pakistan: Easter Tense Following Anti-Christian Attack*, COMPASS DIRECT NEWS, April 6, 2007, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=4828&backpage=archives&critere=&countryname=Pakistan&rowcur=50>.

¹⁸ *Id.*

¹⁹ INTERNATIONAL RELIGIOUS FREEDOM REPORT 2007, *supra* note 16.

²⁰ *Pakistan: Drunken Mob Vandalizes Church*, COMPASS DIRECT NEWS, Nov. 20, 2006, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=4645&backpage=archives&critere=&countryname=Pakistan&rowcur=50>.

members; they were driven off by those inside.²¹ However, they returned later with a mob that began to attack the two men who had challenged the Muslims earlier. The rest of the church members came outside to settle the conflict.²² The police were called out to the site of the Church when the men returned and began throwing stones at the church. However, the police did not arrest the men but rather arrested three young bystanders who were present, releasing them shortly after.²³

8. In October 2006, in Faisalabad, 400 to 500 Muslims attacked and attempted to lynch two elderly Christians who were accused of burning pages of the Qur'an.²⁴ The crowd was unsuccessful. The two Christians were tried in a court under the blasphemy laws and sentenced to ten-year prison terms.²⁵
9. Land disagreements have also been a frequent source of violence in Pakistan.²⁶ On August 7, 2006, in Mominpura Thaiki, Pakistan, three Christian men were hospitalized with serious hatchet wounds and one more man remains missing after an attack instigated by a man who wanted the land on which the church is located. The attackers threw several hand grenades inside the church, desecrated the Bibles and hymnals, stole everything of value, and damaged two adjacent houses.²⁷ After the men terrorized the church and its members, the Christians went to the police to file an FIR but were turned away.²⁸ However, the Muslims were allowed to file an FIR claiming that the Christians had "opened fire" on them. The Christians filed an amendment to the FIR claiming that the Muslims had created riots, damaged the church, and harassed the villagers. However, the Muslims were awarded pre-arrest bail—posted by the nazim (Mayor) of the village. Later that evening, the Muslims returned to the church with thirty men armed with machine guns and attacked the Christian women while the men were at the market or in the fields.²⁹ They beat several and were only driven off when the Christians grabbed guns and fought back. The police chief and his assistant were suspended for "negligence and sheltering the culprits" by the district police chief, and the man responsible for the attacks was accused under Pakistan's Anti-terrorism law and later arrested along with two of his sons.³⁰ This is one of the very few incidents in which the assailants were arrested and charged. This is evidence that the authorities are capable of arresting and charging the assailants, and that there is a law in place to govern such actions. Thus, the question is not whether the government can do anything but rather whether the government is willing to use its power.

²¹ *Id.*

²² *Id.*

²³ *Id.*

²⁴ *Pakistan: Fear of the Holy*, COMPASS DIRECT NEWS, Oct. 12, 2006, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=4580&backpage=archives&critere=&countryname=Pakistan&rowcur=50>.

²⁵ *Id.*

²⁶ INTERNATIONAL RELIGIOUS FREEDOM REPORT 2007, *supra* note 16.

²⁷ *Pakistan: Muslim Land-Grabbers Attack Christians*, COMPASS DIRECT NEWS, Aug. 18, 2006, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=4495&backpage=archives&critere=&countryname=Pakistan&rowcur=50>.

²⁸ *Id.*

²⁹ *Id.*

³⁰ *Id.*

10. In early 2006, a Danish magazine published a caricature drawing of the Prophet Mohammed. The publication incited strings of violence in Pakistan throughout February 2006. On February 19, 2006, 500 Muslim rioters attacked two Pakistani churches, gutting and burning them, after reports emerged alleging that a Christian man blasphemed the Qur'an by throwing it in the trash.³¹ The alleged blasphemy started a small attack on the church, and despite the pastor's call to the police at that time, no police arrived until after a group of 500 began to attack as well, two hours later. The Governor of Sindh ordered the police to protect all religions because violence had increased due to the cartoon drawings.³² However, the reports are inconsistent about the number arrested, with numbers ranging from 100-200. However, there are no reports that they were charged or prosecuted. It has yet to be seen whether the government will follow through on its promise to rebuild the area.³³ The local Priest said he does not know when the government will act.³⁴
11. On February 17, 2006 in Kasur a violent mob of several thousand Muslims attacked a Christian girls' school, breaking windows and throwing bricks, on account of the caricature mentioned above; the incident required police to break up the protestors.³⁵ There are no reports that assailants were ever arrested.
12. On February 15, 2006 in Peshawar, 60,000 Muslim demonstrators vandalized and destroyed several Christian institutions including a convent, a girl's school, and a hospital— all run by the Church of Pakistan.³⁶ Two died in the riots which included attacks on fast food restaurants, a Norwegian mobile firm, and 16 South Korean buses. The violence was a result of the caricatures of Mohammed that were published in the Danish magazine.
13. On February 14–15, 2006, in Lahore, tens of thousands of Muslims rioted in the streets after the Danish magazine published the caricature.³⁷ The military was called in to put an end to the riots after two people died, and the resulting conflict between rioters and the military resulted in another death. After the riots, a Christian internet café owner was arrested on false allegations that he displayed a caricature of the Prophet Mohammed in his café; however, he was later released after the police uncovered the plot to frame him by the local Muslims.
14. On February 13, 2006, university students and members of an Islamic organization in Peshawar vandalized a missionary school.³⁸ The crowd smashed windows with bricks and steel rods, destroying the school's library, science block, main hall, and administrative buildings, all in response to the drawings of Mohammed.

³¹ *Pakistan: Churches Torched Over Blasphemy Rumor*, COMPASS DIRECT NEWS, Feb. 20, 2006, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=4221&backpage=archives&critere=&countryname=Pakistan&rowcur=50>.

³² *Id.*

³³ *Id.*

³⁴ *Id.*

³⁵ *Pakistan: Cartoon Protestors Target Christians*, COMPASS DIRECT NEWS, Feb. 20, 2006, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=4220&backpage=archives&critere=&countryname=Pakistan&rowcur=50>.

³⁶ *Id.*

³⁷ *Id.*

³⁸ *Id.*

15. On February 3, 2006, a group of twenty Muslim women and a few men attacked a church, injuring two Christian women and breaking windows, smashing the altar, and burning Bibles.³⁹ The government refused to allow the Christians to file a complaint.⁴⁰ However, they allowed a wealthy nearby landowner to file a complaint against the Christians for allegedly inciting the fight that led to the church destruction. Sources claim that the eight Christians accused in the FIR were not even at the church at the time.⁴¹ The police claim that they refused to start the case because it would cost too much time and money and the Christians would not be able to pay. The attack stemmed from a land dispute between the wealthy landowner and the church. The landowner was arrested after he encroached on the church's land and then promised retribution. The National Council of Churches (NCC) in Pakistan "released a statement calling on the Punjab government to come out of its 'slumber' and address minority issues" and avoid an issue that could be like "the government's failure last year to prosecute the perpetrators of violence against churches in the town of Sangla Hill."⁴²
16. On November 12, 2005 in the Punjabi town of Sangla Hill, two thousand Muslims rioted and destroyed four churches, a convent and Christian Schools.⁴³ Muslims did this in response to the alleged burning of pages from the Quran by a Christian man.⁴⁴ The Church officials called for police protection when they heard the mosque announcement to teach the Christians a lesson; however, the police never came, and some even claim that the police were among the crowd that caused the damage.⁴⁵ Also, the police arrested and tortured four of the Christian man's brothers, prompting him to give himself up for their freedom. Later, Islamic leaders called for the public execution of the man accused of blasphemy and for the release of the eighty-eight Muslims who were arrested for the attack on the churches.⁴⁶ Christians say that the man was a scapegoat because the main witness to the alleged burning said later that he never saw the man who burnt the room housing the pages. Furthermore, reports emerged that the fire was actually started by a man who owed the Christian man money from a gambling debt and who set fire and blamed the Christian to avoid paying him.⁴⁷ On January 5, 2006 as a part of a deal to reconcile the violence between the Christians and Muslims, both parties withdrew charges against each other.⁴⁸ Local Christians said that Muslim political leaders and religious clerics were forcing Christians to compromise and withdraw charges against the criminals. A deal was struck where both parties settled—resulting in the blasphemy charges being dropped against the Christian and the Christians dropping the violence charges against the

³⁹ *Pakistan: Women Vandalize Catholic Church*, COMPASS DIRECT NEWS, Feb. 8, 2006, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=4208& backpage=archives&critere=&countryname=Pakistan&rowcur=50>.

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² *Id.*

⁴³ INTERNATIONAL RELIGIOUS FREEDOM REPORT 2007, *supra* note 16.

⁴⁴ *Pakistan: Muslim Clerics Demand Hanging of 'Quran Desecrater'*, COMPASS DIRECT NEWS, Dec. 8, 2005, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=4102& backpage=archives&critere=&countryname=Pakistan&rowcur=75>.

⁴⁵ *Id.*

⁴⁶ *Id.*

⁴⁷ *Id.*

⁴⁸ *Pakistan: Accuser Drops 'Blasphemy' Charge in Sangla Hill Case*, COMPASS DIRECT NEWS, Jan. 11, 2006, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=4167& backpage=archives&critere=&countryname=Pakistan&rowcur=75>.

Muslims who attacked and destroyed the pastor's residence.⁴⁹ The government promised to pay to rebuild the buildings destroyed, including the churches, and former President Musharraf has called for more tolerance; however, the government is doing little to help.⁵⁰ In fact, local leaders have displayed their frustrations: "It is a very frustrating situation where the government was not doing its duty," said Peter Jacob of the National Council for Justice and Peace. "They were just exploiting the situation, and you see it is not a just solution. It is not what we had expected."⁵¹

17. In Lahore on September 10, 2005, a Muslim mob of 200 ransacked 16 Christian homes after a drug addict, associated with the Christian church, was accused of insulting the prophet Mohammed.⁵² The accused allegedly interrupted a religious meeting of Muslims and Christians and argued with the local Imam before allegedly making the blasphemous remarks.⁵³ The man was beaten and then returned the next day throwing bricks at the Imam's house. Several Muslims attacked and severely beat him and partially disrobed his wife. The Imam then filed an FIR claiming that the accused had blasphemed Mohammed; the FIR sparked a backlash towards Christians as Muslims called for vengeance.⁵⁴ The police who were called in to protect the Christians did nothing; they went to the home of a local councilor until the violence was over.⁵⁵ The attack came on the heels of announcements made over mosque loudspeakers throughout the community that a police sub-inspector had desecrated the Qur'an. The police gave a statement that 300 rioters were arrested and another 2,000 booked for disorderly conduct in the ensuing melee.⁵⁶ However, there are no reports that they were ever prosecuted for their acts.
18. In the years immediately following the U.S.-led incursion, into Afghanistan and Iraq, the outbreaks of violence were extreme. On March 27, 2005 in the Khamba village, Wapda Town Phase II, armed gunmen attacked Christian worshippers as they emerged from Easter Sunday services.⁵⁷ They killed one and injured seven others.⁵⁸ The police arrested two of the four assailants; however, the other two escaped. Police had been assigned to protect the church; however, they left their posts before the shooting started.⁵⁹ The shooting started over a property dispute between the man who died and two of the gunmen.⁶⁰ However, the

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ *Id.*

⁵² INTERNATIONAL RELIGIOUS FREEDOM REPORT 2007, *supra* note 16; *Pakistan: Muslim Mob Attacks Christian Homes*, COMPASS DIRECT NEWS, Sep. 13, 2005,

<http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=3956&backpage=archives&critere=&countryname=Pakistan&rowcur=75>. [hereinafter *Muslim Mob Attacks Christian Homes*].

⁵³ *Muslim Mob Attacks Christian Home*, *supra* note 52.

⁵⁴ *Id.*

⁵⁵ *Id.*

⁵⁶ *Id.*

⁵⁷ U. S. DEP'T OF STATE: BUREAU OF DEMOCRACY, HUMAN RIGHTS & LABOR, INTERNATIONAL RELIGIOUS FREEDOM REPORT 2006: PAKISTAN *available at* <http://www.state.gov/g/drl/rls/irf/2006/71443.htm>. [hereinafter INTERNATIONAL RELIGIOUS FREEDOM REPORT 2006]; *see also Pakistan: Worshippers Attacked on Easter Sunday*, COMPASS DIRECT NEWS, Mar. 28, 2005,

<http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=3732&backpage=archives&critere=&countryname=Pakistan&rowcur=75>. [hereinafter *Worshippers Attacked on Easter Sunday*].

⁵⁸ *Worshippers Attacked on Easter Sunday*, *supra* note 57.

⁵⁹ *Id.*

⁶⁰ *Id.*

police blamed the shooting on the Christians, whom they said attacked the Muslims first and provoked the shooting.⁶¹ The police distorted the FIR that was filed on behalf of the deceased by encouraging his father to leave, thereby provoking his father to repudiate it later.⁶²

19. On January 14, 2004, in Karachi, a man detonated a bomb in a Bible society book shop and was later arrested. The government promised to repair the damage that occurred.⁶³
20. In a Christmas Day massacre on December 25, 2002 in Chianwali, two Muslim militants threw grenades into a Christian church during a performance, killing three young girls and injuring thirteen.⁶⁴ The men were arrested but were released on bail.⁶⁵ The Christians in the community have consistently been threatened to drop the case against the two men who were greeted with celebration upon their release from prison on bail.⁶⁶ Shortly after the incident, the police accused those who were the victims of the massacre of starting the attack.⁶⁷
21. On September 25, 2002 in Karachi's Rimpa Plaza, seven Christians were tied up, gagged and then shot in the head at the Institute of Peace and Justice by members of the terrorist organization Tehrik-e-Islami Lashker-e-Mohammedi, which was created to "target missionaries propagating their beliefs in Pakistan."⁶⁸ The gunmen killed seven and critically injured another.⁶⁹ The police held and tortured one of the Christian survivors of the attack because they thought he was involved. Some years after the incident, the families of the victims were frustrated with the government's response. Instead of investigating the individuals who made an attack in the middle of the day, "the church spokespersons stressed, some police officials had harassed the bereaved families and spread false rumors to implicate local Christians for the tragedy."⁷⁰ However, on February 26, 2008, the men responsible for the attack were

⁶¹ *Id.*

⁶² *Id.*

⁶³ INTERNATIONAL RELIGIOUS FREEDOM REPORT 2006, *supra* note 57; *Pakistan: Police Arrest Karachi Bombing Suspect*, COMPASS DIRECT NEWS, Jan. 19, 2004, <http://www.compassdirect.org/en/display.php?page=news&idelement=2622&lang=en&length=short&backpage=archives&critere=&countryname=Pakistan&rowcur=100>.

⁶⁴ U. S. DEP'T OF STATE: BUREAU OF DEMOCRACY, HUMAN RIGHTS & LABOR, INTERNATIONAL RELIGIOUS FREEDOM REPORT 2003: PAKISTAN *available at* <http://www.state.gov/g/drl/rls/irf/2003/24473.htm>. [hereinafter RELIGIOUS FREEDOM REPORT 2003]; *Pakistan: Three Christians Lose Eyesight in Christmas Assault*, COMPASS DIRECT NEWS, Jan. 13, 2003, <http://www.compassdirect.org/en/display.php?page=news&idelement=1762&lang=en&length=short&backpage=archives&critere=&countryname=Pakistan&rowcur=100>.

⁶⁵ *Pakistan: Accused Terrorists Given Bail*, COMPASS DIRECT NEWS, Dec. 15, 2003, <http://www.compassdirect.org/en/display.php?page=news&idelement=2491&lang=en&length=short&backpage=archives&critere=&countryname=Pakistan&rowcur=100>.

⁶⁶ *Id.*

⁶⁷ *Id.*

⁶⁸ RELIGIOUS FREEDOM REPORT 2003, *supra* note 64; *see also Pakistan: Suspects from 2002 Karachi Massacre Arrested*, COMPASS DIRECT NEWS, Mar. 7, 2008, <http://www.compassdirect.org/en/display.php?page=news&lang=en&length=long&idelement=5282&backpage=archives&critere=&countryname=Pakistan&rowcur=25> [hereinafter *Suspects From 2002 Karachi Massacre Arrested*].

⁶⁹ *Suspects from 2002 Karachi Massacre Arrested*, *supra* note 68.

⁷⁰ *Id.*

arrested and confessed to the murders.⁷¹ The same men also confessed to the murder of Catholic lay leader Aven Adven who was killed by lethal injection on May 22, 2002.⁷²

22. Four Christian nurses died and twenty others were injured on August 9, 2002 in Taxila, when Muslim attackers threw grenades into a Christian hospital after the staff was emerging from a morning worship service.⁷³
23. A few days earlier on August 5, 2002, six died when gunmen burst onto the campus of a Christian school and opened fire.⁷⁴
24. In April 2002, Muslim militants attacked the international church with grenades. Five worshipers died and forty were wounded.⁷⁵
25. In the first of the major attacks after the U.S. began operations in Afghanistan after September 11, five masked militants gunned down sixteen at a church service in Bahawalpur on October 28, 2001.⁷⁶ They killed the pastor, fourteen members of his congregation, and a Muslim policeman.⁷⁷
26. On May 27, 1998 in Gojra, eight thousand Muslim rioters attacked the Bishop's residence and church of the Church of Pakistan.⁷⁸ The riot was incited by a Muslim Cleric who claimed someone had tried to burn copies of the Qur'an. The Christians called for police support after the Muslim call for aggression.⁷⁹ Several police officers were sent to protect the church, but they were no match for the mob and were easily pushed aside as the mob began pelting the church and Bishop's house with rocks. The police eventually subdued the crowd with teargas and batons.⁸⁰ While some civil buildings were damaged, the majority of the crowd's anger was directed toward the church. The copies of the Qur'an that had been burned had been stored after several Muslims were arrested in 1993 for trying to sell them.⁸¹ The police said that the fire

⁷¹ *Id.*

⁷² *Id.*

⁷³ RELIGIOUS FREEDOM REPORT 2003, *supra* note 64; see also *Pakistan: Nurses Killed in Grenade Attack*, COMPASS DIRECT NEWS, Sept. 13, 2002, <http://www.compassdirect.org/en/display.php?page=news&idelement=1576&lang=en&length=short&backpage=archives&critere=&countryname=Pakistan&rowcur=100>.

⁷⁴ RELIGIOUS FREEDOM REPORT 2003, *supra* note 64; see also *Pakistan: Extremists Attack Missionary School*, COMPASS DIRECT NEWS, Sept. 13, 2002, <http://www.compassdirect.org/en/display.php?page=news&idelement=1575&lang=en&length=short&backpage=archives&critere=&countryname=Pakistan&rowcur=100>.

⁷⁵ *Pakistan: International Church Attacked in Pakistan*, COMPASS DIRECT NEWS, Apr. 19, 2002, <http://www.compassdirect.org/en/display.php?page=news&idelement=1214&lang=en&length=short&backpage=archives&critere=&countryname=Pakistan&rowcur=125>.

⁷⁶ RELIGIOUS FREEDOM REPORT 2003, *supra* note 64; see also *Pakistan: Christians Mourn Massacre Victims*, COMPASS DIRECT NEWS, Nov. 16, 2001, <http://www.compassdirect.org/en/display.php?page=news&idelement=1071&lang=en&length=short&backpage=archives&critere=&countryname=Pakistan&rowcur=125>.

⁷⁷ *Id.*

⁷⁸ Asawal Sardar, *Riots in Faisalabad*, in 1998 REPORTS FROM PAKISTAN (Int'l Assoc. for Religious Freedom, ed. 1998), available at <http://www.geocities.com/~iarf/pakreport.html#riotsin>.

⁷⁹ *Id.*

⁸⁰ *Id.*

⁸¹ *Id.*

was either caused by those Muslims trying to destroy the evidence of their crime or by an electrical short.⁸²

27. In 1998, a Catholic Bishop committed suicide in response to a Christian man being sentenced to life in prison for an alleged blasphemy charge.⁸³ In response, Christians across Pakistan decided to protest the blasphemy laws only to face more opposition. In Karachi, shortly after the Bishop's death, ten thousand Christians gathered to protest. A group of Muslims decided to attack a small group of the protesters, leaving five Christians injured, one in critical condition.⁸⁴ In Karachi, a few days after the protests, a Muslim policeman opened fire indiscriminately on Christian youths, killing three Christians and a Muslim.⁸⁵ Allegedly, the policemen were trying to take revenge for the tension that was caused by the recent protests; none of the policemen involved have been arrested as of the time of this report.⁸⁶ Moreover, the day after the Bishop died, a group of Muslim militants burned homes and shops in a Christian neighborhood in northeastern Pakistan while the large protests were occurring.⁸⁷
28. Finally, in 1997, a Christian town named Shantinagar was looted and destroyed by Muslims, some of whom were part of the Pakistani government.⁸⁸ Local police made apparently frivolous charges alleging that a Christian man desecrated a copy of the Qur'an; those charges were used to incite a large mob.⁸⁹ In the end, hundreds of homes and twelve churches were destroyed by the mob, leaving 20,000 people homeless because of the destruction that occurred.⁹⁰ Some members of the destroyed community went to Karachi to protest the egregious act but only received a beating from the Pakistani officials instead.⁹¹ With a sudden change of heart, mainly due to international pressure, the Pakistani government briefly deployed the military to the area, and high ranking officials visited. They rebuilt roughly 200 buildings. The police officers who made the charges, however, were only temporarily suspended. All of them ended up continuing on the police force, and none of the mobsters were arrested or prosecuted.⁹²

⁸² *Id.*

⁸³ U.S. DEP'T OF STATE: BUREAU OF DEMOCRACY, HUMAN RIGHTS & LABOR, ANNUAL REPORT ON INTERNATIONAL RELIGIOUS FREEDOM REPORT FOR 1999: PAKISTAN available at http://www.state.gov/www/global/human_rights/irf/irf_rpt/1999/irf_pakistan99.html. [hereinafter RELIGIOUS FREEDOM REPORT 1999].

⁸⁴ Asawal Sardar, *Bishop John Joseph Laid to Rest Amid Tension*, in 1998 REPORTS FROM PAKISTAN (Int'l Assoc. for Religious Freedom, ed. 1998), available at <http://www.geocities.com/~iarf/pakreport.html#laid>.

⁸⁵ *Id.*

⁸⁶ *Id.*

⁸⁷ The Associated Press, *Pakistani Catholic Cleric Buried; Muslims Burn Christian Homes*, in 1998 REPORTS FROM PAKISTAN (Int'l Assoc. for Religious Freedom, ed. 1998), available at <http://www.geocities.com/~iarf/pakreport.html#riotsin>.

⁸⁸ RELIGIOUS FREEDOM REPORT 1999, *supra* note 83.

⁸⁹ *Id.*

⁹⁰ *Id.*

⁹¹ Margaret Sitte, *Where Is Action Against Persecution of Christians?*, BISMARCK TRIBUNE, Nov. 14, 1997, at 04A.

⁹² RELIGIOUS FREEDOM REPORT 1999, *supra* note 83.