

**STATUS OF HUMAN RIGHTS IN THE PRINCIPALITY OF UNITED ARAB EMIRATES  
FOR THE 43<sup>RD</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. This report discusses the status of human rights in the Principality of the United Arab Emirates (UAE) for the 43rd session of the Universal Periodic Review (UPR).

**Background**

2. The UAE is located in the Middle East with a population of approximately 9.9 million people.<sup>1</sup> The UAE is predominately Muslim, with approximately 76% of the population identifying as Muslim, 9% as Christian, and 15% as other.<sup>2</sup>

3. The UAE's previous review was held on January 22, 2018.<sup>3</sup> As a result of the UPR, the UAE received 232 recommendations, 132 of which the UAE supported.<sup>4</sup> The UAE received several recommendations regarding human trafficking.<sup>5</sup> One recommendation made by Japan and supported by the UAE was that the government “[f]ully implement the National Committee to Combat Human Trafficking Strategic Plan and the relevant federal laws, in order to combat human trafficking issues, including the sexual exploitation of children.”<sup>6</sup> The UAE also supported Cuba's recommendation to “[s]trengthen the efforts of the National Committee to Combat Human Trafficking.”<sup>7</sup> Lebanon and the United Kingdom of Great Britain and Northern Ireland made, and the UAE supported, recommendations to increase support of trafficking victims.<sup>8</sup> The United States of America recommended the UAE to “[d]emonstrate greater respect for freedoms of expression and peaceful assembly.”<sup>9</sup> This recommendation was only noted by the UAE.<sup>10</sup>

4. Additionally, despite the UAE having blasphemy and anti-proselytization laws, there were no specific recommendations regarding religious liberty.

**Legal Framework**

*Human Trafficking*

5. Article 34 of the Constitution states: “A person may not be enslaved.”<sup>11</sup>

6. The UAE Federal Law No. (51) of 2006 on Combating Human Trafficking Crimes As amended under Federal law No. (1) of 2015 criminalizes human trafficking.<sup>12</sup> Article 2 of the law sets a penalty of at least five years imprisonment, which can be increased to life imprisonment for certain cases as set out in Article 2, including “[i]f the victim is a child.”<sup>13</sup> Article 2 also imposes “a fine of no less than one hundred thousand [dirhams].”<sup>14</sup> The law defines a child as “[a]ny person who is under 18 years old.”<sup>15</sup> Article 9 requires that foreigners who are guilty of human trafficking be deported.<sup>16</sup>

7. The UAE is a party to the Convention on the Rights of the Child (CRC).<sup>17</sup> Article 34 of the CRC requires that “States Parties undertake to protect the child from all forms of sexual exploitation and sexual abuse.”<sup>18</sup> Article 36 requires protection against “all other forms of exploitation prejudicial to any aspects of the child's welfare.”<sup>19</sup>

8. Additionally, the UAE is a party to the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.<sup>20</sup> Under Article 9 of this Protocol:

1. States Parties shall establish comprehensive policies, programmes and other measures:

(a) To prevent and combat trafficking in persons; and

(b) To protect victims of trafficking in persons, especially women and children, from revictimization.<sup>21</sup>

#### *Freedom of Religion, Expression, and Peaceful Assembly*

9. Article 7 of UAE's Constitution states that "Islam is the official religion of the UAE. The Islamic Shari'a is a main source of legislation."<sup>22</sup> It does go on to provide basic human rights but inserts restrictions. Article 25 states, "[t]here shall be no distinction among the citizens of the UAE on the basis of race, nationality, faith, or social status."<sup>23</sup> Article 32 provides "[f]reedom to exercise religious worship" but adds a limitation that only when "such freedom is consistent with the public policy or does not violate the public morals."<sup>24</sup> Article 33 continues by providing for "[f]reedom of assembly and establishing associations . . . as provided in law."<sup>25</sup>

10. Despite the fact that Article 25 of the Constitution states that there shall be no distinction of UAE citizens due to faith, as stated above, Article 7 of the Constitution establishes "Islamic Shari'a" as "a main source of legislation in the UAE."<sup>26</sup> Therefore, Article 319 of the UAE Federal Law Number 3 of 1987 criminalizes proselytization by imposing a prison sentence of up to five years for vilification of the Muslim faith, preaching of other religions, and doctrine which vilifies the Muslim faith,<sup>27</sup> and Article 320 prohibits meetings which are held for the same purposes prohibited in Article 319.<sup>28</sup> The penalty for such meetings is a prison sentence of five to ten years.<sup>29</sup>

11. Moreover, despite the Constitution providing for freedom of religious worship, "[b]ecause there is no path to citizenship in the UAE, religious minorities are not allowed to own land," which makes the construction of non-Muslim places of worship extremely difficult.<sup>30</sup> Religious minorities rely on land that has been granted by government officials, and the "expansion of non-Muslim houses of worship is tightly controlled."<sup>31</sup> Further, there are laws that "forbid the building of bell towers and displaying symbols such as crosses on roofs."<sup>32</sup>

12. Article 1 of the UAE Federal Decree No. 2 of 2015 on Combatting Discrimination and Hatred defines "[d]iscrimination" as "[a]ny distinction, restriction, exclusion or preference among individual groups based on the ground of religion, creed, doctrine, sect, caste, race, colour or ethnic origin."<sup>33</sup> Article 6 sets the penalty for discrimination as an imprisonment of at least five years and/or a fine of 500,000 to 1,000,000 dirhams.<sup>34</sup>

13. Once again, despite Article 1's broad protection of religious discrimination, it really only protects Islam as it goes on to define "[b]laspemy" as "any act of insulting or showing contempt for God [Allah], to religions, prophets or messengers, holy books or places of worship according to the provisions of this Decree Law."<sup>35</sup> Article 4 details the crime of blasphemy as "[o]ffending, showing contempt or irreverence toward the Divine Entity"; "[o]ffending, insulting, challenging, defaming or disrespecting any religion or any of its

rituals or sacred things, or disrupting or preventing licensed religious observances or ceremonies by violence or threat”; “[d]istorting, destroying, desecrating or insulting, in any way, any of the holy books”; “[i]nsulting, disrespecting, offending or defaming one of the messengers or their spouses, family or companions”; and “[d]estroying, damaging or desecrating the sanctity of places of worship, cemeteries or graves, appurtenances or any of their contents.”<sup>36</sup> Article 5 of the law sets penalties for Article 4 violations as at least five years imprisonment and/or a fine of 250,000 to 2,000,000 dirhams.<sup>37</sup>

14. Article 312 of the UAE Federal Law Number 3 of 1987 also only protects Islam, as it criminalizes “[o]ffense to any of the Islamic sacred beliefs or rites,” “[i]nsult to any of the divine recognized religions,” and “[a]pproving, encouraging or promoting sin or do any act that tempts towards committing it.”<sup>38</sup> It prescribes a penalty of “detention and/or a fine” and a penalty of at least one year and a fine if the act is done publicly.<sup>39</sup>

15. In 2020, the UAE amended its penal code to remove the death penalty from some Islamic crimes, including apostasy.<sup>40</sup>

16. The UAE is not a party to the International Covenant on Civil and Political Rights (ICCPR).<sup>41</sup>

### **Human Trafficking**

17. Between “2020-2021, the UAE prosecuted 54 people in 19 sex trafficking cases and found 15 individuals guilty.”<sup>42</sup> However, the extent of sex trafficking is way larger than these numbers would suggest. A 2019 investigation “estimated that in Dubai alone 45,000 women are trapped in the prostitution network.”<sup>43</sup> Many sex trafficking victims are lured to the UAE by offers of good paying jobs, but instead find themselves trapped in prostitution.<sup>44</sup> Additionally, while labor trafficking is also an extremely large issue in the UAE, this report will focus only on sex trafficking.

18. The UAE has increased anti-sex trafficking efforts through its National Committee to Combat Human Trafficking.<sup>45</sup> It implemented a plan of “[p]revention, [p]rosecution, [p]unishment, [p]rotection, and [p]romotion.”<sup>46</sup> Some of the measures include shelters, support services, “a 24-hour trafficking hotline,” and detection training programs.<sup>47</sup>

19. However, despite the new plan, it seems that the victims are being targeted instead of the traffickers. Women, whose job hopes turn into forced prostitution, face jail time, because prostitution violates Sharia law.<sup>48</sup> While “Emirati authorities crack down on the brothels, the women victims of the trafficking are often the ones who are prosecuted, rather than the traffickers.”<sup>49</sup> These women often find themselves forced to either remain in prostitution, go to jail, or be deported.<sup>50</sup> One victim of prostitution explained the dilemma as she was forced to decide between staying “in the abusive working environment or end up on the street and face potential punishment from the government for becoming ‘undocumented.’”<sup>51</sup> Many of the victims from foreign countries “do not have access to their countries’ embassies or are not taken seriously by them. And since many seek to leave the country, or do not stay for a long period of time, their cases are not addressed, meaning that exploitative employers have freedom to abuse female migrant workers like this.”<sup>52</sup>

20. In most of the examples of human trafficking found, the women were lured by false promise of a lucrative job. Additionally, in at least one instance, due to irregularities surrounding their passports and immigration, the victims and authorities suspect that the trafficking rings had someone assisting them in the immigration office and possibly “the

UAE embassy in Dhaka.”<sup>53</sup> This makes the need for education and border identification a top priority.

21. Recently, the UAE has partnered with INTERPOL, and in March 2022, INTERPOL carried out Operation Storm Makers, a large scale operation against organized human trafficking crime groups.<sup>54</sup> Abu Dhabi contained one of the operational coordination units.<sup>55</sup> In addition, “[s]mart electronic gates, connected to INTERPOL’s databases, were activated at airports across the [UAE] to boost passport checks and help detect forged documents.”<sup>56</sup> As part of the operation, a seventeen year old Pakistani girl was rescued from UAE after being forced into prostitution for four years.<sup>57</sup> Hopefully, this partnership will continue to produce good results.

### **Freedoms of Religion, Expression, and Peaceful Assembly**

22. In 2019, there were seventy-nine countries out of 198 studied that had laws banning blasphemy.<sup>58</sup> The UAE was and is one of them, as noted above.<sup>59</sup> Blasphemy laws are “most common in the Middle East and North Africa, where 18 of the 20 countries (90%) in the region have laws criminalizing blasphemy.”<sup>60</sup> These laws are not only discriminatory, they are used to target and punish members of minority religions.

23. In February 2020, a UAE court sentenced Akhilesh Pandey to fifteen years imprisonment and imposed a fine of approximately 500,000 dirhams for allegedly committing blasphemy.<sup>61</sup> Pandey was accused by a co-worker of “hurting religious sentiments.”<sup>62</sup> Pandey’s wife Ankita believes that his accuser and alleged witnesses “conspired and filed a complaint” because of Pandey’s “objecting to the wrongdoings of some of his subordinates.”<sup>63</sup>

24. In May 2019, three Sri Lankan workers were convicted, fined, and deported for blasphemous social media posts.<sup>64</sup> They were arrested and tried under the country’s anti-discrimination and hatred law for posting anti-religious comments on Facebook and Instagram.<sup>65</sup> The workers “were each fined 500,000 dirhams.”<sup>66</sup>

25. Further, the UAE has set two separate standards for how Christians are treated in the country.<sup>67</sup> Non-citizen Christians “are free to worship privately, but the government does not allow them to evangelize or pray in public.”<sup>68</sup> In contrast, Christian converts who are citizens “risk losing inheritance and parental rights, being forced to marry, being fired or placed under pressure to work for ‘free.’”<sup>69</sup> The UAE’s “government will act against any Christians attempting to speak openly about their faith, because evangelism is illegal and punishable under the law.”<sup>70</sup> As a result of these types of laws, there have been reports of converts who had to flee for their lives or were forced into marriage.<sup>71</sup>

26. Despite these issues, the UAE appears to be making efforts to increase religious co-existence in the country.<sup>72</sup> In October 2021, the Foreign Ministers of Israel, the UAE, and the US met to announce “the establishment of a joint working group for the promotion of coexistence and religious tolerance in the Middle East and beyond.”<sup>73</sup> At this meeting, officials “presented a blueprint for increasing interfaith tolerance, promoting freedom of worship, and fostering innovation for coexistence and cooperation between the countries on the basis of the Abraham Accords.”<sup>74</sup>

27. In 2019, the UAE President, His Highness Sheikh Khalifa bin Zayed Al Nahyan declared 2019 to be “The Year of Tolerance.”<sup>75</sup> As part of “The Year of Tolerance,” a framework was created that included “7 primary pillars that aim to cement the values of

tolerance and openness to cultures and peoples as a general community approach involving all segments of society and to establish a sustainable framework across the country.”<sup>76</sup>

28. Pope Francis’ visit in 2019 helped highlight the changes occurring in the UAE, including announcing the construction of a “multifaith complex that includes the United Arab Emirates’ first official synagogue.”<sup>77</sup> This synagogue will be part of the Abrahamic Family House in Abu Dhabi that will also contain a church and a mosque.<sup>78</sup> According to the committee overseeing the construction of this complex, “[a] church, mosque and synagogue will share a collective space for the first time, serving as a community for inter-religious dialogue and exchange, and nurturing the values of peaceful coexistence and acceptance among different beliefs, nationalities and cultures.”<sup>79</sup>

29. While this is a welcome gesture, it appears to be an outward expression of tolerance without addressing the heart of the issue. For example, the government proposed the construction of another synagogue near Dubai.<sup>80</sup> However, this synagogue was planned to be in the outskirts of the city far away from the Jewish population.<sup>81</sup> This makes it almost impossible for Jews to access because “[f]rom sundown on Friday until the sun sets on Saturday, many devout Jews refrain from the use of mechanical devices, including cars.”<sup>82</sup>

30. Further, the number of churches that have been approved in the UAE is inadequate to meet current demand of worshippers as churches are experiencing overcrowding.<sup>83</sup> As a result of a lack of churches, churches must “accommodate multiple congregations of various nationalities and languages.”<sup>84</sup> Currently, there are more than 700 Christian congregations and only 45 sanctioned church buildings in the UAE.<sup>85</sup> To help address this issue, the UAE announced plans to build 19 non-Muslim places of worship.<sup>86</sup>

31. While the UAE has made some gestures to show their tolerance and acceptance of all religions. Its actions indicate that it just wants to demonstrate that the country is open to all religions without taking tangible steps to address the actual needs of religious minorities. This can be best seen through restrictions on places of worship and blasphemy and anti-proselytization laws. The government proclaims that it is tolerant because it allows other churches to be built in the country, but, as we have demonstrated, this does little to meet the needs of religious minorities or provide for the true exercise of religion. If the UAE truly wants to be seen as a bastion of religious freedom in the Middle East, it must create a pathway for religious minorities to open their own churches and openly practice the tenets of their faith.

## **Recommendations**

32. The UAE seems to have recognized issues with sex trafficking in the country. While the National Committee to Combat Human Trafficking has taken steps to tackle this problem, the UAE must continue to strengthen this initiative even further to ensure all are protected from human trafficking and to provide adequate amounts of resources to address the problem. Most importantly, the UAE needs to focus its attention on targeting and arresting the traffickers and not the victims. Additionally, the UAE must take steps to uncover and prosecute any perpetrators within government agencies who are complicit in human trafficking. The UAE should also work with other countries to identify and eliminate trafficking coming across its borders.

33. The UAE has taken the right step forward by allowing the construction of more churches. However, it should go further to allow for religious minorities to build their own churches to suit their needs. Further, the UAE should take the next step and should repeal its

blasphemy laws and anti-proselytization laws. The UAE must provide religious freedom for everyone.

34. The UAE should also ratify the ICCPR and begin implementing the principles enshrined within.

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<sup>1</sup> *United Arab Emirates*, THE WORLD FACTBOOK (Sep. 22, 2022), <https://www.cia.gov/the-world-factbook/countries/united-arab-emirates/>.

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

<sup>3</sup> *Universal Periodic Review – United Arab Emirates*, OHCHR, <https://www.ohchr.org/en/hr-bodies/upr/ae-index> (last visited Aug. 18, 2022).

<sup>4</sup> *United Arab Emirates*, OHCHR, [https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session29/AE/UAE\\_Infographic\\_29th.pdf](https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session29/AE/UAE_Infographic_29th.pdf).

<sup>5</sup> *UPR of United Arab Emirates (3rd Cycle – 29th session): Thematic List of Recommendations*, OHCHR, at A/HRC/38/14/Add. 1, <https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session29/AE/MatriceRecommendationsUAE.docx>.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> UNITED ARAB EMIRATES’S CONST. OF 1971, art. 34, [https://www.constituteproject.org/constitution/United\\_Arab\\_Emirates\\_2009?lang=en](https://www.constituteproject.org/constitution/United_Arab_Emirates_2009?lang=en).

<sup>12</sup> Federal Law No. (51) of 2006 on Combating Human Trafficking Crimes (amended 2015, Federal Law No. (1)) art. 1 (U.A.E.), <https://www.ilo.org/dyn/natlex/docs/ELECTRONIC/101815/122872/F1775414648/40.pdf>.

<sup>13</sup> *Id.* at art. 2.

<sup>14</sup> *Id.*

<sup>15</sup> *Id.* at art. 1.

<sup>16</sup> *Id.* at art. 9.

<sup>17</sup> *Status of Ratification – United Arab Emirates*, OHCHR, <https://indicators.ohchr.org/> (last visited Aug. 22, 2022).

<sup>18</sup> Convention on the Rights of the Child art. 34, Nov. 20, 1989, 1577 U.N.T.S. 3, <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>.

<sup>19</sup> *Id.* at art. 36.

<sup>20</sup> A Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, Nov. 15, 2000, 2237 U.N.T.S. 319, [https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg\\_no=XVIII-12-a&chapter=18&clang=\\_en](https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XVIII-12-a&chapter=18&clang=_en).

<sup>21</sup> *Id.* at art. 9.

<sup>22</sup> UNITED ARAB EMIRATES’S CONST. OF 1971 art.7, *supra* note 11.

<sup>23</sup> *Id.* at art. 25

<sup>24</sup> *Id.* at art. 32.

<sup>25</sup> *Id.* at art. 33

<sup>26</sup> *Id.* at art. 7.

<sup>27</sup> Federal Law No. (3) of 1987 art. 319 (U.A.E.), <https://cdn.expatwoman.com/s3fs-public/UAE%20Penal%20Code.pdf>.

<sup>28</sup> *Id.* at art. 320.

<sup>29</sup> *Id.*

<sup>30</sup> Tamer El-Ghobashy, *Five Things to Know about Religious Freedom in the United Arab Emirates*, THE WASHINGTON POST (Feb. 5, 2019), <https://www.washingtonpost.com/world/2019/02/05/five-things-know-about-religious-freedom-united-arab-emirates/>.

<sup>31</sup> *Id.*

<sup>32</sup> *Id.*

<sup>33</sup> Federal Decree Law No. 2 of 2015 On Combatting Discrimination and Hatred art. 1, July 15, 2015, <https://u.ae/-/media/Documents-2022/Federal-Law-No-2-On-Combating-Discrimination-and-Hatredpdf-Engaspx.ashx>.

<sup>34</sup> *Id.* at art. 6.

<sup>35</sup> *Id.* at art. 1.

<sup>36</sup> *Id.* at art. 4.

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<sup>37</sup> *Id.* at art. 5.

<sup>38</sup> Federal Law No. (3) of 1987 art. 312 (U.A.E.), *supra* note 27.

<sup>39</sup> *Id.*

<sup>40</sup> *United Arab Emirates, EX-MUSLIMS OF NORTH AMERICA* (last visited Sep. 21, 2022), <https://persecution.exmuslims.org/countries/ united-arab-emirates/>.

<sup>41</sup> *Status of Ratification – United Arab Emirates*, *supra* note 17.

<sup>42</sup> Anna Ryu, *Human Trafficking in the United Arab Emirates*, THE BORGES PROJECT (Oct. 21, 2021), <https://borgenproject.org/human-trafficking-in-the-united-arab-emirates/>.

<sup>43</sup> Amalia Rosenblum, *Visiting Dubai is Like Standing on the Sidelines of a Gang Rape*, HAARETZ (Nov. 30, 2020), <https://www.haaretz.com/middle-east-news/2020-11-30/ty-article-opinion/.premium/visiting-dubai-is-like-standing-on-the-sidelines-during-a-gang-rape/0000017f-f528-d47e-a37f-fd3c85040000>.

<sup>44</sup> Tara Abhasakun, *Labour Minister Warns Thai Women of Trafficking in UAE “Jobs,”* THE THAIGER (July 20, 2022), <https://thethaiger.com/hot-news/crime/labour-minister-warns-thai-women-of-trafficking-in-uae-jobs>.

<sup>45</sup> Ryu, *supra* note 42.

<sup>46</sup> *Id.*

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

<sup>48</sup> Jonathan Fenton-Harvey, *How the UAE’s Workers Sponsorship System Facilitates Human Trafficking*, INSIDE ARABIA (Jan. 2, 2020), <https://insidearabia.com/how-the-uaes-workers-sponsorship-system-facilitates-human-trafficking/>.

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

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

<sup>51</sup> *Id.*

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

<sup>53</sup> Hasan Al Javad, *Dubai Sex Trafficking Victims Relate Tales of Duplicity and Horror*, DHAKA TRIBUNE (Sep. 12, 2020), [https://archive.dhakatribune.com/bangladesh/2020/09/12/dubai-sex-victims-relate-tales-of-duplicity-and-horror?fbclid=IwAR0wN5xyRKxBD1whgp5SvywZCZwwAe\\_IsU7CgPQg99k6fgsc32x14oyPK18](https://archive.dhakatribune.com/bangladesh/2020/09/12/dubai-sex-victims-relate-tales-of-duplicity-and-horror?fbclid=IwAR0wN5xyRKxBD1whgp5SvywZCZwwAe_IsU7CgPQg99k6fgsc32x14oyPK18).

<sup>54</sup> *121 Arrests in Operation against Migrant Smuggling and Human Trafficking*, HOMELAND SECURITY TODAY (May 10, 2022), <https://www.hstoday.us/subject-matter-areas/border-security/121-arrests-in-operation-against-migrant-smuggling-and-human-trafficking/>.

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

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

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

<sup>58</sup> Virginia Villa, *Four-in-Ten Countries and Territories Worldwide had Blasphemy Laws in 2019*, PEW RESEARCH CENTER (Jan. 25, 2022), <https://www.pewresearch.org/fact-tank/2022/01/25/four-in-ten-countries-and-territories-worldwide-had-blasphemy-laws-in-2019-2/>.

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

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

<sup>61</sup> P. Naveen, *Husband in UAE Prison for Blasphemy, Ujjain Woman Pleads to PM Narendra Modi for Help*, TIMES OF INDIA (Nov. 12, 2020), <https://timesofindia.indiatimes.com/city/bhopal/husband-in-uae-prison-for-blasphemy-ujjain-woman-pleads-to-pm-narendra-modi-for-help/articleshow/79182349.cms>.

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

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

<sup>64</sup> Mariam Nabbout, *Three Men Fined \$400,000 in the UAE for Insulting Islam Online*, STEP FEED (Jan. 21, 2020), <https://stepfeed.com/three-men-fined-usd400-000-in-the-uae-for-insulting-islam-online-1768>.

<sup>65</sup> *Id.*

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

<sup>67</sup> *United Arab Emirates*, OPEN DOORS USA, <https://www.opendoorsusa.org/christian-persecution/world-watch-list/united-arab-emirates/> (last visited Aug. 25, 2022).

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

<sup>69</sup> *Id.*

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

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

<sup>72</sup> *United Arab Emirates: Promise of Church Construction*, OPEN DOORS (Aug. 18, 2019), <https://www.opendoors.org/en-US/news/stories/united-arab-emirates-promise-of-church-construction/>.

<sup>73</sup> *Israel, the UAE and the US Promote Religious Tolerance and Coexistence*, THE GOVERNMENT OF ISRAEL (Jul. 19, 2022), <https://www.gov.il/en/departments/news/israel-the-uae-and-the-us-promote-religious-tolerance-and-coexistence-19-jul-2022>.

<sup>74</sup> *Id.*

<sup>75</sup> *Our Participation in Government Initiatives*, THE UNITED ARAB EMIRATES MINISTRY OF ECONOMY, (last visited Sep. 20, 2022), <https://www.moec.gov.ae/en/-/en/year-of-tolerance-1>.

<sup>76</sup> *Id.*

<sup>77</sup> Chase Winter, *UAE's First Official Synagogue to be Complete by 2022*, DW (Sep. 22, 2019), <https://www.dw.com/en/uaes-first-official-synagogue-to-be-complete-by-2022/a-50537493>.

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

<sup>79</sup> *Id.*

<sup>80</sup> Isabel Debre, *Jews Struggle to Find Places of Worship in Dubai*, ARKANSAS DEMOCRAT GAZETTE, (May 21, 2022), <https://www.arkansasonline.com/news/2022/may/21/jews-struggle-to-find-places-of-worship-in-dubai/>.

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

<sup>82</sup> *Id.*

<sup>83</sup> *United Arab Emirates*, MIDDLE EAST CONCERN (last visited Sep. 21, 2022), <https://meconcern.org/countries/united-arab-emirates/>.

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

<sup>85</sup> El- Ghobashy, *supra* note 30.

<sup>86</sup> Augustine Passilly, *New Churches to be Built in the United Arab Emirates*, LA CROIX INTERNATIONAL (Jul. 3, 2019), <https://international.la-croix.com/news/religion/new-churches-to-be-built-in-the-united-arab-emirates/10457>.