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AHMADIYYA  
MUSLIM COMMUNITY  
*United States of America*

***The Ahmadiyya Muslim Lawyers Association USA (“AMLA USA”) is an ancillary organization of the Ahmadiyya Muslim Community USA. It is composed of Ahmadi Muslim lawyers in the United States of America.***

## EXECUTIVE SUMMARY

*Pakistan's treatment of Ahmadi Muslims is in flagrant violation of its obligations under international law, most notably the International Covenant on Civil and Political Rights (ICCPR). Pakistan's Constitution declares Ahmadi Muslims to be non-Muslim, thereby depriving them of the freedom to adopt a religion of their choice, in violation of Article 18 of the ICCPR. Pakistan's Penal Code contains anti-Ahmadi and anti-blasphemy provisions that prohibit Ahmadi Muslims from manifesting any aspect of their faith as Muslims, also in violation of Article 18. Pakistan disenfranchises Ahmadi Muslims by placing them on an electoral roll separate from all other citizens, who are entitled to vote in a joint electorate, in violation of Article 25(b) of the ICCPR. Pakistan requires every passport applicant and national identity card applicant to make a declaration of faith, and requires any citizen who wishes to be known as Muslim thereon, to make a declaration denouncing Ahmadi Muslims as non-Muslim, in violation of Articles 12 and 20 of the ICCPR. Finally, Pakistan has failed to protect the life and liberty of Ahmadi Muslims, and governmental authorities (particularly at the provincial and local level) are complicit in advocating religious hatred against Ahmadi Muslims, in violation of Articles 6, 18, and 20 of the ICCPR. State-sponsored advocacy of hatred results in discrimination, as well as acts of violence, the most notable example of which was the massacre of 86 Ahmadi Muslims in Lahore on May 28, 2010. More recently, in an alarming development, state authorities are arresting and prosecuting Ahmadi Muslims as "terrorists" under the provisions of Pakistan's primary anti-terrorism legislation, the Anti-Terrorism Act of 1997, for possessing allegedly banned religious publications.*

### **I. INTRODUCTION**

1. The Ahmadiyya Muslim Community ("AMC") firmly adheres to Islam. Ahmadi Muslims believe that the founder of their Community, Hadhrat Mirza Ghulam Ahmad of Qadian, India, was a subordinate non-law bearing prophet who claimed to be the same messiah and reformer foretold by Prophet Muhammad and awaited by all Muslims. An estimated 3-4 million Ahmadi Muslims currently live in Pakistan.<sup>i</sup>
2. The state-sponsored persecution that Ahmadi Muslims face in Pakistan stems from the assertion by some Muslim sects that Ahmadis are not Muslim. Ahmadis firmly believe that they are Muslim and fall within the pale of Islam. They believe in the five pillars of Islam universally accepted by all Muslims and believe that the Prophet Muhammad is the last law bearing and greatest prophet.
3. On June 23, 2010, Pakistan took a positive step to ratify the ICCPR.<sup>ii</sup> Since April 17 2008, Pakistan has been a party to the ICESCR and the UNCAT.
4. When Pakistan ratified the ICCPR, it originally expressed several formal reservations, including the following: "The Islamic Republic of Pakistan declares that the provisions of Articles 3, 6, 7, 18 and 19 shall be so applied to the extent that they are not repugnant to the Provisions of the Constitution of Pakistan and the Sharia laws."<sup>iii</sup> In response to urgings from the European Union, however, Pakistan *withdrew* its reservations to Articles 6, 7, 8, 18, and 19 in June 2011.<sup>iv</sup> As a result, those ICCPR articles now apply with full force to Pakistan.
5. Very little progress, however, has been made to respect, protect and fulfill the rights of Ahmadi Muslims in Pakistan. As a result of institutionalized persecution and targeted violence perpetrated by extremist non-state actors who act with impunity, Pakistan has failed in its duty to live up to its international human rights obligations.<sup>v</sup>

### **II. ISSUES OF CONCERN SINCE PREVIOUS UPR REVIEW**

- A. **Legal Restrictions on Freedom of Religion of Ahmadi Muslims Are Still in Place (ICCPR Art. 18)**

6. According to recommendations made in the Working Group Report on the UPR in December 2012, Member States had called on Pakistan to lift legal restrictions on freedom of religion. The USA expressed serious concerns about “the violence against Shia, Christian and Ahmadi communities.”<sup>vi</sup> Canada recommended “removing restrictions on freedom of religion which discriminate against persons belonging to minorities, and to permit the Ahmadis’ imprisonment for preaching their beliefs”<sup>vii</sup> and called for the adoption of “measures to ensure the protection of religious minorities, including Ahmadis, Christians, Hindus and Sikhs, prevent the abuse of blasphemy legislation. . . and take necessary steps to prevent violence against members of religious minority communities.”<sup>viii</sup> Moreover, France recommended that Pakistan “[r]epeal the blasphemy law and respect and guarantee freedoms of religion or belief and of expression and opinion for all, including Ahmadis, Hindus and Christians.”<sup>ix</sup>
7. Since the last UPR, Pakistan has yet to repeal targeted legal restrictions on the ability of AMC to practice their beliefs freely. It has failed to amend or repeal Article 260(3) and the Second Amendment to Pakistan’s Constitution, which taken together, legally declare Ahmadis to be “non-Muslims.”<sup>x</sup>
8. Nor has Pakistan abolished anti-Ahmadi provisions within Pakistan’s Penal Code (“PPC”). In 1984, General Zia promulgated Ordinance XX, which amended and added Sections 298-B and 298-C to Pakistan’s PPC.<sup>xi</sup> Ordinance XX prohibits Ahmadis from “indulging in anti-Islamic activities.” They are barred from using any honorific titles or epithets specific to Islam, building Mosques, displaying the *Kalima* (the creed of Islam), or reciting the *Azan* (call to Muslim prayer). Ahmadis also cannot “pose” as Muslims, call or refer to their faith as Islam, or to preach or propagate their faith. Any act by an Ahmadi which is perceived by any person in Pakistan as being associated with Islam is deemed a criminal and arrestable offense punishable with up to 3 years imprisonment.
9. These constitutional and legal provisions clearly violate Article 18. Article 260(3) and Ordinance XX deny Ahmadis the freedom to have or adopt a religion of their choice, Islam, both individually and in community with others. Ordinance XX further criminalizes any manifestation of Islamic faith by an Ahmadi. General Comment No. 22, which constitutes an authoritative interpretation of Article 18, clearly states that “[t]he freedom to manifest religion or belief in worship, observance, practice and teaching encompasses a broad range of acts . . . including the building of places of worship, the use of ritual formulae and objects, the display of symbols . . . [and] the freedom to establish seminaries or religious schools and the freedom to prepare and distribute religious texts or publications.”<sup>xii</sup> Ordinance XX denies Ahmadis each of these rights. For instance, between 1984 and 2015, Pakistani authorities sealed 33 mosques and forbid the construction of 54 mosques, while 27 mosques were demolished, 21 mosques were torched or damaged, and 17 mosques were forcibly occupied.<sup>xiii</sup> They also denied the cemetery burial of 65 Ahmadis and have exhumed the bodies of 39 Ahmadis.<sup>xiv</sup>
10. Any justification of these provisions under Article 18(3) or Article 19(3) is without any legal or factual basis. The ICCPR’s “public order (*ordre public*)” and “morals” exception in Articles 18 and 19 cannot justify domestic laws of acceding nations that (1) restrict the freedoms of religion and expression based “exclusively” on “morals” specific to one “single tradition” (e.g., Islam); (2) evidence a “discriminatory purpose” or are “applied in a discriminatory manner”; and (3) “discriminate . . . against . . . one religious or belief system.” Significantly, General Comment No. 34 identifies “blasphemy laws” as being “incompatible with the Covenant.”
11. Apart from Article 260(3) and Ordinance XX, Ahmadis are also targeted by the broad anti-blasphemy provisions in Pakistan’s PPC.<sup>xv</sup> Between 1984 and 2016, there were nearly 1500 blasphemy and other religious-based cases against Ahmadis.<sup>xvi</sup>
12. On December 25, 2014, in response to the horrific Peshawar School attack, the Government of Pakistan established a National Action Plan (NAP) to address terrorism and extremism in the country. According to the NAP: “Strict action against the literature, newspapers and magazines promoting hatred, decapitation, extremism, sectarianism and intolerance” will be taken; “End to religious extremism and protection of minorities will be ensured.”; Ironically, however, counter-terrorism authorities have used the specter of NAP to arrest and prosecute vulnerable Ahmadis as “terrorists” under the Anti-Terrorism Act of 1997 (section 8 prohibits acts intended or likely to stir

up sectarian hatred, and section 11W prohibits the printing, publishing, or disseminating of any “material to incite hatred.”<sup>xvii</sup> Most recently, on December 5, 2016, Punjab counter-terrorism police raided the international headquarters of AMC in Rabwah and arrested several Ahmadis for possessing literature that was allegedly “banned” under Section 99-A of the Criminal Code. Notably, none of the Ahmadi literature contains any material promoting hatred whatsoever, and the charging documents do not reference a single page or line from the literature.

**B. Effectively Disenfranchised: Separate Electoral List for Ahmadi Muslims (ICCPR Art. 25)**

13. Ahmadis are denied the right to freely and fairly vote in local, provincial and national elections.
14. Prior to 1978—when President Zia-ul-Haq declared his intent to abolish the joint-electorate system—all Pakistani citizens had an equal vote irrespective of faith.
15. In 1985, General Zia split the electorate so non-Muslims would have to register on separate “non-Muslim” electoral rolls.<sup>xviii</sup> Non-Muslim minorities could only vote for non-Muslim candidates, comprising only 5 percent of the National Assembly seats. To vote, Ahmadi Muslims were forced to register on “non-Muslim” electoral rolls, something that their conscience would not permit.
16. On February 27, 2002, President Musharraf issued an executive order—EO No. 7—that abolished Pakistan’s separate electorate system, restoring the joint-electorate that existed before General Zia.<sup>xix</sup>
17. However, shortly thereafter, relenting to extremist pressure, President Musharraf issued a new Executive Order No. 15, amending EO No. 7 and providing that while “elections for the members of the National Assembly and the Provincial Assemblies shall be held on the basis of joint electorate”, the “*Status of Ahmadis [was] to remain unchanged.*”<sup>xx</sup>
18. Under EO No. 15, all citizens, except Ahmadis, were moved to the main electoral list leaving only Ahmadis on the non-Muslim list.<sup>xxi</sup> Currently, the list serves no practical purpose as all citizens, irrespective of faith, vote for the same general seats in the National and Provincial Assemblies. Therefore, this list is nothing more than a symbolic reaffirmation of the non-Muslim status given to Ahmadis.
19. However, for Ahmadis living in Pakistan, such a list—with contact information of registered Ahmadi voters—has very real and dangerous consequences, as it could be used by extremists to target them.
20. Therefore, while all other Pakistanis vote under a joint electoral list, Ahmadis are the *only* section of the populace that are effectively deprived of the right to vote, in clear violation of Article 25 of the ICCPR.
21. Furthermore, the voter registration forms are blatantly discriminatory toward Ahmadis. All new voters must complete Form A, which requires a faith declaration. “Muslim” and “Qadiani/Ahmadi” are distinct options, clearly implying that Ahmadis are non-Muslim. Moreover, even if Ahmadis were to check the box as “Muslim,” they must affirm under oath that they denounce the founder of AMC. Due to this systematic discrimination, Ahmadis did not vote in the last federal, provincial or local elections, and unless serious reform is made, Ahmadis cannot vote in the 2018 general elections either.

**C. Passport and National Identity Card Declaration (ICCPR Articles 12 and 20)**

22. Pakistan requires every citizen applying for a passport to declare his/her faith. If a person wishes to declare himself or herself Muslim, he/she must sign a declaration titled “Declaration in the Case of Muslims.”<sup>xxii</sup> That declaration provides, in relevant part, that “*I consider Mirza Ghulam Ahmad Qadiani to be an imposter nabi and also consider his followers . . . to be Non-Muslim.*”<sup>xxiii</sup> Pakistanis who wish to obtain a National Identity Card are required to make a similar declaration.<sup>xxiv</sup> The passport declaration prevents Ahmadi Muslims from performing Hajj, a basic pillar of their faith. This declaration forces Ahmadis to renounce their identity as Muslims in order to obtain basic

travel documents. Equally troubling, the declaration advocates religious hatred that constitutes incitement to discrimination and hostility against Ahmadis.

23. The Passport and National Identity Card declarations are in clear violation of the right to liberty of movement, guaranteed in Article 12. They also effectively advocate religious hatred in violation of Article 20.

#### **D. Systematic Persecution of Ahmadi Muslims (ICCPR Articles 6, 18(2) and 20(2))**

24. Pakistan has failed to protect the life, liberty and security of Ahmadis. They continue to be victims of violence and persecution. According to AMC, from 1984 to 2015, 256 Ahmadis have been killed and 377 have been assaulted for their faith.<sup>xxv</sup>
25. On May 28, 2010, 86 Ahmadis were killed and more than 120 were injured in nearly simultaneous attacks against two Ahmadi Muslim Mosques, perpetrated by the Tehrek-i-Taliban Pakistan (TTP). This was the single worst act of violence against the Community to date.<sup>xxvi</sup>
26. In 2012, in Karachi, Ahmadis were subject to an orchestrated campaign of targeted attacks that claimed at least 10 Ahmadi lives, including a local President.<sup>xxvii</sup>
27. On May 26, 2014, an American Ahmadi doctor, Mehdi Ali Qamar, who was volunteering at a local heart clinic in Rabwah, was shot and killed when visiting family gravesites.
28. On July 27, 2014, a violent mob attacked, ransacked, and looted homes and shops of Ahmadis in Gujranwala, resulting in the death of an elderly woman and two children. The attack took place in the presence of police who took no effective action to stop the mob,<sup>xxviii</sup> and occurred after a false allegation was made against a young Ahmadi for posting a blasphemous picture on Facebook.<sup>xxix</sup>
29. In November 2015, a mob set ablaze an Ahmadi-owned chipboard factory, in Jhelum, Punjab. Ahmadi employees were falsely accused of desecrating the Quran. Three Ahmadis were arrested and charged at the time of the incident. Though arrests have been made, no perpetrator has been convicted.<sup>xxx</sup>
30. In December 2016, an Ahmadi died of cardiac arrest as a result of an attack on an Ahmadi Mosque near Chakwal, which also displaced some Ahmadi families. The attack took place after locals filed a petition with police claiming ““infidels” were illegally occupying the building and threatened “to take extreme measures to liberate this mosque. ””<sup>xxxi</sup> Two Ahmadis were also arrested after the attack despite being innocent victims of the mob attack. Though 61 persons have been charged in the attack, no one has yet been convicted.<sup>xxxii</sup>
31. As noted earlier, in an alarming development, Ahmadis in the last few years have been arrested and prosecuted under provisions of Pakistan’s primary Anti-terrorism legislation, the Anti-terrorism Act, 1997. On December 2, 2015, the Counter Terrorism Department (CTD) raided the bookstore of an 80-year old optician Abdul Shakoor who was arrested and sentenced to five years in prison on blasphemy and terrorism charges for selling copies of the Qur’an and other publications of the community.<sup>xxxiii</sup>
32. Similarly, Tahir Mehdi, the editor of AMC's daily newspaper Al-Fazl, a 102-year old publication, was arrested and sentenced to blasphemy and terrorism charges for publishing and circulating a banned newspaper.<sup>xxxiv</sup>
33. On December 5, 2016, the CTD conducted a warrantless raid of one of the central offices of the AMC in Rabwah where they confiscated laptops, mobile phones and books, disabled CCTV cameras, and arrested three Ahmadi workers (including two imams) and seriously injured others.<sup>xxxv</sup>

#### **F. Police Torture of Ahmadi Muslims (UNCAT)**

34. On February 10, 2012, police authorities in Rabwah took Master Abdul Qudoos Ahmad, an Ahmadi schoolteacher, into custody in connection with a murder investigation for which he was kept in

illegal detention by the police for 35 days where he was severely tortured. He died shortly after his release succumbing to his wounds.<sup>xxxvi</sup> Since 2012, there is no evidence that an investigation into the death was conducted and anyone was held responsible.

35. On December 5, 2016, during the raid of AMC offices, police arrested and beat several Ahmadis, including a foreman and some Ahmadi imams.<sup>xxxvii</sup> Those who were arrested were severely tortured by local police.<sup>xxxviii</sup>
36. The conduct of police authorities to date is in clear violation of Pakistan's obligations under the UNCAT. *See* Articles 2(1), 12, 13.

### **III. RECOMMENDATIONS TO PAKISTAN GOVERNMENT**

1. Repeal Chief Executive's Order No. 15 and permit Ahmadis to vote alongside all other Pakistanis as part of a joint electorate.
2. Protect and promote the rights of Ahmadis.
3. Remove restrictions on freedom of religion or belief and amend legislation that discriminates against Ahmadis.
4. Cease prosecuting Ahmadis as "terrorists" under anti-terrorism laws.
5. Remove Passport and National Identity Declarations pertaining to Ahmadis.
6. Combat impunity for attacks on Ahmadis by effectively investigating allegations and by prosecuting those responsible.

### **IV. CONCLUSION**

Pakistan is in fundamental breach of its obligations under international law, in particular the ICCPR. There is no justification for the continued regime of religio-political apartheid against Ahmadi Muslims.

**ENDNOTES**

<sup>i</sup> See M. Nadeem Ahmad Siddiq, “Enforced Apostasy: Zaheerudin v. State and the Official Persecution of the Ahmadiyya Community in Pakistan,” JOURNAL OF LAW AND INEQUALITY, Vol. 14, 1995, at pp. 275, 279.

<sup>ii</sup> UN TREATY COLLECTION STATUS OF TREATIES, International Covenant on Civil and Political Rights, [http://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg\\_no=IV-4&chapter=4&lang=en#EndDec](http://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-4&chapter=4&lang=en#EndDec).

<sup>iii</sup> *Id.*

<sup>iv</sup> *Pakistan Decides to Withdraw Most of Reservations on ICCPR, UNCAT, THE NATION* (June 23, 2011), available at <http://www.nation.com.pk/pakistan-news-newspaper-daily-english-online/national/23-Jun-2011/Pakistan-decides-to-withdraw-most-of-reservations-on-ICCPR-UNCAT>.

<sup>v</sup> See generally Qasim Rashid, “Pakistan’s Failed Commitment: How Pakistan’s Institutionalized Persecution of the Ahmadiyya Muslim Community Violates The International Covenant on Civil and Political Rights,” RICHMOND JOURNAL OF GLOBAL LAW AND BUSINESS, Vol. 11, No. 1, Winter 2011, available at [http://rjglb.richmond.edu/archives/11.1/rgl\\_11-1.pdf](http://rjglb.richmond.edu/archives/11.1/rgl_11-1.pdf).

<sup>vi</sup> U.N. HRC, 22<sup>nd</sup> Sess., U.N. Doc. A/HRC/22/12, ¶ 39, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G12/190/31/PDF/G1219031.pdf?OpenElement>.

<sup>vii</sup> *Id.* at ¶ 59.

<sup>viii</sup> *Id.* ¶ 122.156.

<sup>ix</sup> *Id.* at ¶ 122.32.

<sup>x</sup> PAK. CONST. art. 260, § 3, available at <http://www.mofa.gov.pk/Publications/constitution.pdf>

<sup>xi</sup> PAK PENAL CODE, §§ 298B, 298C (made part of Penal Code by Presidential Ordinance No. 20 (1984), THE GAZETTE OF PAKISTAN EXTRAORDINARY, Apr. 26, 1984), available at <http://www.pakistani.org/pakistan/legislation/1860/actXLVof1860.html>. The Supreme Court of Pakistan has upheld Ordinance XX against a legal challenge. *Zaheerudin v. State*, 26 S.C.M.R. 1718 (S.Ct. 1993) (Pak.). *Zaheerudin v. State* was a 4-1 ruling led by Justice Abdul Qadeer Chaudhry, holding that Ordinance XX was in accord with statutes and judicial opinions in England and the United States that protect religious freedom; the majority erroneously cited legal precedent from both jurisdictions as false support. See also Amjad Mahmood Khan, “Misuse and Abuse of Legal Argument by Analogy in Transjudicial Communication: The Case of *Zaheerudin v. State*,” RICHMOND JOURNAL OF GLOBAL LAW AND BUSINESS, Vol. 10, No. 4, Fall 2011, available at [http://rjglb.richmond.edu/archives/10.4/rgl\\_10-4.pdf](http://rjglb.richmond.edu/archives/10.4/rgl_10-4.pdf).

<sup>xii</sup> Human Rights Committee, 48<sup>th</sup> session, General Comment 22 Article 18 (1993), U.N. Doc. CCPR/C/21/Rev.1/Add.4 (1993), reprinted in *Compilation of General Comments and General Recommendations Adopted by Human Rights Treaty Bodies*, U.N. Doc. HRI/GEN/1/Rev.6 at 155 (2003), available at

[http://www.unhcr.ch/tbs/doc.nsf/\(Symbol\)/9a30112c27d1167cc12563ed004d8f15?Opendocument](http://www.unhcr.ch/tbs/doc.nsf/(Symbol)/9a30112c27d1167cc12563ed004d8f15?Opendocument).

<sup>xiii</sup> Ahmadiyya Muslim Community, *A Report on the Persecution of Ahmadis in Pakistan during the Year 2016*, 129 (2017), available at <https://www.persecutionofahmadis.org/wp-content/uploads/2017/02/Persecution-of-Ahmadis-in-Pakistan-2016.pdf>.

<sup>xiv</sup> *Id.*

<sup>xv</sup> Blasphemy in Pakistan broadly refers to any spoken or written representation that “directly or indirectly” outrages the religious sentiments of Muslims. See Amjad Mahmood Khan, “Persecution of the Ahmadiyya Community in Pakistan: An Analysis Under International Law and International Relations,” HARVARD HUMAN RIGHTS LAW JOURNAL, Vol. 16, Spring 2003, at p. 227, available at <http://www.law.harvard.edu/students/orgs/hrj/iss16/khan.shtml#fnB40>.

<sup>xvi</sup> *A Report on the Persecution of Ahmadis in Pakistan during the Year 2016*, *supra* note xiii at 129.; See also JINNAH INSTITUTE, STATE OF RELIGIOUS FREEDOM IN PAKISTAN 26 (2015), <http://jinnah-institute.org/wp-content/uploads/2016/01/Minority-Report-2016.pdf>.; See also UNITED STATES DEPARTMENT OF STATE, *International Religious Freedom Report for 2014 - Pakistan*, (Oct. 14 2015), available at <https://www.state.gov/j/drl/rls/irf/2014religiousfreedom/index.htm#wrapper>; UNITED STATES COMMISSION ON INTERNATIONAL RELIGIOUS FREEDOM (USCIRF), *2016 Annual Report*:



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UNITED STATES DEPARTMENT OF STATE, *International Religious Freedom Report for 2015 - Pakistan*, (Aug. 10, 2016), available at <https://www.state.gov/j/drl/rls/irf/religiousfreedom/index.htm#wrapper>

<sup>xvii</sup> Anti-terrorism Act, No. 27 of 1997, §8, GOVERNMENT OF PUNJAB WEBSITE, <http://www.punjabcode.punjab.gov.pk/public/dr/THE%20ANTI-TERRORISM%20ACT,%201997.doc.pdf>.

<sup>xviii</sup> PRESIDENT'S ORDER 14 of 1985 REVIVAL OF THE CONSTITUTION OF 1973 ORDER, 1985 [Gazette of Pakistan, Extraordinary, Part-1, 2nd March 1985] No. F 17(3)/85-Pub., available at [http://www.pakistani.org/pakistan/constitution/orders/po14\\_1985.html](http://www.pakistani.org/pakistan/constitution/orders/po14_1985.html).

<sup>xix</sup> Conduct of General Elections Order No. 7 of 2002, available at <http://www.ecp.gov.pk/ElectionLaws/GeneralElectionsOrder2002.aspx>.

<sup>xx</sup> *Id.*

<sup>xxi</sup> “Minorities Under Attack: Faith-based Discrimination and Violence in Pakistan,” Human Rights Commission of Pakistan. available at: [https://www.fidh.org/IMG/pdf/20150224\\_pakistan\\_religious\\_minorities\\_report\\_en\\_web.pdf](https://www.fidh.org/IMG/pdf/20150224_pakistan_religious_minorities_report_en_web.pdf)

<sup>xxii</sup> Application Form for Passport, available at <http://www.embassyofpakistanusa.org/forms/A%20form%20fillable.pdf>.

<sup>xxiii</sup> *Id.*

<sup>xxiv</sup> Asian Human Rights Commission, *Pakistan: More Muslim than the Muslim* (Mar. 2, 2012), available at <http://www.humanrights.asia/news/ahrc-news/AHRC-ART-017-2012>.

<sup>xxv</sup> *A Report on the Persecution of Ahmadis in Pakistan during the Year 2016*, *supra* note xii at 129.

<sup>xxvi</sup> *Id.*, at 102.

<sup>xxvii</sup> *Spate of murderous attacks in Karachi*, The Persecution of Ahmadis, <https://www.persecutionofahmadis.org/spate-of-murderous-attacks-in-karachi/>; Asian Human Rights Commission, *PAKISTAN: Investigation failure leads to the killings of Ahmadis* (May 27, 2016), <http://www.ahrchk.org/ruleoflawasia.net/news.php?id=AHRC-STM-082-2016>; *Ahmadi Man Gunned Down in Suspected Sectarian Attack in Karachi*, Dawn.com (Nov. 28, 2016), <https://www.dawn.com/news/1298985>.

<sup>xxviii</sup> *The Gujranwala Riot*, THE PERSECUTION OF AHMADIS, <https://www.persecutionofahmadis.org/the-gujranwala-riot/>.

<sup>xxix</sup> *Ahmadiyya Muslim Community, A Report on the Persecution of Ahmadis in Pakistan during the Year 2014*, 4 (2015), available at <https://www.persecutionofahmadis.org/wp-content/uploads/2010/03/Persecution-of-Ahmadis-in-Pakistan-2014.pdf>.

<sup>xxx</sup> *Jhelum Rioters Arrested*, NEWSWEEK PAKISTAN (Nov. 25 2015), <http://newsweekpakistan.com/jhelum-rioters-arrested/>.

<sup>xxxi</sup> *Canadian Government asked to Probe Whether Toronto-area Man Involved in Pakistan Mosque Siege*, NATIONAL POST (Dec.13, 2016), <http://news.nationalpost.com/news/canada/canadian-government-asked-to-investigate-whether-toronto-area-man-involved-in-siege-on-pakistan-mosque>.

<sup>xxxii</sup> Nabeel Anwar Dhakku, *Charges Framed Against 61 Accused of Dulmial Incident*, DAWN.COM, (Jan. 15, 2017), <https://www.dawn.com/news/1308457>.

<sup>xxxiii</sup> *Pakistan: USCIRF Calls for the Immediate Release of Abdul Shakoor and the Dropping of all Charges*, UNITED STATES COMMISSION ON INTERNATIONAL RELIGIOUS FREEDOM (USCIRF) (Dec. 9, 2016), <http://www.uscirt.gov/news-room/press-releases/pakistan-uscirt-condemns-egregious-treatment-ahmadis>; *PAKISTAN: USCIRF Condemns Egregious Treatment of Ahmadis*, UNITED STATES COMMISSION ON INTERNATIONAL RELIGIOUS FREEDOM (USCIRF) (Dec. 9, 2016), <http://www.uscirt.gov/news-room/press-releases/pakistan-uscirt-condemns-egregious-treatment-ahmadis>.

<sup>xxxiv</sup> Rana Tanveer, *Publisher of Ahmediyya Daily Denied Bail*, THE EXPRESS TRIBUNE (Dec. 9, 2015), <https://tribune.com.pk/story/1006483/publisher-of-ahmediyya-daily-denied-bail/>.

<sup>xxxv</sup> *Bigotry against Ahmadis, a Constant in Pakistan*, AL JAZEERA, (Dec. 18, 2016), <http://www.aljazeera.com/indepth/opinion/2016/12/bigotry-ahmadis-constant-pakistan-161218113353263.html>.

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<sup>xxxvi</sup> Asian Human Rights Commission, “PAKISTAN: In a hate campaign against the Ahmadis, police tortured to death an innocent school teacher (April 3, 2012), available at <http://www.humanrights.asia/news/urgent-appeals/AHRC-UAC-057-2012>.

<sup>xxxvii</sup> *A Report on the Persecution of Ahmadis in Pakistan during the Year 2016*, *supra* note xiii at 1.

<sup>xxxviii</sup> Ahmadiyya Foreign Missions Office, Update On The Unlawful Horrific CTD Raid on Ahmadiyya Office and Zia ul Islam Press (Dec. 9, 2015), <https://www.persecutionofahmadis.org/wp-content/uploads/2016/12/Raid-Tehreek-e-Jadeed-Flash-Report-Followup.pdf>.