



# Combatting Forced Marriage of Young Women in Pakistan

*by Arielle Del Turco*

## Key Points

Each year, hundreds of Christian and Hindu girls in Pakistan are forced to convert to Islam and marry their Muslim abductors.

Pakistan's culture of religious discrimination and the unwillingness of its leaders to protect its religious citizens enables forced conversion and marriage.

Through the use of diplomatic relations, congressional resolutions, and targeted sanctions, the U.S. must call Pakistan to a higher standard of human rights conditions.

## Summary

**N**o marriage ought to begin with violence or coercion. Yet, in Pakistan, this phenomenon is far more common than we would like to believe. Every year, hundreds of Christian and Hindu girls are forced to convert to Islam and marry their Muslim abductors, facing repeated rape, physical violence, and domestic servitude. When the girls' parents seek help from the authorities, Pakistani courts often side with the perpetrators.

Pakistan's culture of religious discrimination and the government's inability to secure religious freedom endangers its citizens—and young girls often pay the highest price. This issue is worthy of attention from American diplomats and foreign policymakers, and it should become a focus of U.S. human rights diplomacy in South Asia.

## Kidnappings and Forced Marriage in Pakistan

*“As religious extremism has gained momentum across the globe, so has Pakistan been affected by serious issues. Religious extremists come and take minority females, girls especially...to involve with them and take them for marriage. It's a very serious issue and we the minorities, the Christians and the Hindus, feel very insecure.”*

*– Mangla Sharma, Member, Provincial Assembly of Sindh Province<sup>1</sup>*

For six long months, Farah Shaheen was shackled in her abductor's house.

In June 2020, Farah was at home with her five younger siblings and elderly grandfather when she heard a knock on the door. Before her grandfather could open it, three men burst in, grabbed Farah, and forced her into a waiting van. As they kidnapped the young Christian girl, the abductors warned the family that they would “regret it” if they made any attempt to bring Farah back home.

Terrified for Farah, her family reported the crime that same day, providing the police with the name and description of the lead abductor. The officers, however, refused to register the crime, verbally abusing the Christian family and pushing Farah's father out of the office. For months, Farah's family pleaded with local authorities to simply register a report. Finally, in September, a report was filed. Despite this, the police delayed beginning the investigation.<sup>2</sup>

During this time, 12-year-old Farah endured horrors no child should. Immediately following her kidnapping, she was raped, forcefully converted to Islam, and married to her abductor. At his home, Farah spent her days either chained inside to clean the house or outside to care for the animals. She was frequently beaten and raped by her abuser and his landlords.<sup>3</sup>

After five grim months of slavery, local police came to the abductor's home and took Farah to a government safe house. A month later, Farah and her abductor were called to court, and the marriage was considered invalid—not because of the kidnapping and her status as a minor, but because her abuser had misfiled the marriage certificate.<sup>4</sup>

Farah was saved by a technicality.

Although she was rescued and returned to her family, Farah continues to struggle with the physical and mental consequences of her trauma—trauma that far too many girls face in Pakistan today. While there are no official estimates, likely hundreds of Christian and Hindu girls in Pakistan are forced to convert to Islam and marry their Muslim abductors. The U.S. State Department cites the Human Rights Commission of Pakistan’s estimate that there are approximately 1,000 instances of this phenomenon in Pakistan every year.<sup>5</sup>

The horrific practice is typically concentrated within the provinces of Sindh and Punjab. Victims are usually taken by men looking for brides and, once legally “converted,” are quickly married off to their abductors. This abusive practice depends upon several adverse factors in order to exist: Islamic clerics who are willing to solemnize the underage marriages, magistrates who make the marriages legal, and corrupt authorities who refuse to investigate despite the obvious criminal nature of these marriages.<sup>6</sup>

Many police officers are not experts on this issue and are ill-equipped to fully investigate cases to determine if a conversion has been forced or not. Other officers accept bribes from the perpetrators to stay silent or sabotage the investigations.

Although most instances of forced conversion never receive international attention, several notable cases in the past few years have sparked global outrage. In August 2020, a young Hindu girl named Miza Kumari was abducted, raped, and forcefully converted to Islam. For months, Miza’s parents pleaded with the police to rescue their daughter; however, the authorities refused to open a case. In January 2021, an activist tweeted a video of Miza’s parents begging for help: “We’ll kill ourselves if our daughter is not given back. We are poor, we can’t fight with culprits, no one is helping us in Pakistan. We request, who[ever is] watching this video to help us.”<sup>7</sup> Rather than investigate Miza’s case, the local police filed charges against her father for his efforts to raise public awareness. While Miza’s parents face the consequences of their viral petition, Miza continues to live in the custody of her abductor.<sup>8</sup>

Huma Younus, a Christian girl kidnapped at 14 years old, also remains trapped. In October 2019, three men waited until Huma's parents left their home before barging in and taking Huma by force.<sup>9</sup> A few days later, the kidnappers sent Huma's parents copies of a marriage certificate and documents alleging her willing conversion to Islam.<sup>10</sup>

Huma's parents filed a petition with the Sindh High Court, seeking annulment of the marriage on the basis of the Sindh Child Marriage Restraint Act of 2013,<sup>11</sup> which forbids marriage below the age of 18. In February 2020, the Sindh High Court in Karachi stunned human rights advocates by ruling that Huma's marriage was legal based on Islamic law, which says men can marry underage girls if they have had their first menstrual cycle.<sup>12</sup>

At 15 years old, Huma managed to reach out to her parents by phone in July of 2020. She told them she was confined to one room in her abductor's house and was pregnant from repeated rape.<sup>13</sup> Most recently, in September 2020, a Judicial Magistrate in East Karachi issued a warrant for the arrest of her kidnapper, Abdul Jabbar. However, police have delayed acting upon the arrest warrant. To this day, Huma remains in the custody of her kidnapper.<sup>14</sup>

When forced conversion and marriage cases are brought before the authorities, police are often reluctant to help the victims. USCIRF's 2021 annual report found that "authorities often do not take any action, and in abduction cases that are brought to the courts, officials have claimed that victims willingly converted to Islam."<sup>15</sup> Not only are they reluctant to help or advocate for victims, but police have been reported to act in favor of the abductors. As noted by the All-Party Parliamentary Group (APPG) for Pakistani Minorities in the UK parliament, "...[T]he attitude of police officers towards the family of the victim is not only unsympathetic and condescending but sometimes hostile. The influence of the religious lobby, societal discrimination against minorities and pressure from the influential abductors makes them quasi aiders and abettors of the abductors."<sup>16</sup> Police officers are also interfering with investigations by actively discouraging Christian and Hindu families from filing First Information Reports (FIRs), formal complaints required to begin the investigation process.<sup>17</sup>

In early 2021, an underaged Hindu girl, Neena Kumari, experienced the depth of corruption within the Pakistani police force. Ghulam Maroof Qadri, a policeman stationed in the Nashharo district in Sindh province for the “security of the area’s minority residents,” abducted Neena, took her to a mosque nearly 300 miles away from her home, forced her to convert to Islam, and married her.<sup>18</sup> Neena remains in his custody despite efforts to rescue her. As a result, the Hindu community in Nashharo declare they can no longer trust the police to protect their daughters.<sup>19</sup>

Forced conversions are defined here as changing one’s religion (in Pakistan, there is a legal process for this) under duress. The UN Special Rapporteur on the sale and exploitation of children has made it clear that “when the conversion is made under duress it becomes a violation of human rights.”<sup>20</sup> Although the perpetrators of forced conversion and forced marriage are in violation of both domestic Pakistani law and international law, the religious dynamics of such cases make them more contentious. Any ruling in favor of a Christian, Hindu, or Sikh victim could be perceived as an attack on Islam, the nation’s majority faith. Pakistan’s democracy is young, and its rule of law is weak. The combination of religious tensions and the government’s miscarriage of justice create an environment where perpetrators can target their victims and commit crimes with impunity.

Perpetrators often choose Christian and Hindu girls as victims so they can use the religious tensions to cover up their crimes. When a possible instance of forced conversion occurs, the perpetrator will often tell Muslim members of the community that it is inappropriate to question someone’s conversion to Islam. Girls often face threats against their safety or against their families, making it dangerous to tell authorities or the courts that they did not convert to Islam according to their own will.

When girls are legally converted to Islam, they are bound by Islamic family law, not the country’s secular law. Islamic law accepts that a girl can be legally married when she reaches physical maturity upon her first menstrual cycle.<sup>21</sup> Perpetrators often fabricate their victims’ conversions to Islam as a means to escape punishment for their marriage to underage girls, which would otherwise be criminalized under secular law. This is why the courts recognized Huma Younas’ marriage despite her status as a minor.

While many cases of forced conversions and marriages go unreported, the past several years have seen a startling 162 recorded cases of Hindu and Christian girls and women forcibly converted to Islam and married to their abusers.<sup>22</sup> In 2021 alone, 36 underage non-Muslim girls were confirmed to have been kidnapped, forcefully converted, and married to their captors.<sup>23</sup> However, there are likely hundreds of incidents that have never been met with media coverage.

Not all cases of forced conversion begin with abductions. Sometimes, men will use human trafficking tactics to convince a young girl that she is in love with him, then pressure the girl into prostitution or keep her as his own wife. In its most recent annual report on the varying effects of persecution on men and women, Open Doors noted, “Traffickers often attempt to cloak the associated sexual violence behind a claim that the girl is now married, which in reality is often a forced marriage or a marriage resulting from targeted seduction.”<sup>24</sup>

The prevalence of cases and the government’s inability and/or unwillingness to enforce justice make this an issue worthy of more international attention.

## **Social Discrimination Enables Abuse of Christians and Hindus**

Pakistan’s failure to protect religious freedom and respect its people’s human dignity fosters a culture in which the heinous practice of forced conversion—often followed by rape and forced marriage—thrives.

Islam is the state religion of Pakistan, but its constitution states, “Subject to law, public order, and morality, every citizen shall have the right to profess, practice, and propagate his religion.”<sup>25</sup> Despite these constitutional qualifiers to religious freedom, religious minorities, including Ahmadi Muslims, Christians, Hindus, and Sikhs, face persecution from authorities and social harassment. Therefore, Pakistan is designated by the U.S. State Department as a Country of Particular Concern (CPC) for engaging in or tolerating “particularly severe” religious freedom violations.

The State Department’s International Religious Freedom Report in 2020 cited intelligence that the Pakistani government “was inconsistent in safeguarding against societal discrimination and neglect, and

that official discrimination against Christians, Hindus, Sikhs, and Ahmadi Muslims persisted to varying degrees...”<sup>26</sup> Members of religious minority communities claim that authorities at the federal and provincial levels apply Pakistani secular law inconsistently.<sup>27</sup> This includes the federal Ministry of Law and Justice, the federal Ministry of Human Rights, and its provincial counterparts.<sup>28</sup>

Pakistan actively enforces blasphemy laws, which prohibit insulting religion and are utilized against Muslims and non-Muslims alike. Section 295-B of the Pakistani penal code states whoever “defiles, damages or desecrates a copy of the Holy Qur’an” can be punished with imprisonment for life.<sup>29</sup> Section 295-C states that insults against the Prophet Muhammad are punishable by life imprisonment or death.<sup>30</sup>

Blasphemy laws violate the freedom to live out one’s faith through expressing one’s beliefs. The mere fact that blasphemy laws remain on the books legitimizes and emboldens violence against non-Muslims who are perceived to have insulted Islam. Even when someone accused of blasphemy is acquitted, mobs have often formed, threatening to punish perceived blasphemers themselves.<sup>31</sup> This trend contributes to an environment in which government officials are afraid to enforce justice.

When the governor of Punjab province, Salman Taseer, spoke up in defense of Asia Bibi, a Christian woman sentenced to death for blasphemy, he was assassinated at a public market by his own bodyguard.<sup>32</sup> The threat of mob violence places a great deal of pressure on Pakistani officials not to offend Islamist sensibilities.

The Pakistani court system is not immune from this type of coercion. A University of Birmingham report notes the case of Anjali, a young Hindu girl who had been kidnapped and forcibly converted. Approximately “1,500 people gathered outside the court and the physical threat of those present [pressured] the judge to give in to the demands of the Muslim man.”<sup>33</sup> These conditions make it difficult for victims of crimes from religious minority communities to receive justice.

In addition, both lower courts and the High Courts of Pakistan often neglect to follow their own procedures when it comes to forced conversion cases. The U.S. Commission on International Religious

Freedom's (USCIRF) 2021 report states that "Pakistani courts systematically failed to protect and provide justice to victims, who are often forced to testify that they converted voluntarily to protect themselves and their families from further harm."<sup>34</sup> Regularly, no investigation into the circumstances of the professed conversion takes place, but "the simple existence of a conversion certificate is taken as sufficient proof."<sup>35</sup> Once the conversion is accepted in court, judges apply Sharia law rather than secular law. Due to this, in the majority of cases, the decision will favor the perpetrator, and the girl will be required to remain in the custody of her abuser.<sup>36</sup> The commonplace nature of these occurrences speaks to the need for Pakistan's rule of law to be strengthened and for its police departments to be held to a higher standard of accountability.

In August 2020, when Maira Shahbaz was ordered by a Pakistani court to resume living with the man who had kidnapped her, she broke down in tears. The court's decision came several months after three armed men had intercepted Maira while she was walking home and forced her into a car, shooting wildly into the air as they drove away.<sup>37</sup> One of the men, Mohamad Nakash, forged a fake marriage certificate and claimed she had converted to Islam.

Maira's parents desperately sought custody to recover their daughter. Although her parents had the legal birth certificate proving Maira was only 14 years old, Nakash's forged marriage documents falsely claimed she was 19 years old. Even the imam whose signature was allegedly on the marriage certificate denied the certificate's legitimacy. In July 2020, the Faisalabad District and Sessions Court removed Maira from her abductor's custody and placed her in a women's shelter until a ruling could be made. Unfortunately, the Lahore High Court chose to send Maira back to the abusive arms of her captor the following month. The court ruled that the young Christian girl had voluntarily converted to Islam and that her marriage to the 28-year-old Nakash was legal, even though he already had another wife.

USCIRF analysis of similar cases in Pakistan found that "the women are reportedly questioned in front of the men they were forced to marry, creating pressure to deny coercion." Maira's parent's lawyer Sumera Shafiq suggests similar intimidation in her case, saying, "The girl was subjected to threats from her rapist, so she had to state in favor of him in court."



After the High Court ruling, Maira successfully escaped from Nakash and went into hiding with her family in September 2020.<sup>38</sup> But Maira has not yet found safety. She still receives death threats from her abductor and his supporters who label her an apostate. Maira and her family are currently seeking asylum in the United Kingdom, a request that has been pending for two years.<sup>39</sup> Maira's story is just one of many demonstrating the disastrous consequences of the corruption in the Pakistani court system.

This issue is further aggravated by the discriminatory legacy of the former Indian caste system. Most Pakistani Christians are descendants of lower-caste Hindus, who converted to Christianity by the thousands. Christians are often still derogatorily considered “untouchable” or “unclean.”<sup>40</sup> As some of the poorest people in Pakistan, Christians have limited options for work. They have high illiteracy rates and are often relegated to menial jobs as farmhands, sanitation workers, or street sweepers. But these jobs carry stigmas of their own, reinforcing cultural discrimination against them. Pakistani Hindus, particularly those of a lower caste, endure similar treatment. They are also often discriminated against regarding housing, employment, and access to government assistance programs.<sup>41</sup>

The marginalized position that religious minorities occupy in society leaves non-Muslim girls vulnerable to being preyed upon. Predators know if they target a religious minority, the issue becomes about defending Islam rather than enforcing the law. Police officers, judges, and politicians are less likely to ensure that justice is carried out if the victim happens to be a religious minority and defending her could incite radicals to violence. Societal discrimination, supported by unjust blasphemy laws that incite violence against religious minorities, paves the way for young girls from Christian and Hindu communities to be targeted for kidnapping.

The provinces determine the age at which individuals can marry. Passed in 2014, the Sindh Child Marriage Restraint Act established the minimum age for marriage for both boys and girls at 18 years old.<sup>42</sup> Sindh is the only province to set the minimum age of marriage for both girls and boys at 18.<sup>43</sup> Unfortunately, the failure to fully enforce the law since its passage has proven disappointing.<sup>44</sup>

Commendably, in 2019, Pakistani Prime Minister Imran Khan called the practice of forced conversions “un-Islamic.”<sup>45</sup> Khan also ordered a probe into incidents of forced conversions of minor girls belonging

to minority communities on a case-by-case basis.<sup>46</sup> His recent behavior, however, has called into question the sincerity of his previous actions. Khan has been vocal against anti-forced conversion bills, labeling them as “anti-Islamic” and assuring clerics that he will stop such bills whenever they are presented.<sup>47</sup> In October of 2021, the Prime Minister kept his pledge and successfully blocked a pivotal anti-forced conversion bill.<sup>48</sup>

## **What Can the United States Do About It?**

This ongoing tragedy is worthy of attention from the U.S. government and must be met with strong international condemnation. The United States has long positioned itself as a leader on international human rights issues. The International Religious Freedom Act of 1998 established mechanisms within the State Department to promote religious freedom in foreign policy. As a part of ongoing efforts to advance religious freedom and human rights around the globe, particular attention should be paid to the issue of forced conversion and marriage which encompasses multiple human rights violations.

Here are a few steps the United States can take to address forced conversion in Pakistan:

### **Prioritize the issue of forced conversions and marriages in diplomatic relations, and factor this into considerations on Country of Particular Concern (CPC) designations.**

International pressure has been proven to make a difference in past persecution cases in Pakistan. Following years of international scrutiny, Asia Bibi, a Christian woman accused of blasphemy, was acquitted after spending eight years on death row.<sup>49</sup> United States officials should raise the issue of forced conversions in diplomatic meetings and highlight specific ongoing cases in which young female victims need to be protected. The status of forced conversions and marriages should also be emphasized in State Department deliberations on Country of Particular Concern (CPC) designations. In addition, the USCIRF 2021 annual report recommends that the administration lift its waiver on Pakistan’s CPC

designation, since it enables the U.S. to avoid adhering to all the diplomatic and economic actions mandated under the designation.<sup>50</sup>

In diplomatic interactions, U.S. officials can also encourage the Pakistani government to take the following actions:

- Allocate more funding and increased security to safe houses. Girls should not be required to live with the alleged perpetrator of a forced marriage before the trial. This may cause women to feel safer telling the truth in court.
- Take measures to ensure that trials regarding conversions and marriages of minority girls and women are executed impartially, taking into consideration all relevant documentation including birth certificates and First Information Reports (FIR); similarly, take measures to alleviate intimidation and coercion on female victims as they often testify in court in front of their perpetrators.
- Train teams of police officers to specialize in recognizing and investigating possible instances of forced conversion and forced marriage.
- Address corruption at all levels of the government.

### **Pass a congressional resolution urging that forced marriage and forced conversion of religious minorities in Pakistan be addressed.**

While congressional resolutions do not carry the force of law, they do communicate issues about which the U.S. government is especially concerned. A resolution on forced conversion and marriage in Pakistan will be uniquely advantageous because Pakistani religious minorities are not well-positioned to advocate for themselves. The United States must embrace its historic role as a leader on human rights issues and speak up on behalf of the persecuted and oppressed in Pakistan. The Pakistani government pays attention to international criticisms of its human rights records. A statement from the U.S. Senate, House of Representatives, or both chambers, will have an immense impact.

## **Include a special section dedicated to abductions, forced religious conversions, and forced marriages of minority girls and women in the State Department's annual Trafficking in Persons Report.**

Instances of forced conversion and forced marriages of religious minority girls potentially meet the standards of human trafficking as outlined by the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons:

Trafficking in persons' shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;<sup>51</sup>

As well as the standards of human trafficking as outlined by the United Nations Office of the High Commissioner for Human Rights:

Human trafficking is generally understood to refer to the process through which individuals are placed or maintained in an exploitative situation for economic gain. Trafficking can occur within a country or may involve movement across borders. Women, men and children are trafficked for a range of purposes, including forced and exploitative labour in factories, farms and private households, sexual exploitation, and forced marriage.<sup>52</sup>

Forced conversions and forced marriages are not only prevalent in Pakistan, but also in countries such as Nigeria and Egypt. Tracking this trend in the State Department's annual report will give policymakers and diplomats a better understanding of the scope and nature of this grave human rights issue.

## **The United States should apply targeted sanctions on Pakistani officials responsible for committing or tolerating human rights abuses.**

The U.S. government should identify Pakistani government agencies and officials responsible for severe violations of religious freedom to sanction. The Global Magnitsky Human Rights Accountability Act,<sup>53</sup> utilizing Executive Order 13818,<sup>54</sup> allows the president to block or revoke U.S. visas and to block all U.S.-based property of foreign persons engaged in serious human rights violations. The International Religious Freedom Act of 1998 also provides for visa sanctions against foreign individuals accused of religious freedom violations.<sup>55</sup> This is one of several of USCIRF's policy recommendations for the U.S. government regarding Pakistan, all of which deserve serious consideration from U.S. officials.<sup>56</sup>

## **Conclusion**

This issue of forced conversion and forced marriage in Pakistan is harrowing. Victims are ill-positioned to speak for themselves, and Pakistan's culture of religious discrimination and unwillingness to protect its minority citizens enables widespread human rights abuses. American officials should be bold in holding Pakistani government leaders and authorities accountable for allowing these crimes to continue and failing to aid the victims. Pakistan must be called to a higher standard of human rights conditions.

*Arielle Del Turco is Assistant Director of the Center for Religious Liberty at Family Research Council.*

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<sup>1</sup> "UN HRC 46 Parallel Event | No One Left Behind," Jubilee Campaign Human Rights Council Parallel Event, March 5, 2021, accessed March 22, 2021, <https://www.youtube.com/watch?v=2XHC1XYfy14>.

<sup>2</sup> Mike Thompson, "Abducted, shackled and forced to marry at 12," BBC, March 10, 2020, accessed February 13, 2022, <https://www.bbc.com/news/stories-56337182>.

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<sup>3</sup> John Pontifex, “Pakistan: Girl of 12’s Life as Chained Slave,” Aid to the Church in Need, January 19, 2021, accessed February 13, 2022, <https://acnuk.org/news/pakistan-girl-of-12s-life-as-chained-slave/>.

<sup>4</sup> Mike Thompson, “Abducted, shackled and forced to marry at 12.”

<sup>5</sup> “2019 Report on International Religious Freedom: Pakistan,” U.S. Department of State, accessed March 22, 2021, <https://www.state.gov/reports/2019-report-on-international-religious-freedom/pakistan/>.

<sup>6</sup> Inés San Martín, “Pakistani Catholic girl kidnapped and forced to marry seeks asylum in UK.”

<sup>7</sup> “‘We’ll kill ourselves if our daughter is not given back’: Read the sordid tale of Miza Kumari who was abducted, raped and converted in Pakistan,” *OpIndia*, July 8, 2021, accessed February 13, 2022, <https://www.opindia.com/2021/01/pakistan-hindu-girl-miza-abducted-raped-converted-islam-parents-threaten-suicide-details/>.

<sup>8</sup> Ibid.

<sup>9</sup> Steve Warren, “14-Year-Old Christian Girl Kidnapped, Forced to ‘Marry’ Muslim – Pakistan’s Trafficking Epidemic Explodes,” CBN News, December 2, 2019, accessed March 22, 2021, <https://www1.cbn.com/cbnnews/cwn/2019/december/14-year-old-christian-girl-kidnapped-forced-to-marry-muslim-pakistans-trafficking-epidemic-claims-629-girls>.

<sup>10</sup> Shafique Khokhar, “A 14-year-old Christian girl is kidnapped and converted in Karachi. Her parents appeal to the Court of Justice,” *AsiaNews*, December 3, 2019, accessed March 22, 2021, <http://www.asianews.it/news-en/A-14-year-old-Christian-girl-is-kidnapped-and-converted-in-Karachi.-Her-parents-appeal-to-the-Court-of-Justice-48714.html>.

<sup>11</sup> Sindh Child Marriages RestrInt Act, 2013 (Act No. XV of 2014), [https://www.ilo.org/dyn/natlex/natlex4.detail?p\\_lang=en&p\\_isn=99327&p\\_classification=04#:~:text=Prohibits%20the%20marriage%20of%20any,to%20the%20Province%20of%20Sindh](https://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=99327&p_classification=04#:~:text=Prohibits%20the%20marriage%20of%20any,to%20the%20Province%20of%20Sindh).

<sup>12</sup> “Parents angry after delay to Pakistan child bride case,” UCA News, March 18, 2020, accessed March 22, 2021, <https://www.ucanews.com/news/parents-angry-after-delay-to-pakistan-child-bride-case/87377#>.

<sup>13</sup> Massimiliano Tubani and John Newton, “Pakistan: Kidnapped Christian Girl Now Pregnant from Rape,” Aid to the Church in Need, July 10, 2020, accessed March 22, 2021, <https://acnuk.org/news/pakistan-kidnapped-christian-girl-now-pregnant-from-rape/>.

<sup>14</sup> “Huma Younus,” U.S. Commission on International Religious Freedom, accessed February 12, 2022, <https://www.uscirf.gov/religious-prisoners-conscience/forb-victims-database/huma-younus>.

<sup>15</sup> “USCIRF Annual Report 2021,” U.S. Commission on International Religious Freedom, April 2021, [https://www.uscirf.gov/sites/default/files/2021-04/2021%20Annual%20Report\\_0.pdf](https://www.uscirf.gov/sites/default/files/2021-04/2021%20Annual%20Report_0.pdf).

<sup>16</sup> “Abductions, Forced Conversions, and Forced Marriages of Religious Minority Women and Girls in Pakistan,” All-Party Parliamentary Group for the Pakistani Minorities, September 2021, <https://appgfreedomofreligionorbelief.org/media/APPG-Pakistan-Minorities-Report.pdf>.

<sup>17</sup> Ibid.

<sup>18</sup> “Abduction, Conversion, & Child Marriage of Religious Minority Girls in Pakistan,” Jubilee Campaign, 2022, <https://jubileecampaign.org/wp-content/uploads/2022/02/CEFM-Pakistan-Report-Final.pdf>.

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<sup>19</sup> Yudhvir Rana, “Pakistani Hindu Girl Abducted by Cop, Forced to Convert,” *Times of India*, February 14, 2021, accessed February 13, 2022, <https://timesofindia.indiatimes.com/city/amritsar/pakistani-hindu-girl-abducted-by-cop-forced-to-convert/articleshow/81031508.cms#>.

<sup>20</sup> “Keynote Address by Special Rapporteur Mama Fatima Singhateh,” Jubilee Campaign, March 5, 2021, accessed March 22, 2021, <https://youtu.be/oFQjeOKI5gg>.

<sup>21</sup> “Abduction, Conversion and Child Marriage of Religious Minority Girls in Pakistan,” Jubilee Campaign and Voice for Justice, November 2020.

<sup>22</sup> “Abductions, Forced Conversions, and Forced Marriages of Religious Minority Women and Girls in Pakistan,” All-Party Parliamentary Group for the Pakistani Minorities, September 2021, <https://appgfreedomofreligionorbelief.org/media/APPG-Pakistan-Minorities-Report.pdf>.

<sup>23</sup> “Record Rise in Pakistan Forced Conversion Cases,” International Christian Concern, October 18, 2021, accessed February 14, 2022, <https://www.persecution.org/2021/10/18/record-rise-pakistan-forced-conversion-cases/>.

<sup>24</sup> “Press Kits,” Open Doors USA, accessed March 22, 2021, <https://www.opendoorsusa.org/religious-freedom-newsroom/press-kits/>.

<sup>25</sup> “2019 Report on International Religious Freedom: Pakistan,” U.S. Department of State, accessed March 22, 2021, <https://www.state.gov/reports/2019-report-on-international-religious-freedom/pakistan/>.

<sup>26</sup> Ibid.

<sup>27</sup> Ibid.

<sup>28</sup> Ibid.

<sup>29</sup> “Pakistan Penal Code (Act XLV of 1860),” Pakistani.org, accessed March 22, 2021, <http://www.pakistani.org/pakistan/legislation/1860/actXLVof1860.html>.

<sup>30</sup> Ibid.

<sup>31</sup> “Blasphemy accusation in Pakistan sparks ransacking of Hindu temple, school,” Reuters, September 16, 2019, accessed March 22, 2021, <https://www.reuters.com/article/us-pakistan-blasphemy/blasphemy-accusation-in-pakistan-sparks-ransacking-of-hindu-temple-school-idUSKBN1W10MX>.

<sup>32</sup> “Punjab Governor Salman Taseer assassinated in Islamabad,” BBC News, January 4, 2011, accessed March 22, 2021, <https://www.bbc.com/news/world-south-asia-12111831>.

<sup>33</sup> Reuben Ackerman, “Forced Conversions & Forced Marriages In Sindh, Pakistan,” University of Birmingham, 2018, <https://www.birmingham.ac.uk/Documents/college-artslaw/ptr/ciforb/Forced-Conversions-and-Forced-Marriages-in-Sindh.pdf>.

<sup>34</sup> “USCIRF Annual Report 2021,” U.S. Commission on International Religious Freedom.

<sup>35</sup> Ibid.

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