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Ahmadi Muslim Lawyers Association, USA (AMLA USA) Submission



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The Ahmadiyya Muslim Lawyers Association, USA (“AMLA USA”) is an ancillary organization of the Ahmadiyya Muslim Community, USA comprised of Ahmadi Muslim legal professionals dedicated to the human and civil rights of persecuted Ahmadi Muslims worldwide.

**Ahmadiyya Muslim
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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.

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. Over a million Ahmadi Muslims currently live in Pakistan.ⁱ
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.ⁱⁱ 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.”ⁱⁱⁱ In response to urgings from the European Union, however, Pakistan *withdrew* its reservations to Articles 6, 7, 8, 18, and 19 in June 2011.^{iv} 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.^v

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 during Pakistan's 3rd UPR cycle in 2017, Member States had called on Pakistan to lift legal restrictions on freedom of religion. The Netherlands recommended Pakistan “Adopt and implement legal and practical measures to ensure the protection of religious minorities, including Ahmadis .”^{vi} The United States urged the “Repeal the blasphemy laws and restrictions and end their use against Ahmadi Muslims and others.”^{vii}
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.”^{viii}
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.^{ix} 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. Most recently, in July of 2022, three Ahmadis were arrested for sacrificing animals on Eid-al-Adha. “By performing a ritual in line with Islamic beliefs and presenting themselves as Muslims despite being Ahmadis, they have committed a cognizable offence, according to Muslim ummah’s belief, and this has grievously hurt Muslim sentiments,” the complainants stated in the report.^x
10. 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.”^{xi} Ordinance XX denies Ahmadis each of these rights. For instance, since 1984 Pakistani authorities have sealed, halted or demolished over 100 Ahmadi Muslim mosques.^{xii} They also denied the cemetery burial of 65 Ahmadis and have exhumed the bodies of 39 Ahmadis.^{xiii} In 2021 alone, mobs desecrated at least ten Ahmadiyya mosques, and some in the presence of Pakistani police.^{xiv}
11. 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.”
12. Apart from Article 260(3) and Ordinance XX, Ahmadis are also targeted by the broad anti- blasphemy provisions in Pakistan’s PPC.^{xv} Between 1984 and 2022, there were nearly 1600 blasphemy and other religious-based cases against Ahmadis.^{xvi}
13. Since the last UPR, Pakistan’s legal restrictions against Ahmadis has expanded beyond its borders. On December 24, 2020, the Pakistan Telecommunication Authority’s (“PTA”) sent a legal notice to two Ahmadi U.S. citizens. The Notice required the two Americans to remove all content from the www.trueislam.com website within a mere 24 hours of receipt of the Notice as is violated Pakistan’s blasphemy laws. The PTA also threatened penalties under Pakistan’s Prevention of Electronic Crimes Act 2016 and the Removal and Blocking of Unlawful Online Content Rule 2020, which include harsh criminal sanctions and fines of up to 500 million rupees (\$3.1M USD).^{xvii}
14. This came at the heel of the Pakistan Telecommunication Authority (“PTA”) issuing takedown notices to Google and Wikipedia to remove content associated with the Ahmadiyya Muslim Community. The PTA, citing The Removal and Blocking of Unlawful Online Content Rules 2020 (“Unlawful Online Content Rules”), required Wikipedia to remove articles portraying the head of the Ahmadiyya Muslim Community, Mirza Masroor Ahmad, as a Muslim. The PTA also required Google to remove a Google play app published by the Ahmadiyya Muslim Community, which provides Arabic and English translations of the Qur’an. Google has succumbed to this pressure and has removed all apps owned by the Ahmadiyya Muslim Community from its Google play app. The PTA has now banned over 20 websites of the Community—a clear overreach and yet another means to censor the minority community in violation of ICCPR Art. 18.^{xviii}
15. In the same vein, Pakistan’s blasphemy laws are now being used to target high level leadership of the AMC. In May of 2020, Rohan Ahmad, an Ahmadiyya Missionary, was arrested on the accusation that he possessed Ahmadiyya literature. He was charged under 298-C and 295-B, PPC & 11 of Electronic Crimes Act and remains imprisoned in Lahore.^{xix}

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

16. Ahmadis are denied the right to vote in local, provincial and national elections freely and fairly.
17. 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.
18. In 1985, General Zia split the electorate so non-Muslims would have to register on separate “non-Muslim” electoral rolls.^{xx} 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.
19. 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.^{xxi}
20. 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.*”^{xxii}
21. Under EO No. 15, all citizens, except Ahmadis, were moved to the main electoral list leaving only Ahmadis on the non-Muslim list.^{xxiii} 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.
22. EO No. 15, and its discriminatory provisions, were also made a part of the Election Act 2017 through Election (Amendment) Act, 2017 whereby Ahmadis were again added to supplementary list of voters.
23. 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.
24. 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.
25. 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 2023 general elections either.

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

26. 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:”^{xxiv} 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.*”^{xxv} Pakistanis who wish to obtain a National Identity Card are required to make a similar declaration.^{xxvi} 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.
27. 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))

28. 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.^{xxvii}
29. 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.^{xxviii}

30. 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.^{xxix}
31. 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,^{xxx} and occurred after a false allegation was made against a young Ahmadi for posting a blasphemous picture on Facebook.^{xxxi}
32. 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. No perpetrator has been convicted.^{xxxii}
33. Pakistan's persecution of Ahmadis has recently taken a high-tech turn. In mid-December 2020, trolls in Pakistan launched a coordinated hate and disinformation campaign on social media against the Ahmadiyya Muslim Community which has resulted in the uptake of hate crimes and murders of members of the already vulnerable minority group.^{xxxiii} This coordinated hate campaign had its desired effect. In 2020, there was a series of additional violent incidents targeting Ahmadis following the Tahir Naseem killing in a Peshawar courtroom. An Ahmadi trader in Peshawar was shot near his business on August 12. On October 5, Ahmadi professor Naeemuddin Khattak was shot and killed while driving home from work. On November 9, also in Peshawar, unknown gunmen killed an 82-year-old retired Ahmadi Muslim government worker while he was waiting for a bus.^{xxxiv}
34. In Feb 2021, a teenager shot and killed an Ahmadi homeopathic doctor, Abdul Qadir, in Peshawar, Khyber Pakhtunkhwa. On September 2, 2021, unidentified assailants shot and killed Maqsood Ahmad, a dual British-Pakistani citizen and Ahmadi Muslim in Nankana Sahib, Punjab^{xxxv}
35. Between July 2020 and September 2021, seven Ahmadis were murdered.^{xxxvi}
36. Ahmadis in Pakistan do not even have the fortune of resting in peace. In 2020 alone, 164 Ahmadi gravestones were desecrated, and 48 similar incidents have been documented so far in 2021. In June 2021, a violent mob obstructed the funeral procession of an Ahmadi woman in a local graveyard of Sheikhpura District, forcing the family to bury their deceased elsewhere.^{xxxvii}

E. Police Torture of Ahmadi Muslims (UNCAT)

37. 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 tortured severely. He died shortly after release succumbing to his wounds.^{xxxviii} Since 2012, there is no evidence that an investigation into the death was conducted and anyone was held responsible.
38. On December 5, 2016, during the raid of AMC offices, police arrested and beat several Ahmadis, including a foreman and some Ahmadi imams.^{xxxix} Those who were arrested were severely tortured by local police.^{xl}
39. 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 Section 48A of the Elections Act of 2017 and permit Ahmadi Muslims to vote alongside all other citizens of Pakistan as a 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

ⁱ 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.

ⁱⁱ 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.; Despite ratifying the ICCPR, as of June 2022, Pakistan was behind on three different reporting requirements per its obligations under its ratified treaties: See OHCHR: Compliance By States Parties with their Reporting Obligations to International Human Rights Treaty Bodies (3 June 2022) available at <https://www.ohchr.org/sites/default/files/2022-05/Reporting-Compliance-report-for-CM34.docx>

ⁱⁱⁱ *Id.*

^{iv} *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>.

^v 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; Amjad Mahmood Khan, Esq., Testimony: Tom Lantos Human Rights Commission (2021, 2022) available at

<https://humanrightscommission.house.gov/events/hearings/discrimination-and-persecution-against-muslims-worldwide>, <https://humanrightscommission.house.gov/events/hearings/state-religious-freedom-around-globe>

^{vi} U.N. HRC, 28th Sess., U.N. Doc. A/HRC/37/Add.1 - ¶ 4, <https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session28/PK/MatriceRecommendationsPakistan.docx>.

^{vii} *Id.*

^{viii} PAK. CONST. art. 260, § 3, available at <http://www.mofa.gov.pk/Publications/constitution.pdf>

^{ix} 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.

^x *Pakistan: Three Ahmadis Arrested for Sacrificing Animals on Eid. ThePrint*, (11 July 2022), available at <https://theprint.in/world/pakistan-three-ahmadis-arrested-for-sacrificing-animals-on-eid/1033952/>.

^{xi} Human Rights Committee, 48th 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).

^{xii} 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>.

^{xiii} *Id.*

^{xiv} UNITED STATES COMMISSION ON INTERNATIONAL RELIGIOUS FREEDOM (USCIRF), *2021 Ahmadiyya Persecution Fact Sheet* available at

<https://www.uscifr.gov/sites/default/files/2021-10/2021%20Ahmadiyya%20Persecution%20Factsheet.pdf>.

^{xv} 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>.

^{xvi} *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: Pakistan*, April 2016 (Covering Feb. 1, 2015 to Feb. 29, 2016), available at https://www.uscifr.gov/sites/default/files/USCIRF_AR_2016_Tier1_2_Pakistan.pdf; 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>

^{xvii} OHCHR Report on Disinformation; AMLA Submission (2021). Available at <https://www.ohchr.org/sites/default/files/Documents/Issues/Expression/disinformation/2-Civil-society-organisations/Ahmadiyya-Muslim-Lawyers-Association.pdf>. See also *Pakistan: Persecution of Ahmadis must end as authorities attempt shutdown of US website*. (2021, February 3). Amnesty International, available at <https://www.amnesty.org/en/latest/news/2021/02/pakistan-persecution-of-ahmadis-must-end-as-authorities-attemptshutdown-of-us-website/>; Quinn, J. (2021, February 2). *Pakistan's Disturbing Digital Threat to Americans*. National Review. Available at <https://www.nationalreview.com/2021/02/pakistans-disturbing-digital-threat-to-americans/>

^{xviii} *Id.*

^{xix} *Id.*

^{xx} 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.

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

^{xxii} *Id.*

^{xxiii} “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

^{xxiv} Application Form for Passport, available at <http://www.embassyofpakistanusa.org/forms/A%20form%20fillable.pdf>.

^{xxv} *Id.*

^{xxvi} 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>.

^{xxvii} *A Report on the Persecution of Ahmadis in Pakistan during the Year 2016*, *supra* note xii at 129.

^{xxviii} See *supra*, note xii.

^{xxix} 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>;

^{xxx} *The Gujranwala Riot*, THE PERSECUTION OF AHMADIS, <https://www.persecutionofahmadis.org/the-gujranwala-riot/>.

^{xxxi} 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>.

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

^{xxxiii} Gannon, K. *Trolls flood social media in Pakistan amid virus lockdown*. AP NEWS (August 27, 2020), available at <https://apnews.com/article/virus-outbreak-ap-top-news-religion-music-middle-east-1daafaf0f6775813361081d3cb1f8257>

^{xxxiv} OHCHR Report on Disinformation; AMLA Submission (2021). Available at <https://www.ohchr.org/sites/default/files/Documents/Issues/Expression/disinformation/2-Civil-society-organisations/Ahmadiyya-Muslim-Lawyers-Association.pdf>

^{xxxv} UNITED STATES COMMISSION ON INTERNATIONAL RELIGIOUS FREEDOM (USCIRF), *2021 Annual Report: Pakistan*, available at <https://www.state.gov/wp-content/uploads/2022/05/PAKISTAN-2021-INTERNATIONAL-RELIGIOUS-FREEDOM-REPORT.pdf>

^{xxxvi} UNITED STATES COMMISSION ON INTERNATIONAL RELIGIOUS FREEDOM (USCIRF), *2021 Ahmadiyya Persecution Fact Sheet* available at <https://www.uscirf.gov/sites/default/files/2021-10/2021%20Ahmadiyya%20Persecution%20Factsheet.pdf>.

^{xxxvii} *Id.*

^{xxxviii} 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>.

^{xxxix} *A Report on the Persecution of Ahmadis in Pakistan during the Year 2016*, *supra* note xii at 1.

^{xl} 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>.