

Combating the Persecution of Christians Worldwide:

A framework for Western engagement

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ADF INTERNATIONAL

Summary

Since the days of Christ's first apostles, Christians have faced persecution for their faith. Recent research confirms that the current global persecution of Christians is severe and has been on the rise over the past several years. This white paper outlines a high-level and comprehensive approach to responding to and preventing religious persecution. The paper begins by offering an overview of religious freedom in international law. It then discusses legislative advocacy, as so much of the persecution Christians face is either, on the one hand, partially caused by legislation hostile to religious freedom or, on the other, preventable through or punishable by strong religious freedom legislation. The paper then examines opportunities for political advocacy, such as training politicians friendly to religious freedom and pressuring politicians and governments to advance religious freedom. As much religious freedom advocacy takes place through the courts, the paper then devotes attention to the litigation of criminal and civil matters. Finally, because long-term and large-scale change depends on changing ideas and beliefs related to religious freedom, the paper ends by analyzing the role the Church, educational institutions, and media, including social media, can play in influencing culture and society.

About the Author

Kelsey Zorzi serves as Director of Advocacy for Global Religious Freedom with ADF International. She leads efforts to address and counter global persecution against Christians and other religious minorities. Based in New York City, Zorzi engages with relevant UN and international bodies as well as U.S.-based institutions, including the U.S. State Department, U.S. Congress, and USCIRF, in order to reassert freedom of religion as foundational to the international human rights framework. In 2018, she was elected president of the United Nations' NGO Committee on Freedom of Religion or Belief.

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1) Introduction

A recent study by the secular International Society for Human Rights estimated that Christians comprised 80 per cent of the victims of religiously motivated discrimination in the world.¹ It is estimated that 7,100 Christians died for their faith in 2015.² This number reveals a 300 per cent rise from 2013.³ Christian women in particular are targeted, facing up to twice as much persecution as Christian men.⁴ Pew Research Center reports that Christians have been persecuted in more countries (128) than any other religious group.⁵ We are seeing what Timothy Shah, director of the Religious Freedom Institute's South and Southeast Asia Action Team, has referred to as 'a global catastrophe for Christians'. This global catastrophe sometimes 'takes the form of lower level aggression,' while other times it 'takes the form of horrible, violent attacks, [and] beheadings.'⁶

Religious persecution may consist of 'any unjust action of varying levels of hostility directed to religious believers through systemic oppression or through irregular harassment or discrimination resulting in various levels of harm . . . each action having religion as its primary motivator'.⁷ Persecuted Christians are resorting to survival strategies, including going underground, fleeing, or disguising themselves.⁸ These strategies merely help to allow Christianity to persist in regions where persecution is heavy; they rarely eliminate the persecution.⁹

Who are the persecutors of Christians? While many assume, correctly, that a significant percentage of persecution of Christians occurs in Muslim-majority countries, other types of regimes are equally to blame. A large percentage of Christian persecution occurs in communist regimes like China, Vietnam, Laos, Cuba, and North Korea.¹⁰ Another type of persecution happens in countries such as India, Russia, Nepal, and Sri Lanka, where 'various forms of religious nationalism promote a fusion of state, faith, and national identity to the detriment of Christian minorities.'¹¹ A fourth category includes 'regimes that impose a harsh secular ideology, such as the post-Soviet republics of Central Asia'.¹² Finally, although

often less extreme, religious freedom abuses of Christians in Europe are increasing: 'While Christians in the West generally do not experience severe repression, they have suffered increasingly serious curtailments of their religious freedom, particularly with respect to their convictions about sexuality, marriage, and the sanctity of life.'¹³ Between the years 2007 and 2013, governmental restrictions on religion increased in 37 of the 43 European countries, and social hostilities increased in 38.¹⁴ This trend appears to be continuing, and possibly even increasing, in Europe.

In response to the present crisis, this white paper details (I) the standing of religious freedom in international law, (II) the various legislative changes needed to protect Christians from persecution and the strategy for implementing these changes, (III) the ways in which training and influencing political leaders can facilitate and complement legislative advocacy, (IV) how litigation can be most effectively used to both prosecute violators of religious freedom and defend religious minorities, and (V) the role of the Church, educational institutions, and the media in bringing about broader cultural reform. Because the persecution of Christians occurs at the hands of both state and non-state actors, this paper addresses both. Improved legislation, enforcement, and cultural shifts should impact both types of actors. It would be at odds with the focus of this paper to enter into a general discussion of state building and regime change, but it bears mentioning here that the most basic prerequisite to ending persecution is a stable political environment. The measures discussed in this paper will often do little to help Christians in failed states, as neither reform nor enforcement will generally be obtainable in such circumstances. Similarly, due to the inaccessible nature of a country such as North Korea, very little data exists upon which to base strategies for combating persecution there.

2) Overview of Religious Freedom in International Law

The majority of countries in the world have an existing duty to enact religious freedom legislation because of their obligations under international law. The primary sources of international law on freedom of religion are the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Convention on the Elimination of All Forms of Racial Discrimination.¹⁵

The Universal Declaration of Human Rights ('UDHR') was adopted by the United Nations General Assembly in 1948 without any objections.¹⁶ Article 18 of the Declaration states, 'Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.'¹⁷ Articles 2(1) and 19 of the Declaration also speak to religious freedom. Article 2(1) condemns religiously motivated discrimination that would limit enjoyment of the rights set forth in the UDHR.¹⁸ Article 19 states that everyone 'has the right to freedom of opinion and expression' and that this right includes the 'freedom to hold opinions without interference and to seek, receive, and impart information and ideas through any media'.¹⁹ While the UDHR is not binding on any state, it is viewed by the international community as 'the "common standard of achievement" against which to measure government actions'.²⁰

The international right to religious freedom achieved the status of binding law in 1966 with the International Covenant on Civil and Political Rights ('ICCPR').²¹ Unlike the UDHR, the ICCPR is legally binding on those states that ratify it. The ICCPR complements and bolsters the religious freedoms set forth in the UDHR.²² Article 18, the religious freedom article, states:

1. Everyone shall have the right to freedom of thought, conscience and religion. This right shall include freedom to have or to adopt a religion or belief of his choice, and freedom, either individually or in community with others and in public or private, to manifest his religion or belief in worship, observance, practice and teaching.
2. No one shall be subject to coercion which would impair his freedom to have or to adopt a religion or belief of his choice.
3. Freedom to manifest one's religion or beliefs may be subject only to such limitations as are prescribed by law and are necessary to protect public safety, order, health, or morals or the fundamental rights and freedoms of others.
4. The States Parties to the present Covenant undertake to have respect for the liberty of parents and, when applicable, legal guardians to ensure the religious and moral education of their children in conformity with their own convictions.²³

Section 3 of UDHR Article 18 sets forth seemingly vague and overbroad limitations on religious freedom. However, in the treaty body's General Comment 22,²⁴ the Human Rights Committee explains that such limitations must be explicitly included in Article 18 (as opposed to those found in other Articles), be proportionate in nature to the concerns at hand, be applied in a non-discriminatory manner, and 'must not be applied in a manner that would vitiate the rights guaranteed in article 18.'²⁵ Any model legislation based on Article 18 of the ICCPR should include the explanations from General Comment 22 that limit the restrictions that governments can lawfully place on the freedom of religion or belief.

One hundred and sixty-eight countries are Parties to the ICCPR.²⁶ Thus, of the 193 Members of the United Nations, only 25 have failed to ratify this treaty. However, of the countries that have ratified the treaty, a handful have made reservations on Article 18, effectively nullifying it. For example, Bahrain's reservation states that the Kingdom interprets article 18 'as not affecting in any way the prescriptions of the Islamic shariah,'

which are understood to contain limitations on religious freedom.²⁷ Mauritania and Pakistan made similar reservations.²⁸ Still, the vast majority of countries in the world have an obligation under the ICCPR to enshrine the principles of Article 18 in their domestic law.

The third core international human rights document touching on religious freedom is the International Covenant on Economic, Social and Cultural Rights ('ICESCR'). Article 2 of the ICESCR provides that the rights enumerated in the covenant may not be limited based on one's religion.²⁹ Similar to Article 18(4) of the ICCPR, Article 13(3) of the ICESCR also provides the right to religious and 'moral' education.³⁰ One hundred and sixty-five countries have ratified the ICESCR, although several have made reservations on Article 13(3).

These three documents—the UDHR, ICCPR, and ICESCR—not only explicitly carve out a right to international religious freedom, but also are considered *the* foundational human rights documents, comprising what is known as the 'International Bill of Human Rights'.³¹ The right to religious freedom is also found in other international treaties, such as the Convention on the Elimination of All Forms of Racial Discrimination (ICERD), which specifies that States should promote and protect the human rights of all, regardless of their religion.³²

Importantly, as a result of being deeply enshrined in international law, the right to freedom of religion has become what is referred to as 'customary law'. Customary law is 'a set of rules derived from the practice of states on issues that are generally accepted as law'.³³ Customary law is considered universal and exists independent of written laws. Thus, religious freedom, as a right under customary law, must be upheld by every country in the world, regardless of which treaties a country has ratified or which domestic laws it has enacted.³⁴

3) Legislative Advocacy

This section delineates the most important legislative goals for lessening the persecution of Christians. There are five primary goals: (1) Laws that allow the persecution of Christians and protect their persecutors must be repealed; (2) Laws that specifically protect religious freedom should be adopted; (3) Laws on related freedoms, including especially the freedom of speech, must be strengthened; (4) Laws that allow States that protect religious freedom to hold to account those States that do not should be enacted; and (5) Nations friendly to religious freedom ought to enact laws that provide immediate protection and assistance to Christians living in difficult regions.

A. Laws that allow for persecution

Approximately half of the countries in the world today have laws that prevent Christians from openly practicing their faith.³⁵ For example, 87 countries outlaw the 'defamation of religion', which makes it a criminal offence for a Christian to express his or her belief that the Quran is not the inspired word of God.³⁶ Seventy-one countries outlaw blasphemy,³⁷ thereby allowing, for example, the government to bring criminal charges against and even sentence to death individuals who profess the belief that Christianity is the only religion that offers eternal salvation.³⁸ Apostasy laws appear almost exclusively in Muslim-majority countries.³⁹ Twenty-four countries have apostasy laws whereby it is a criminal act for a Muslim to become a Christian in the first place.⁴⁰ In the Maldives, for example, citizens are required by law to practice Islam; thus converting to Christianity may result in the loss of citizenship or an even harsher punishment per sharia law.⁴¹ In Iran and Saudi Arabia, the laws prevent Christians from exhibiting any public expressions of their faith, including sharing it with others.⁴² Christians are not even permitted to build churches under Saudi law.⁴³

The first step in bringing an end to the persecution of Christians, especially in the Muslim world, is to repeal all laws that explicitly allow for such persecution. Every country that criminalizes blasphemy, defamation of religion, apostasy, proselytizing, public worship, or similar actions must be identified, and its legislature or government lobbied. Such laws are most common in the Middle East and North Africa, where 90 per cent (18 out of 20 countries) criminalize blasphemy and 70 per cent (14 out of 20 countries) criminalize apostasy.⁴⁴ Blasphemy laws, in particular, are in place in every region of the world.⁴⁵ Blasphemy laws are to blame for many of the most horrific cases of Christian persecution, such as the case of the Pakistani woman, Asia Bibi, sentenced to death by hanging for allegedly verbally insulting the Islamic prophet while picking berries. Ms. Bibi languished in prison on death row from 2010 to 2018, even though there was no direct evidence that she even committed the alleged offense. Although her conviction was overturned by the Supreme Court of Pakistan in October 2018, she was no longer safe in her home country and was forced to relocate to Canada, where she has likely had to take on a new identity.⁴⁶

It is also necessary to repeal laws and policies that create unwarranted administrative burdens for missionaries and other persons wishing to visit or leave countries for religious purposes, such as to receive religious education or training, or to attend conferences. For example, in Turkmenistan, religious groups are banned from providing formal religious education, and religious individuals are banned from traveling abroad to obtain such education, with the exception of Russian Orthodox men who wish to study abroad for the priesthood.⁴⁷ The Turkmen government also prevents its citizens who are known to be particularly religious from leaving the country in an attempt to block them from interacting with their co-religionists.⁴⁸ When such individuals do succeed in leaving the country, they are closely monitored upon their return.⁴⁹ Similar laws are in place in other Central Asian countries as well as Russia.⁵⁰ These laws must be repealed to allow Christians to freely live out their faith.

B. Laws that provide protection

1. Religious freedom laws

The second step toward ending the persecution of Christians involves the enactment of religious freedom laws where they do not exist and the strengthening of them where they do exist. Statutes that explicitly allow for freedom of religion must be enacted. Constitutions should also be amended to fully protect the freedom of religion as a constitutional right, effectively rendering unconstitutional laws that allow for persecution, such as blasphemy and apostasy laws.⁵¹ The three foundational human rights documents outlined in Section I provide a comprehensive template for legislators who will draft religious freedom legislation where it currently does not exist.

2. Laws on related freedoms

In addition to enacting laws that explicitly protect freedom of religion, laws protecting related freedoms must be enacted or strengthened. Freedom of conscience, freedom of speech, freedom of association, and freedom of assembly, as well as parental rights, are all essential to protect the rights of Christians to freely live out their faith and teach their children to do likewise. As with religious freedom legislation, countries that have ratified the ICCPR have an existing obligation to protect these freedoms. Commitments to uphold the freedoms of speech, assembly, and association are found in Articles 19, 21, and 22, respectively, of the ICCPR.⁵² Freedom of conscience is found in Article 18 of the ICCPR, but the language in this Article is not robust and fails to make mention of conscientious objection. Preferred model language on freedom of conscience can be found in the EU's Charter of Fundamental Rights, which explicitly includes the right to conscientious objection.⁵³ Provisions on parental rights are included in Article 18(4) of the ICCPR, which states that States Parties should 'undertake to have respect for the liberty of

parents ... to ensure the religious and moral education of their children in conformity with their own convictions.' The Convention on the Rights of the Child also contains model language on parental rights in Article 5, which sets forth that parents have rights over their children, and Article 18, which recognizes that parents 'have the primary responsibility for the upbringing and development of the child'. In theory, these related rights arguably are implied by the right to freedom of religion, but in practice, legal regimes that do a poor job of protecting related rights end up recognizing only limited and imperfect versions of religious freedom.

3. Laws that hold violating states to account

States that respect religious freedom and prioritize international religious freedom as a foreign policy objective should enact laws that allow them to hold violating States to account for failing to protect religious minorities from persecution. The United States' 1998 International Religious Freedom Act (IRFA) serves as an example of such legislation.⁵⁴ The IRFA allows, among other things, the President to implement punitive measures against countries that allow systematic, ongoing, and egregious violations of religious freedom. Section 405 of IRFA delineates fifteen different punitive measures that the President may take, including an official public demarche; the denial, delay, or cancellation of working, official, or state visits; limitations on or suspending US aid; and sanctions relating to import or export agreements.⁵⁵ IRFA further allows the US government to negotiate and enter into binding agreements with religious-freedom violating States that detail how the violating State will protect the freedom of religion.⁵⁶ In addition to punitive measures and binding agreements, the IRFA created a religious freedom office in the US State Department, along with an Ambassador-at-Large for International Religious Freedom,⁵⁷ and an independent US Commission on International Religious Freedom (USCIRF). The enactment of similar legislation in more countries committed to international religious freedom will help bring an end to the global persecution of Christians and other religious minorities.

4. *Refugee and asylum measures*

Those countries that are committed to ending the persecution of Christians worldwide should also implement refugee and asylum measures that allow the persecuted to seek and remain in safe havens. The 1951 Refugee Convention, ratified by 145 States, 'asserts that a refugee should not be returned to a country where they face serious threats to their life or freedom,' otherwise known as non-refoulement.⁵⁸ One of the enumerated freedoms in the Convention is the freedom of religion. The principle of non-refoulement is considered a rule of customary international law and is thus applicable to all States. Both refugees, who are outside of the country in which they seek safe haven, and asylum seekers, who are already residing in the country where they seek refuge, need assistance in convincing governments that they are of special humanitarian concern because of a well-founded fear of persecution based on their religion.⁵⁹

Some countries are hesitant to grant Christians asylum on the basis of religious persecution. Sweden, for example, is thought to deprioritize persecuted Christians when making refugee and asylum determinations. Sweden is currently threatening to deport a formerly-Muslim Christian woman back to Iran even though she will be at high risk for imprisonment, rape, and death.⁶⁰ Swedish refugee lawyer Gabriel Donner claims that there is one judge, in particular, in Stockholm who has never granted asylum to a Christian, regardless of whether the asylum seeker had a well-founded fear of persecution because of his or her faith.⁶¹ As a State Party to the 1951 Convention Relating to the Status of Refugees, Sweden is violating its duties under international law, as well as those under customary international law, to protect those who have a well-founded fear of being persecuted because of their religion (Article 1A(2)).

Similarly, there is evidence that the Obama Administration intentionally denied entry of Middle Eastern Christians refugees into the United States. For example, during his Administration, the United States government accepted 10,801 Syrian refugees, 56 of whom were Christian.⁶² Therefore, while Christians were thought to make up 10 per

cent of the Syrian population, only half of one per cent of the Syrian refugees allowed entry into the United States were Christian.⁶³ Many Christian civil society groups noted that in 2016, the Obama Administration admitted more Muslim refugees than Christian refugees. Seemingly in response to what it determined to be discrimination against Christians, the Trump Administration reversed this trend, admitting more Christian refugees than Muslim refugees.⁶⁴ Assistance to refugee and asylum seekers is of special strategic importance because it can be of immediate help to those suffering during this present crisis.

5. *Humanitarian assistance*

In addition to refugee and asylum measures, it is critical that persecuted Christians benefit from foreign aid, in order to preserve the remnants of Christianity that exist in the most anti-Christian regions of the world. Too often, persecuted Christians fail to receive any foreign humanitarian assistance due to the fact that they practice Christianity. The United States' humanitarian aid to the victims of the ISIS genocide in the Middle East serves as an example. Although the United States donates more humanitarian aid than any other country in the world,⁶⁵ the Christian victims of the ISIS genocide until recently received little-to-no assistance from the US government.⁶⁶ The US was funnelling its humanitarian aid through the United Nations Development Program (UNDP), which was dispersing the aid at UN-controlled camps—camps that were not safe for Christians as they housed ISIS-sympathizers.⁶⁷ To ensure that Christians actually received humanitarian aid from the US government, the Trump Administration implemented new policy measures that utilize USAID, not the UN, to directly assist persecuted Christians in the Middle East.⁶⁸ The US government also recently passed a major aid bill for genocide relief in Iraq and Syria.⁶⁹ This aid will help to keep Christianity alive in a region where it is on the brink of extinction. At the same time, this aid will assist in the survival of Christianity in Iraq and Syria only if issues of repatriation, physical security (especially as new Shiite militia groups have formed),

infrastructural and economic development, and local non-discrimination are prioritized.⁷⁰

6. *Safe havens*

Finally, some religious freedom advocates support legislation establishing safe havens, both permanent and temporary, for persecuted Christians in their historic homelands. Such legislation is being discussed in regions where there is no end in sight to the persecution of Christians, and the indigenous Christians either do not want or are not able to flee the persecution. An example of this scenario can be seen in the post-ISIS Middle East, where Christians have proposed establishing a permanent province in the Nineveh Plain.⁷¹ Some religious freedom advocates have supported legislation such as US Congressman Jeff Denham's H. Res. 741 (115th Congress), which would direct the US government to 'support the establishment of a self-governing province in the Nineveh Plain' for persecuted Christians in the Middle East.⁷² However, emerging concerns around Iran-backed Shiite militias in this region might prevent such legislation from providing any feasible solutions.⁷³ Similarly, there is also a need for legislation that would reduce barriers for persecuted Christians in war-torn areas seeking refuge in temporary refugee camps while their homes are being rebuilt.

C. Strategies for supporting legislative efforts

This section details strategies for implementing the legislative goals outlined above, namely to support efforts aimed at (1) repealing laws that allow persecution; (2) enacting religious freedom laws; (3) strengthening laws on related freedoms; and (4) enacting laws that prioritize persecuted Christian and other religious minority refugees and asylum seekers, strengthen humanitarian assistance to persecuted Christians and other religious minorities, and establish safe havens for persecuted Christians in the Middle East and elsewhere. A multi-pronged strategy is needed to achieve these goals—one that both is innovative and utilizes the various

networks and mechanisms already in place. In order to achieve these legislative goals, legislators must be trained and equipped. International mechanisms, such as the United Nations' Universal Periodic Review (UPR) and Special Rapporteurs, must be used more effectively to pressure governments to change their laws and policies. Civil society must lobby countries that have ratified the ICCPR or ICESCR to enact legislation that fulfils their duties under these treaties. And UN Member States committed to international religious freedom must table resolutions that will bring religious freedom back into the international human rights conversation and thereby garner greater political will on the topic.

1. Connecting with and equipping legislators

In order to bring about legislative changes, religious freedom advocates must support legislators and legislative nominees who are committed to ending the persecution of Christians in their territories. Advocates should also train and equip both current legislators and those situated to influence or become legislators. Many legislators working on religious freedom express a lack of awareness about the realities of the Christian persecution in their countries. Without awareness, they lack the impetus to repeal or amend existing legislation. Without training, they lack the expertise to scrutinize proposed legislation with an eye for ensuring that it does not infringe upon the right to religious freedom or related rights.

The most effective way to help train and equip legislators about the persecution of Christians is for religious freedom advocates to link up with both Christian and religious freedom parliamentarian networks. Several are already in existence, including (1) the International Panel of Parliamentarians for Freedom of Religion or Belief, (2) the International Catholic Legislators Network, and (3) the Political Network for Values. These networks include many parliamentarians from all areas of the world who are committed to ending the persecution of Christians. Local non-governmental organizations ('NGOs') can use these networks to connect with likeminded parliamentarians in their regions and work with

them on amending current legislation or introducing new legislation. They can also warn these parliamentarians of problematic legislation that is under consideration in their respective parliaments. It is also important for legislators in countries that are more amenable to religious freedom to partner and strategize with those who are in more restrictive countries. Countries that have unenforced blasphemy laws can support reform in countries like Pakistan by repealing their unenforced laws, thereby creating a domino effect that will eventually have wide impact.⁷⁴ Ireland recently removed its constitutional ban on blasphemy, while New Zealand has repealed its 'blasphemous libel' law.⁷⁵

Such parliamentary networks also provide legislators with the emotional support needed to spearhead legislation that will be unpopular at best and career- or life-altering at worst. In 2017 in south-eastern Pakistan, for example, the government of Sindh Province rejected a law that would have criminalized forced conversions.⁷⁶ Upwards of one-thousand Pakistani girls are forced to convert to Islam annually.⁷⁷ Despite the fact that the provincial assembly had unanimously adopted the law to ban forced conversions, thirteen of the legislators who drafted the bill were met with death threats.⁷⁸ In light of this reality, it is essential that networks of legislators committed to advancing religious freedom are created, strengthened, and also equipped to support their members who may face severe hostility when advocating for legislative change.

In addition to plugging into these networks, religious freedom advocates must help to strengthen the networks themselves. Strengthening can be achieved through participation at the administrative level, provision of financial resources to fund travel for the purpose of meeting with key community leaders or victims of persecution, and organization of trainings and events that allow the parliamentarians to network with each other and likeminded NGOs.

2. Utilizing international mechanisms

Governments and NGOs alike must also utilize available international mechanisms to pressure countries with laws that enable Christian persecution to make legislative changes. One mechanism provided by the United Nations is that of the special procedures of the Human Rights Council. The special procedures are 'independent human rights experts with mandates to report and advise on human rights from a thematic or country-specific perspective'.⁷⁹ One critical aspect of the religious freedom landscape at the United Nations is the Special Rapporteur on Freedom of Religion or Belief, which the Commission on Human Rights created in 1986.⁸⁰ The terms of reference for the Special Rapporteur's work task the mandate holder with 'examining incidents and government actions that were in violation of ... enunciated standards'.⁸¹ Specifically, the Special Rapporteur is mandated to: (1) transmit 'urgent appeals and letters of allegation to States with regard to cases that represent infringements of or impediments to the exercise of the right to freedom of religion and belief'; (2) 'undertake[] fact-finding country visits'; and (3) 'submit[] annual reports to the Human Rights Council and General Assembly on the activities, trends, and methods of his or her work'.⁸² NGOs must work directly with the UN Special Rapporteur on Freedom of Religion or Belief, as well as with the Special Rapporteurs with country-specific mandates, such as Sudan and Iran, to provide information that will help them bring awareness to the international community about the persecution of Christians worldwide or within their respective mandates.

In addition to the mandate holders, the UN's Universal Periodic Review (UPR) provides Member States committed to ending the worldwide persecution of Christians an opportunity to pressure the worst offenders to change their laws, enforce their laws, or implement new policies. The UPR is 'a unique process which involves a periodic review of the human rights records of all 193 UN Member States'.⁸³ Since the UPR's inception in 2008, States have made 1,538 recommendations on freedom of religion and belief.⁸⁴ Compared to other categories of UPR

recommendations, this number is incredibly low (ranked 24 out of 30 categories).⁸⁵ Of the more specific recommendations, fifteen address blasphemy laws,⁸⁶ twelve reference anti-conversion laws,⁸⁷ forty-one relate to conscientious objection to military service,⁸⁸ and three refer to decriminalizing proselytizing.⁸⁹ Of the 1,358 recommendations, only twenty mention the persecution of Christians (and five of these twenty are aimed at Israel).

In light of the fact that Christians are the most persecuted group worldwide, it is perplexing that there have only been twenty religious freedom recommendations that refer to the specific plight of Christians. While the precise impact of UPR recommendations is unknown, the recommendations are indeed reviewed by the receiving States and a lack of recommendations on the issue of Christian persecution undoubtedly signals to countries that allow Christian persecution that they need not focus on the issue.

The lack of UPR recommendations that speak to the persecution of Christians must change. UPRs can be used to (1) pressure all States that are not party to the ICCPR or the ICESCR to ratify the international human rights treaties that touch on religious freedom, (2) raise specific concerns about the persecution of Christians, and (3) raise general concerns about the lack of religious freedom in certain countries.

The recently formed International Contact Group for Freedom of Religion or Belief (ICG-FoRB) could be used to increase the number of UPR recommendations related to ending Christian persecution. In 2017, Canada and the United States formed the ICG-FoRB which serves as the first unofficial group of governments committed to protecting international religious freedom.⁹⁰ With over twenty countries from different regions of the world, the Group potentially has great influence. If each of its members committed to making a modest number of specific religious freedom focused UPR recommendations per year, and did so in coordination with other members, the attention to this topic would increase greatly. The ICG-FoRB is also situated to work collectively to bring about greater attention to religious freedom and persecuted Christians in

UN resolutions, whether at the General Assembly or the Security Council. In 2019, the United States created another multilateral platform for international religious freedom called the International Religious Freedom Alliance. While the Alliance is not yet up and running, it will likely provide an additional avenue to influence legislation worldwide.

3. *Best practices*

Civil society groups have an integral role to play in bringing about the legislative changes needed. Several types of actions are particularly strategic. Christian NGOs need to educate secular human rights organizations about the reality that societies that fail to protect religious freedom are unlikely to protect other human rights. Secular human rights organizations ideally would become far more attuned to religious persecution than they are currently. Additionally, NGOs can engage China, India, Russia, Muslim-majority nations, and other states ambivalent toward or opposed to international human rights norms by appealing to 'self-interest, peace, and stability,' and their own countries' traditions, rather than to universal human rights.⁹¹ In a speech given on Capitol Hill on 8 May 2018, US Ambassador-at-Large for Religious Freedom Sam Brownback argued that international religious freedom advocacy will be most successful if governments are convinced of the causal correlations between religious freedom and economic growth, and religious freedom and national security. Recent research supports this claim. A study conducted by the Religious Freedom Institute shows that where religious freedom increases, terrorism decreases.⁹² A 2014 study by researchers at Georgetown University and Brigham Young University similarly showed that religious freedom has a significantly positive impact on economic growth, in part because restrictions on religious belief and practice drives away local and foreign investment.⁹³ As many governments prioritize issues related to national security and economics over human rights issues, religious freedom advocates will be most effective if they highlight

the direct and positive impact religious freedom has on security and economic growth.

Christian NGOs should also be careful to advocate for all religious minorities, both because religious freedom is for all people and because secular policymakers are more open to such broad-based advocacy. In all their actions, NGOs ought to stress the importance of religious freedom, as opposed to ‘interreligious dialogue’ and other less robust concepts. While interreligious dialogue can be a first step in helping those belonging to majority religious groups better understand the plight of those belonging to minority religious groups, religious freedom, not mere dialogue, is the ultimate goal. With regard to persecuted Christians in need of international assistance, NGOs must balance advocating for asylum reforms and helping victims to find ways to return to their homes in safety.

NGOs also have a critical role to play in building networks and mobilizing communities. Such networks—including, for example, churches, private citizens, and other concerned parties—can be especially helpful in communicating the experiences of the persecuted Church. The sharing of information is often a prerequisite for mobilization, and NGOs can help to organize communities, especially diaspora communities from places plagued by persecution, to bring pressure on lawmakers and international bodies. The International Religious Freedom Roundtable in Washington DC has become a large and regularly scheduled gathering for NGOs working on religious freedom to meet and share initiatives and developments while also interacting with government representatives. Similar roundtables, groups, and partnerships have developed in many countries around the world and are spreading. The US government’s annual Ministerial to Advance Religious Freedom and regional Ministerials provide a key platform for NGOs wishing to expend their networks and highlight their work through hosting and participating in side events.

4) Political Advocacy

A. Efforts to train and support government officials committed to religious freedom

Ideally, those who are directly responsible for the enforcement of laws would be trustworthy public servants, attuned to the importance of religious freedom. The most fundamental way to promote sound enforcement of religious freedom laws is to train and support reliable people in key positions. Religious freedom advocates, therefore, should organize for the purpose of training and supporting officials at all levels on the importance of religious freedom.

Once these officials are trained, advocates must continue to build strong, reliable relationships with them. Building trust is important for when officials may need to act in an unpopular manner to defend religious freedom. Advocates can help craft the best campaigns and strategies to weather those difficult storms. Similarly, advocates should monitor the actions of officials to make sure that they are prioritizing the advancement of religious freedom, and should build public campaigns, when appropriate, that incentivize officials to keep religious freedom as a priority.

B. Increasing pressure from the international community and individual governments

As exemplified by the cases of Meriam Ibrahim and Andrew Brunson, it can be strategic to create international pressure toward the proper resolution of cases involving the persecution of Christians. The most direct form of such pressure involves sanctions. For example, as stated previously, the International Religious Freedom Act (IRFA) allows the United States to sanction those countries that have been designated 'countries of particular concern', often the worst violators of religious freedom,⁹⁴ while other mechanisms such as the Global Magnitsky Act and EO 13818 allow for sanctions targeting particular individual human

rights abusers. Sanctions ought to be levied not only against countries in which Christians are persecuted by state actors but also against countries that fail to prosecute the persecution of Christians by non-state actors.⁹⁵ Direct advocacy targeted towards government officials in the United States and other nations, especially with the aid of engaged parliamentarians and legislators, can potentially help to bring about the implementation of such sanctions.

Aid can also be used to pressure countries into enforcing their laws. Nations and international bodies can, for example, allocate financial assistance for judicial reform or make assistance contingent on a government's willingness to enforce religious freedom legislation. Effective ways to bring about reform may involve requiring external (international) oversight of judiciaries and police forces in addition to internal representation of religious minorities within judiciaries, prosecutorial offices, and police forces.

Simpler and potentially similarly effective is the public shaming of violators of religious freedom. Publicizing a nation's or (perhaps especially) a specific locale's failures to enforce the law can bring unwanted attention and stimulate action. Existing UN mechanisms can be used to challenge countries who fail to meet their obligations under international law to protect Christian minorities. The most obviously relevant mechanism is the UPR, as discussed above. Ideally the Membership of the ICG-FoRB would grow in number and strength and lead to a dramatic increase in the number of UPR recommendations related to religious freedom in general and the persecution of Christians specifically. Public shaming can also be achieved through the United Nations' General Assembly and Human Rights Council's country-specific resolutions, which can be used to point out the ways in which certain countries fail to protect religious freedom and related freedoms. Reports by UN Special Rapporteurs or statements by Ambassadors, Special Envoys, Commissioners, and NGOs who have an interest in freedom of religion, as well as high-profile events like the US Ministerial to Advance Religious Freedom, can all be vehicles for publicizing the shameful actions of religious freedom violators.

5) Litigation

Even well-crafted laws on religious freedom and related freedoms will be of little help if they are unenforced or unfavourably interpreted. At the same time, even imperfect laws can be extremely beneficial if interpreted favourably and enforced consistently. There are several types of strategies that can be used to help governments to favourably interpret and consistently enforce their laws. Many times, whether the laws are just or unjust, the persecution of Christians must be combatted through criminal or civil litigation.

A. Criminal matters

1. Assisting prosecutorial work

Some violations of religious freedom are criminal matters where the perpetrator has committed a crime, such as when Christians are physically injured or murdered because of their faith. In such cases, Christians are victims, and religious freedom advocates must work to ensure that the criminal justice systems in their respective regions do not allow impunity.⁹⁶ There are several ways religious freedom advocates can assist and prod police and prosecutors. To begin with, civilian advocates can provide evidence to prosecutorial teams. This practice is becoming increasingly common in jurisdictions where prosecutors are relatively overburdened. Religious freedom organizations can train their teams to properly collect and preserve evidence and build relationships with police and prosecutors.

a. Training law enforcement

It is also possible to create opportunities to train police officers and prosecutors on matters related to religious freedom. There can be no assumption that such officials actually understand the religious freedom legislation in their jurisdictions. Nor can it be assumed that they are aware of the common violations of religious freedom taking place within

their territories. When incompetence is a possible explanation, training and equipping can lead to significant changes in the enforcement of religious freedom laws. The International Justice Mission (IJM), an NGO focused on ending human trafficking,⁹⁷ has had great success in training and equipping local law enforcement in many different countries. In Cambodia, for example, IJM successfully attracted a large number of local police officers to its trainings on human trafficking by paying them a daily allowance for their attendance.⁹⁸ IJM has been known to build solid relationships with both law enforcement and the judiciary in the regions in which it operates to ensure that cases are handled correctly from the start of the investigation to the eventual verdict. IJM assists police with their investigations and prosecutors with their prosecutions, thus lightening their loads and making convictions more likely.⁹⁹ Where the dynamics make it possible, religious freedom advocates could benefit from taking a similar approach.¹⁰⁰

b. Supporting victims as they interact with the legal system

Religious freedom advocates can also do a great deal to support victims and help them interact with the relevant legal systems. Even when what they suffer amounts to criminal actions, victims cannot be assumed to know either their rights or how to work the system to protect those rights. Experts in the types of religious freedom violations common in a certain area can publicize their expertise and local presence and seek out individuals and communities who are at risk of victimization. These experts will then be better situated to help guide victims through such intimidating steps as talking to police and serving as witnesses in court. NGOs, churches, and civilians generally can also frequently offer assistance and security to victims.

2. *Assisting defence work*

In other cases, Christians become criminal defendants after being charged with committing crimes like blasphemy and apostasy. In

these cases, religious freedom advocates must highlight the ways in which such 'crimes' are antithetical to international human rights and national constitutional rights (if possible), ensure that the Christian defendants are represented by the best possible defines lawyers, and appeal to the international community to put pressure on governments to drop charges or, where convictions have been made, release prisoners. USCIRF's Religious Prisoners of Conscience Project provides a vehicle for highlighting 'individuals imprisoned for exercising their freedom of religion or belief'¹⁰¹ with the idea that public inattention often leads to more persecution, not freedom.¹⁰² Humanizing the plight of Christian defendants imprisoned for their faith is among the most effective strategies for garnering international attention for both specific cases and the issue of Christian persecution more generally.¹⁰³

The case of Meriam Ibrahim provides an example of international pressure bringing about a Christian prisoner's release. Meriam Ibrahim, a Christian woman raised by her Christian mother, Sudan, was considered a Muslim by the Sudanese government, having been born to a Muslim father. After she married a Christian man, the Sudanese government charged her with apostasy. She was eight months pregnant when she was convicted and sentenced to death.¹⁰⁴ As a result of united pressure from Christians, religious freedom advocates, other human rights groups, and governments, the Sudanese government released her after a horrific eighteen-month period.¹⁰⁵

Civil society groups can assist defence work through many avenues, including by training potential victim defendants on their rights, connecting victim defendants lawyers to ensure they receive quality legal representation, and bringing international attention to certain cases where it has been determined that such attention will not endanger the victim or his lawyer.

B. Civil matters

Many violations of religious freedom are matters of civil law, such as discrimination in the workplace due to a Christian's religious beliefs. Such matters will exist even where religious freedom laws are in place. Thus, it is critical that religious freedom organizations provide legal representation to Christian plaintiffs who are discriminated against or persecuted for their faith. Where possible, lawyers can bring challenges to laws that more directly invite persecution against Christians. Quality legal representation is essential for winning court cases. Such victories not only are capable of bringing an end to the persecution of the people involved, they may set lasting precedent, making it easier for other people to freely practice their faith. For these reasons, it is critical to train lawyers and build networks of lawyers for the purpose of defending religious freedom. Ideally, such networks would span the globe, so that persecuted Christians in every country would be able to find lawyers trained to handle religious freedom cases.

One example of such a network is ADF International's network of allied lawyers. ADF International has built, and continues to expand, a network of thousands of Christian lawyers, based in many different countries around the globe, who have been trained to advocate for religious freedom.¹⁰⁶ These allied lawyers work alongside ADF International and have contributed more than 1 million *pro bono* hours to cases in which Christians' freedom to live out their faith is at stake.¹⁰⁷ In India, for example, allied lawyers have been able to assist churches in responding to mob violence and staying open while being threatened.

Involvement in litigation is essential for combating the persecution of Christians worldwide. Persecuted Christians often end up in the court system as complaining victims, criminal defendants, or civil plaintiffs. In all cases, lawyers, law enforcement, and civil society members must be equipped to come alongside persecuted Christians to ensure that they are aware of their rights and well represented in court.

6) Influencing Culture and Society

Working to improve legislation and enforcement will be insufficient apart from efforts to change cultural attitudes towards religious freedom. As long as religious freedom is not valued, it will not be protected. Therefore, an essential part of the effort to end religious persecution of Christians is working with the Church, educational institutions, and the media to focus attention on the reality of religious persecution and the value of freedom.

A. The Church

There are several strategic actions that the Church can undertake to combat religious persecution. First among these is to create and strengthen ecumenical networks of Christian leaders dedicated to combating persecution of Christians. Churches around the world collectively wield a tremendous amount of influence and power, but coordinated efforts to combat religious persecution is lacking. A major part of the problem is fragmentation. As Catholic journalist Al Kresta puts it,

Besides political indifference and secularization, there is another reason why religious persecution has not arrested the attention of the press or the politicians—the fragmentation of the Christian community. When Baptist missionaries are kidnapped in Peru, major newspapers offer few headlines. The story only resonates within their denominational circles The global forces of Christianity are not mobilized.¹⁰⁸

Church leaders have a wide variety of responsibilities, and specialized organizations such as Open Doors, Barnabas Fund, and Voice of the Martyrs focus on responding to persecution. It is not surprising that many pastors, for example, leave to such specialized organizations the work of coordinating efforts against persecution. But church leaders, ordained and lay, have a critical role to play in bringing attention to persecution

and shaping efforts to combat it. Church leaders can provide regular teaching on religious persecution, coordinate prayer efforts, and collect funds to support religious freedom efforts. Moreover, church leaders can help church members working in politics, law, media, and other fields to leverage influence and expertise. Timothy Shah expresses well the latent strength within the Church:

[W]e cannot subcontract our sense of solidarity with fellow Christians to the government. If we Christians are not on our knees, if we Christians are not mobilizing our parishes, it is a gross hypocrisy to expect our government to do something. If we were to mobilize our churches, if we were to raise awareness, if we were to do teaching in our churches, if we were to insist that our parishes teach about this issue ... we would see these governments acting.¹⁰⁹

Initiative for combating persecution must come from within the Church, and ecumenical networks of Christian leaders can help to ignite and sustain such initiative.

It is also of strategic importance for Christian leaders to engage with leaders of other faith communities to create interfaith networks of leaders dedicated to ending religious persecution. Not merely the persecution of Christians but violations of religious freedom affecting members of all faiths are of concern to the Church. Engaging leaders of other religious communities struggling with persecution can greatly increase the effectiveness of all religious communities' advocacy. Of particular importance are partnerships with Muslim leaders committed to ending religious persecution. Christians are at legal and political disadvantages in many Muslim-majority countries. Muslim religious leaders are therefore specially situated to provide legal and political assistance in specific cases of persecution. Moreover, Muslim leaders in favour of religious freedom will be critical for bringing teachings about religious freedom to the broader population. Examples of such cross-religious efforts have been seen in Sudan, Nigeria, and Kenya,

where Christian leaders have built bridges with Muslim leaders.¹¹⁰ These relationships have led to instances of Christian persecution being thwarted, for example, when these Muslim leaders have hidden and thereby protected Christians from Muslim attackers.¹¹¹ Leadership from high-profile Muslim figures in countries like the UAE or Egypt can create the space for leaders in other Muslim-majority countries, such as in Indonesia and Malaysia, to also argue for religious freedom. Elsewhere in an effort to stifle persecution, Christian leaders in India have 'made extensive efforts to build alliances among churches and with Hindu and Muslim religious leaders, stressing common values and collaboration to provide social services'.¹¹² Until such Muslim and Hindu leaders grow in number and influence, progress toward ending persecution of Christians in the Middle East and South Asia will necessarily be limited. It is of great importance, then, for Christian leaders to identify, engage with, train, and support in whatever ways possible influential Muslims and Hindus opposed to religious persecution.

Interreligious dialogue is frequently promoted at the United Nations, including through a biannual General Assembly resolution on the topic.¹¹³ As Ahmed Shaheed, UN Special Rapporteur for Freedom of Religion or Belief, explains, 'All forms of dialogue can contribute substantially to the question of trust-building and challenging stereotypes.'¹¹⁴ Challenging stereotypes is particularly relevant to both deescalating tensions generally and making partnerships possible because, as Shaheed points out, stereotypes can lead to a 'toxic mix of fear and contempt'.¹¹⁵ In its 2019 report, USCIRF recommended that countries such as the Central African Republic and Saudi Arabia increase interfaith dialogue to begin advancing religious freedom.¹¹⁶ At the same time, the importance of interreligious dialogue ought not be overstated; there is a danger that governments and other actors would focus on interreligious dialogue in place of rather than in support of concrete actions to aid religious minorities. For example, the government of Indonesia has recently 'tended to prioritize interfaith harmony over religious freedom', and, in doing so, has supported policies 'that violate religious freedom, such as the criminalization of blasphemy

and approval process for new houses of worship'.¹¹⁷ In a supposed attempt to foster harmony between religious groups, the government has failed to prioritize the rights of minorities such as Christians. Such attempts at harmony, however, are short-sighted and 'often have the unintended effect of exacerbating interreligious tensions.'¹¹⁸

Finally, the Church can work against persecution by increasing awareness of, prayer for, and funds for persecuted Christians and relief efforts. So long as persecution cannot be fully prevented, part of combating it will be helping victims. Churches can do much to support such efforts, either by directly taking on particular projects or by partnering with NGOs.

B. Education

Winning the cultural battle will almost certainly require engaging educational institutions. Religiously discriminatory textbooks and educational materials in primary and secondary schools need to be rooted out and replaced with books that favour religious freedom.¹¹⁹ For example, primary and secondary school textbooks in Pakistan depict Christians and other religious minorities as 'untrustworthy, religiously inferior, and ideologically scheming and intolerant'.¹²⁰ In addition to removing materials that perpetuate religious persecution, positive materials teaching about the importance of religious freedom must be introduced in schools, universities, and even governments. The government of Laos—a country ranked the 20th most difficult place for Christians to practice their faith freely¹²¹—recently agreed to introduce religious freedom training for government officials.¹²² The trainings, which were run by the Institute for Global Engagement, focused on religious freedom as a human right, current Lao government policy on the issue, and encouraging dialogue between religious and government leaders.¹²³ IGE has had success in working with other very challenging countries in improving religious freedom in recent years, including Vietnam, Uzbekistan, and others.¹²⁴

Also of special importance in the realm of education is the defence of related freedoms, the freedom of speech in particular. Freedom of

speech is under assault in many educational institutions throughout the world. Because intellectual trends influence law, those trends need to change for legislation and enforcement to improve. Training students, young academics, attorneys, and government officials, including judges and lawmakers, can help to bring about such a shift.

Academics can help to bring an end to persecution not only by striving to shift religiously-intolerant cultural beliefs, but also by writing histories of persecution and detailing the implications for Christianity, human rights, and freedom more generally if persecution continues and Christians become extinct in certain parts of the world. Carrying out social science research and publishing writings on these topics will be useful for both media and politicians working on this issue, as they will often give more weight to the findings of respected academics than to those of NGOs.

C. Media

The struggle over ideas about religious persecution will also need to take place in and through the media. There are a variety of voices within the mainstream media friendly to human rights, but appreciation for the centrality of religious freedom is lacking. A former executive editor of the *New York Times* offers a representative testimony:

I realized that in decades of reporting, writing, assigning, stories on human rights, I rarely touched on one of the most important. Political human rights, legal, civil, and press rights, emphatically and often, but the right to worship where and how God or conscience leads, almost never.¹²⁵

Even widely cited organizations such as Human Rights Watch only focus about 2.5 per cent of their reports on religious persecution.¹²⁶ If more media attention is turned toward reporting on the persecution of Christians, that attention will provide momentum for each of the other initiatives against persecution outlined above. Media can do far more than it currently does,

for example, to shame countries whose governments allow for egregious persecution and to draw attention to lower levels of aggression that the general population often overlooks or misunderstands. Religious freedom NGOs, of course, also have a responsibility to reach out to and develop relationships with mainstream media, and communicate in language that they are most likely to understand and be sympathetic to.

While there is a dearth of mainstream media attention on issues related to religious freedom, there are several excellent outlets that focus heavily on freedom of religion. These outlets include Forum 18, which covers Russia and Central Asia; Asia News; World Watch Monitor; among others. Mainstream journalists committed to bringing the persecution of Christians and other religious minorities to light should seek out religious-literacy training, which could be provided by some of these religious-freedom-focused outlets, as well as organizations such as Lapido Media, which train journalists to report on religious issues, including persecution, in the most effective ways.

In addition to drawing attention to the persecution of Christians, media has a large role to play in bringing an end to stereotypes and associations that result in religious persecution. For example, in the Central Asian Republics—Uzbekistan, Turkmenistan, Tajikistan, Kazakhstan, and Kyrgyzstan—Protestants are often synonymous with the West, and therefore proselytizing is often suppressed in an effort to reduce Western influence.¹²⁷

It is equally important for the media to, in certain instances, refrain from drawing attention to persecution. Publicizing certain situations can endanger those being persecuted. Religious freedom training for journalists can help to prevent the publicizing of situations when doing so would lead to harm.

In combating the persecution of Christians worldwide, the role of online tools, including social media platforms, cannot be overlooked. On the one hand, online tools are often abused to instigate persecution and, on the other, they are and must continue to be utilized to combat it through raising awareness and tracking incidents. Monitoring social

media can help to swiftly identify threats posed to Christian communities, because religious minority groups are particularly susceptible to violence instigated by social media. For example, in his most recent report, UN Special Rapporteur Ahmed Shaheed noted that anti-Semitism is on the rise globally and that the internet is one of the most prominent vehicles by which it is spreading.¹²⁸ In countries like Burma, where the government has been accused of carrying out genocide of religious minorities, including Christians, social media posts that incite violence against religious groups have mostly gone unchecked.¹²⁹ Supporting efforts aimed at discouraging social media posts that incite violence against religious groups can be an effective way to curb persecution. Discouraging such posts includes prosecuting those who use social media to incite violence. Doing so can both stop violence before it occurs and deter others from engaging in such misuse of social media.

Social media platforms also provide powerful tools for raising awareness of persecution in areas that do not receive widespread or, sometimes, any traditional media coverage. In India, for example, lawyers have created MapViolence.in, an online tool to report and track the unprecedented increase in incidents of violence and hostility against the Christian minority community. Instances of persecution are routinely publicized and disseminated via social media platforms like Twitter and Facebook. Such tools can provide the necessary information to convince governments and international institutions to take action.

Media, in its many forms, plays a critical role in both spreading and combatting the persecution of Christians worldwide. Advocates engaged in efforts to address persecution must find ways to capitalize on the many positive opportunities afforded by media to effect change.

7) Conclusion

In light of the present international crisis of persecution facing the Church, strategic action is necessary. In particular, concerned parties ought to seek advances in laws protecting religious freedom and related rights, favourable interpretation and consistent enforcement of those laws, and cultural shifts toward a genuine valuation of religious freedom.

Every country and region provide unique circumstances that require a tailored solution to persecution. In Indonesia, for example, two of the largest Islamic political and social movements, the Nahdlatul Ulama and the Muhammadiyah, 'are strong upholders of *Pancasila*, democracy, and a society-wide level of tolerance and religious freedom'.¹³⁰ *Pancasila* is a philosophy imbedded within Indonesia's constitution that allows for the coexistence of six religions, including Protestantism and Catholicism.¹³¹ Therefore, Indonesian Christians committed to bringing about an end to religiously-motivated persecution have worked to build alliances with Muslims who are 'dedicated to preserving *Pancasila*'.¹³² Such alliances were likely instrumental in the election of Basuki Tjahaja Purnama, a Christian and the former governor of Jakarta. Unfortunately, however, Mr. Purnama spent nearly two years in jail for blasphemy—a conviction which was based on his comment that Muslims should not hold his Christian faith against him when they vote.¹³³ Moreover, in some countries, such as Sudan, Christian leaders who have called upon the government to bring an end to the persecution of Christians have suffered reprisals, most often imprisonment.¹³⁴ There is a great need therefore for networks of dedicated activists and experts in every region of the world to implement the strategies discussed here and develop specific versions of these strategies tailored to local circumstances. Ideally, these networks would be in close enough contact to share best practices and collaborate on specific undertakings. These networks are beginning to grow with the recent rapid spread of regional Ministerials and local Roundtables, including in areas in the Middle East, Africa, and South and Southeast Asia.

Despite the present crisis, there is hope for the prospects of religious freedom. International law provides a relatively strong framework for demanding domestic protection of religious freedom. In some regions, improved ease of travel makes exit from regions rife with persecution more possible than ever before. And new technologies allow network-building, information-sharing, and collaboration at a scale and speed previously unimaginable. The global Church has not always done all that it could to stand with those persecuted on the basis of religion, but the Church has often done much, and there is a great deal that can be done now to meet this present moment.



ADF INTERNATIONAL

ADF International is a faith-based legal advocacy organization that protects fundamental freedoms and promotes the inherent dignity of all people. With headquarters in Vienna, and offices in Brussels, Geneva, Strasbourg, London, New York City, and Washington DC, we are at the forefront of defending religious freedom, the sanctity of life, and marriage and family worldwide.

Working on an international level, we have a full-time presence at all the institutions of strategic international importance. We are accredited by the UN Economic and Social Council (ECOSOC), the European Parliament and Commission, and the Organization of American States (OAS). Additionally, we enjoy participatory status with the EU's Agency for Fundamental Rights (FRA) and engage regularly with the Organization for Security and Co-operation in Europe (OSCE). On a national level, we work with local partners to provide training, funding, and legal advocacy.

ADFinternational.org

Endnotes

- ¹ Chris Deliso, *Ecumenical US Conference Highlights Persecution of Christians*, The Tablet (5 Dec. 2017), <http://www.thetablet.co.uk/news/8191/ecumenical-us-conference-highlights-persecution-of-christians->; see also *80% of Religious Discrimination Targets Christians*, World Watch Monitor (7 Dec. 2017), <https://www.worldwatchmonitor.org/coe/80-religious-discrimination-aimed-christians/>.
- ² *In Response to Persecution: Findings of the Under Caesar's Sword Project on Global Christian Communities 7* (Univ. of Notre Dame 2017) [hereinafter *In Response to Persecution*]. This recent report is perhaps the most comprehensive project looking into the situation of persecuted Christians around the world today. Its findings are thus relied upon throughout the entirety of this white paper. More about the report:

Under Caesar's Sword: Christian Response to Persecution is a collaborative global research project that investigates how Christians respond when their religious freedom is severely violated. The project began in September 2014 with the support of a grant of \$1.1 million from The Templeton Religion Trust. It is a partnership of the University of Notre Dame's Center for Ethics and Culture, the Religious Freedom Institute, and Georgetown University's Religious Freedom Research Project. The project involves a team of leading scholars of global Christianity who conducted first-hand research on Christian responses to persecution in some twenty-five countries. Through multiple channels, the project seeks to disseminate the findings of this research in order to raise awareness of Christian responses to persecution and to promote solidarity with those who are persecuted. (page 57 of the report).
- ³ *Id.*
- ⁴ Helene Fisher & Elizabeth Miller, *Gendered Persecution: World Watch List 2018 Analysis and Implication*, Open Doors International (Mar. 2018), <https://www.worldwatchmonitor.org/wp-content/uploads/2018/03/Gendered-persecution-WWL-2018-analysis-and-implications.pdf>; Helene Fisher & Elizabeth Fisher, *Christian Women at Double Risk of Persecution—Because of Gender as well as Religion*, World Watch Monitor (7 Mar. 2018), <https://www.worldwatchmonitor.org/2018/03/christian-women-face-twice-as-many-forms-of-persecution-as-men-for-gender-as-well-as-religion/>.
- ⁵ Pew Research Center, *Global Restrictions on Religion Rise Modestly in 2015, Reversing Downward Trend* (11 Apr. 2017), <http://www.pewforum.org/2017/04/11/global-restrictions-on-religion-rise-modestly-in-2015-reversing-downward-trend/>.
- ⁶ Quoted in Al Kresta, 'Under Caesar's Sword: A Report on the Conference', *Persecution & Genocide of Christians in the Middle East*, 371-72 (Ronald J. Rychlak & Jane F. Adolphs eds., Angelico Press 2017) [Hereinafter Kresta, 'Under Caesar's Sword'].
- ⁷ *In Response to Persecution*, *supra* note 2, at 9.
- ⁸ For example, in several Middle Eastern countries, Christians go to great lengths to appear similar to their Muslim neighbours when in public.
- ⁹ *In Response to Persecution*, *supra* note 2, at 36.
- ¹⁰ *Id.* at 10.
- ¹¹ *Id.*
- ¹² *Id.*
- ¹³ *Id.* at 32.

¹⁴ *Id.*

¹⁵ See H. Knox Thames et al., *International Religious Freedom Advocacy: A Guide to Organizations, Law, And NGOs* 16 (Baylor University Press 2009) [Hereinafter Thames et al., *International Religious Freedom Advocacy*].

¹⁶ *Id.*

¹⁷ P.R. Gandhi, 'Universal Declaration of Human Rights,' Article 18, in *Blackstone's International Human Rights Documents* 12 (Blackstone Press 2010) [Hereinafter Gandhi, 'Universal Declaration on Human Rights'].

¹⁸ *Id.* at 10.

¹⁹ *Id.* at 12.

²⁰ Thames et al., *International Religious Freedom Advocacy*, *supra* note 15, at 16.

²¹ P.R. Gandhi, 'International Covenant on Civil and Political Rights', in *Blackstone's International Human Rights Documents*, *supra* note 31, at 39.

²² However, the ICCPR may undermine the UDHR in one key aspect. The freedom to change one's religion or belief set forth in the UDHR became in the ICCPR the freedom to 'have or to adopt' a religion or belief of one's choice. This alternation was made at the insistence of Saudi Arabia, even though the country has never ratified the treaty. See Thames et al., *International Religious Freedom Advocacy*, *supra* note 15, at 17.

²³ Gandhi, 'Universal Declaration on Human Rights', *supra* note 17, at 44.

²⁴ Such comments are non-binding but do hold persuasive value.

²⁵ See General Comment 22, ¶ 8, Human Rights Council CCPR/C/21/Rev.1/Add.4 (27 Sept. 1993).

²⁶ OHCHR, *Ratification of 18 International Human Rights Treaties*, <http://indicators.ohchr.org/> (last visited 20 Apr. 2018).

²⁷ UN Treaty Collection, *Status of Treaties: Int'l Covenant on Civil and Political Rights*, https://treaties.un.org/Pages/ViewDetails.aspx?src=IND&mtdsg_no=IV-4&chapter=4&clang=en (last visited 20 Apr. 2018).

²⁸ *Id.* The interpretation of human rights as being subject to Islamic sharia is widespread in the Islamic world. Article 24 of the Organisation of Islamic Cooperation's 1990 Cairo Declaration on Human Rights in Islam expressly subjects all rights in the Cairo Declaration to sharia.

²⁹ Gandhi, 'Universal Declaration of Human Rights', *supra* note 17, at 56.

³⁰ *Id.* at 59.

³¹ *Fact Sheet No.2 (Rev.1), The International Bill of Human Rights*, OHCHR, <http://www.ohchr.org/Documents/Publications/FactSheet2Rev.1en.pdf> (last visited 20 Apr. 2018).

³² See the preamble of the ICERD.

³³ Knox Thames, *Mechanisms for Religious Freedom Advocacy*, 4:1 IJRF 116 (2001); see also Int'l Law Comm'n, Rep. on the Work of Its Seventieth Session, UN Doc. A/73/10, at 124 (2018): 'To determine the existence and content of a rule of customary international law, it is necessary to ascertain whether there is a general practice that is accepted as law (*opinio juris*)'.

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- ³⁶ Amnesty Int'l, *Egypt: Drop 'Defamation of Religion' Charges Against TV Presenter*, AI Index: MDE 12/2950/2015 (28 Nov. 2015), <https://www.amnesty.org/en/documents/mde12/2950/2015/en/>.
- ³⁷ US Comm'n on Intl Religious Freedom, *Respecting Rights? Measuring the World's Blasphemy Laws* 5 (2017), <https://www.uscirf.gov/sites/default/files/Blasphemy%20Laws%20Report.pdf>.
- ³⁸ Pamela Constable, *Police in Pakistan Hunt Christian Accused of Blasphemy for Online Poem*, Wash. Post (12 Jul. 2016), https://www.washingtonpost.com/news/worldviews/wp/2016/07/12/police-in-pakistan-hunt-christian-accused-of-blasphemy-for-online-poem/?utm_term=.1a98d8004ddf.
- ³⁹ India and Nigeria are exceptions. India is primarily Hindu. The apostasy laws in India pertain to (1) grounds for divorce, see, e.g., Hindu Marriage Act section 13(1)(ii), and (2) the loss of 'Scheduled Caste' privileges for Dalit converts away from Hinduism, Buddhism, and Sikhism; see Presidential SC/ST Order, 1950. However, there are numerous other laws in India that make conversion from one religion to another difficult as well. Nigeria is roughly divided between Christians and Muslims. In the Muslim regions of Northern Nigeria, sharia law criminalizing apostasy is enforced. See *'Political Sharia? Human Rights and Islamic Law in Northern Nigeria*, Human Rights Watch (21 Sept. 2004), <https://www.hrw.org/report/2004/09/21/political-sharia/human-rights-and-islamic-law-northern-nigeria>.
- ⁴⁰ Pew Research Center, *Blasphemy, Apostasy and Defamation of Religion*, *supra* note 35; Angelina E. Theodorou, *Which Countries Still Outlaw Apostasy and Blasphemy*, Pew Research Center (29 Jul. 2016), <http://www.pewresearch.org/fact-tank/2016/07/29/which-countries-still-outlaw-apostasy-and-blasphemy/> [hereinafter Pew Research Center, *Apostasy and Blasphemy*].
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- ⁴² *In Response to Persecution*, *supra* note 2, at 23.
- ⁴³ *d.*
- ⁴⁴ Pew Research Center, *Apostasy and Blasphemy*, *supra* note 40.
- ⁴⁵ *Id.*
- ⁴⁶ Harriet Sherwood, *Asia Bibi Begins New Life in Canada – But Her Ordeal May Not Be Over*, The Guardian (8 May 2019), <https://www.theguardian.com/world/2019/may/08/asia-bibi-begins-new-life-in-canada-but-her-ordeal-may-not-be-over>.
- ⁴⁷ Felix Corley & John Kinahan, *TURKMENISTAN: Religious Freedom Survey, January 2017*, Forum 18 (6 Jan. 2017), http://forum18.org/archive.php?article_id=2244. Forum 18 has an extensive archive of reports of violations of freedom of religion in Turkmenistan. See *Turkmenistan*, Forum 18, <http://forum18.org/archive.php?country=32>.
- ⁴⁸ *Id.*
- ⁴⁹ *Id.*
- ⁵⁰ See Meghan Grizzle Fischer, *To the Ends of the Earth*, ADF Int'l (forthcoming).
- ⁵¹ While many constitutions in countries that violate religious freedom recognize religious freedom to some degree, they contain serious flaws and broad exceptions to the rule that largely restrict religious freedom and allow courts to interpret religious freedom as permitting, for example, blasphemy and apostasy laws.
- ⁵² *Article 19*:
1. Everyone shall have the right to hold opinions without interference.
 2. Everyone shall have the right to freedom of expression; this right shall include

freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice.

3. The exercise of the rights provided for in paragraph 2 of this article carries with it special duties and responsibilities. It may therefore be subject to certain restrictions, but these shall only be such as are provided by law and are necessary:

(a) For respect of the rights or reputations of others;

(b) For the protection of national security or of public order (*ordre public*), or of public health or morals.

Article 21:

The right of peaceful assembly shall be recognized. No restrictions may be placed on the exercise of this right other than those imposed in conformity with the law and which are necessary in a democratic society in the interests of national security or public safety, public order (*ordre public*), the protection of public health or morals or the protection of the rights and freedoms of others.

Article 22:

1. Everyone shall have the right to freedom of association with others, including the right to form and join trade unions for the protection of his interests.

2. No restrictions may be placed on the exercise of this right other than those which are prescribed by law and which are necessary in a democratic society in the interests of national security or public safety, public order (*ordre public*), the protection of public health or morals or the protection of the rights and freedoms of others. This article shall not prevent the imposition of lawful restrictions on members of the armed forces and of the police in their exercise of this right.

3. Nothing in this article shall authorize States Parties to the International Labour Organisation Convention of 1948 concerning Freedom of Association and Protection of the Right to Organize to take legislative measures which would prejudice, or to apply the law in such a manner as to prejudice, the guarantees provided for in that Convention.

⁵³ *Article 10 - Freedom of thought, conscience and religion:*

1. Everyone has the right to freedom of thought, conscience and religion. This right includes freedom to change religion or belief and freedom, either alone or in community with others and in public or in private, to manifest religion or belief, in worship, teaching, practice and observance.

2. The right to conscientious objection is recognised, in accordance with the national laws governing the exercise of this right.

⁵⁴ Although covering 'serious human rights violations' in general, rather than just religious freedom violations, legislation such as the United States' Global Magnitsky Act and executive action such as Executive Order 13818 are also examples of potentially powerful sanctions regimes. Sanctions under the Global Magnitsky Act and EO 13818 include visa restrictions and asset freezes. The UK and Canada, among others, have passed similar legislation, and the EU is considering a Magnitsky Act-style sanctions regime as well. See European Parliament resolution of 14 March 2019 on a European human rights violations sanctions region, Eur. Parl. Doc. P8_TA-PROV(2019)0215 (2019).

⁵⁵ International Religious Freedom Act, H.R. 2431, 105th Cong. § 405 (1998).

⁵⁶ *Id.*

⁵⁷ Several other countries, including Germany, Denmark, and Taiwan, have created similar offices that focus on international religious freedom in the past few years.

- ⁵⁸ UNHRC, *The 1951 Refugee Convention*, History of the UNHRC, <http://www.unhcr.org/en-us/1951-refugee-convention.html> (last visited 20 Apr. 2018).
- ⁵⁹ See Ruth Igielnik & Jens M. Krogstad, *Where Refugees to the US Come From*, Pew Research Center: FactTank (3 Feb. 2017), <http://www.pewresearch.org/fact-tank/2017/02/03/where-refugees-to-the-u-s-come-from>.
- ⁶⁰ Dale Hurd, *Update: Sweden Tries to 'Starve' Out Christian Asylum Seeker*, CBN News (14 Mar. 2018), <http://www1.cbn.com/cbnnews/world/2018/march/update-sweden-tries-to-starve-out-christian-asylum-seeker>.
- ⁶¹ *Id.*
- ⁶² Elliott Abrams, *The United States Bars Christian, Not Muslim, Refugees from Syria*, Council on Foreign Relations: Pressure Points (9 Sept. 2016), <https://www.cfr.org/blog/united-states-bars-christian-not-muslim-refugees-syria>.
- ⁶³ *Id.*
- ⁶⁴ Phillip Connor & Jens M. Krogstad, *In First Months of Trump Presidency, Christians Account for Growing Share of US Refugee Arrivals*, Pew Research Center: FactTank (12 Jul. 2017), <http://www.pewresearch.org/fact-tank/2017/07/12/in-first-months-of-trump-presidency-christians-account-for-growing-share-of-u-s-refugee-arrivals/>.
- ⁶⁵ Joe Myers, *Foreign Aid: These Countries Are the Most Generous*, World Economic Forum (19 Aug. 2016), <https://www.weforum.org/agenda/2016/08/foreign-aid-these-countries-are-the-most-generous/>.
- ⁶⁶ Nina Shea, *Opinion, Why Are US Aid Policies in Iraq Helping Iran and Hurting Christian and Yazidi Minorities?*, Fox News (3 Oct. 2017), <http://www.foxnews.com/opinion/2017/10/03/why-are-us-aid-policies-in-iraq-helping-iran-and-hurting-christian-and-yazidi-minorities.html>.
- ⁶⁷ *Id.*
- ⁶⁸ Kate Shellnutt, *Pence: US Will Bypass UN and Aid Persecuted Iraqi Christians Directly*, Christianity Today (26 Oct. 2017), <http://www.christianitytoday.com/news/2017/october/pence-us-persecuted-christians-usaid-un.html>.
- ⁶⁹ See Iraq and Syria Genocide Relief and Accountability Act of 2018, Pub. L. 115-300.
- ⁷⁰ See Press Release, Religious Freedom Institute, *Hanging by a Thread: Christians and Other Religious Minorities Are Fading into History on the Nineveh Plains* (11 Jan. 2019), <https://www.religiousfreedominstitute.org/news/press-release-hanging-by-a-thread>.
- ⁷¹ Angelo Stagnaro, *Middle Eastern Christians Propose a Safe Haven in Iraq*, National Catholic Register: Blogs (15 Jul. 2018), <http://www.ncregister.com/blog/astagnaro/middle-eastern-christians-propose-a-safe-haven-in-iraq>.
- ⁷² H.R. Res. 741, 115th Cong. (as passed by House of Representatives, 16 Feb. 2018).
- ⁷³ Baxtiyar Goran, *Christians Face New 'Catastrophe' as Militias Attack Nineveh Plain: Assyrian MP*, Kursistan24 (8 Dec. 2017), <http://www.kurdistan24.net/en/news/5be824a8-c5d9-45a8-98ae-be1a72a1d632>.
- ⁷⁴ Note that New Zealand is currently in the process of doing just this. See Beth Stolicker, *New Zealand to Repeal Blasphemy Law*, Mission Network News (11 Apr. 2018), <https://www.mnnonline.org/news/new-zealand-to-repeal-blasphemy-law/>.
- ⁷⁵ See Constitution of Ireland 1937 amend. 37; Crimes Amendment Act 2019 (NZ).
- ⁷⁶ Kamran Chaudhry, *Sindh Rejects Law Against Forced Conversions, a Big Disappointment for Christians and Hindus*, AsiaNews.it (1 Sept. 2017), <http://www.asianews.it/news-en/Sindh-rejects-law-against-forced-conversions,-a-big-disappointment-for-Christians-and-Hindus-39607.html>.
- ⁷⁷ Open letter from Bijo Francis, Exec. Dir., to Nawaz Sharif, Prime Minister of Pakistan,

Pakistan: Urgent Action Required Against the Forced Conversion of Minority Girls, Asian Human Rights Commission (3 Jan. 2017), <http://www.humanrights.asia/news/ahrc-news/AHRC-OLT-001-2017/>.

⁷⁸ Chaudhry, *supra* note 76.

⁷⁹ *Special Procedures of the Human Rights Council: Introduction*, OHCHR, <http://www.ohchr.org/EN/HRBodies/SP/Pages/Welcomepage.aspx> (last visited 20 Apr. 2018).

⁸⁰ Thames et al., *International Religious Freedom Advocacy*, *supra* note 15, at 34.

⁸¹ *Id.*

⁸² *Special Rapporteur on Freedom of Religion or Belief*, OHCHR, <http://www.ohchr.org/EN/Issues/FreedomReligion/Pages/FreedomReligionIndex.aspx> (last visited 20 Apr. 2018).

⁸³ *Basic Facts About the UPR*, OHCHR, <http://www.ohchr.org/EN/HRBodies/UPR/Pages/BasicFacts.aspx> (last visited 20 Apr. 2018).

⁸⁴ *Statistics of Recommendations*, UPR Info, <http://www.upr-info.org/database/statistics/> (last visited 15 Nov. 2019).

⁸⁵ *Id.*

⁸⁶ Regarding the blasphemy recommendations, four were accepted: two by Pakistan and one by Indonesia—none of which are promising—but the fourth was accepted by Ireland, which has recently repealed its constitutional ban on blasphemy. See Constitution of Ireland 1937 amend. 37.

⁸⁷ Of the recommendations explicitly referencing anti-conversion laws or the occurrences of forced conversions, four of the eight have been accepted: three from Pakistan and one from Nigeria.

⁸⁸ Of the 22 conscientious objection recommendations, six were accepted (two from Uzbekistan and two from Slovakia, one from Estonia, and one from Paraguay).

⁸⁹ See *Database of Recommendations*, UPR Info, <http://www.upr-info.org/database/> (last visited 20 Apr. 2018). None of the three recommendations on proselytizing has been accepted. *Id.*

⁹⁰ *Meeting of the International Contact Group for Freedom of Religion or Belief*, Global Affairs Canada (10 Mar. 2017), <http://www.international.gc.ca/genev/action/ICGFRB.aspx?lang=eng>.

⁹¹ Kresta, 'Under Caesar's Sword', *supra* note 6, at 50.

⁹² Sahar Aziz, *With Democratization Comes More Religious Freedom and Less Terrorism*, ReligiousFreedomInstitute (10 Jul. 2017), <https://www.religiousfreedominstitute.org/cornerstone/2017/7/9/with-democratization-comes-more-religious-freedom-and-less-terrorism>.

⁹³ Brian J. Grim et al, *Is Religious Freedom Good for Business?: A Conceptual and Empirical Analysis*, 10 IJRR (2014), http://www.reljournal.com/articles/article_view.php?id=85.

⁹⁴ International Religious Freedom Act, *supra* note 55, § 202.

⁹⁵ Sanctions should also be brought against foreign government officials who have been responsible for or have directly carried out 'particularly severe violations of religious freedom.' See Immigration and Nationality Act 212 (a)(2)(G).

⁹⁶ It may also be possible to bring civil cases for damages in assault cases or other instances of religiously motivated violence as a private means of combatting impunity.

⁹⁷ International Justice Mission, <https://www.ijm.org/> (last visited 20 Apr. 2018).

- ⁹⁸ *External Evaluation of International Justice Mission's Program to Combat Sex Trafficking of Children in Cambodia, 2004-2014* 57 (International Justice Mission, Dec. 2015), <https://www.ijm.org/sites/default/files/resources/2015%20Evaluation%20of%20IJM%20CSEC%20Program%20in%20Cambodia%20-%20Final%20Report.pdf>.
- ⁹⁹ *Id.*
- ¹⁰⁰ Trainings could be particularly effective in areas like India or Egypt where police are often called in response to mob violence against Christians. Police will often arrest the church members themselves, arguing that they did it for the members' own safety. But they should be trained to arrest the mobs, and especially the organizers and instigators, because otherwise, the mobs and their leaders will feel emboldened to continue their behaviour repeatedly. See, e.g., *Prayers Unanswered: Assessing the Impact of Egypt's 2016 Church Construction Law*, Project on Middle East Democracy, 17-18 (12 Dec. 2018), https://pomed.org/wp-content/uploads/2018/12/CCL_Report_181212_FINAL.pdf.
- ¹⁰¹ USCIRF's Religious Prisoners of Conscience Project, <http://www.uscirf.gov/uscirfs-religious-prisoners-conscience-project> (last visited 20 Apr. 2018).
- ¹⁰² *Id.* See quote from Commissioner Thomas J. Reese.
- ¹⁰³ See US Comm'n on Int'l Religious Freedom, *2018 Annual Report* 1 (Apr. 2018), http://www.uscirf.gov/sites/default/files/USCIRFAnnualReport2018_wlinks.pdf.
- ¹⁰⁴ Meriam Ibrahim & Maeve Shearlaw, *Meriam Ibrahim on her Escape from Death Row – 'The World Gave Me Hope'*, *The Guardian* (2 Feb. 2015), <https://www.theguardian.com/world/2015/feb/02/meriam-ibrahim-pregnant-death-row-sudan-your-questions>.
- ¹⁰⁵ Josie Ensor, *Sudanese Christian Meriam Ibrahim Tells for First Time of Her Ordeal*, *The Telegraph* (16 Sept. 2014), <https://www.telegraph.co.uk/news/worldnews/northamerica/usa/11098535/Sudanese-Christian-Meriam-Ibrahim-tells-for-first-time-of-her-ordeal.html>.
- ¹⁰⁶ *What We Do: Developing Comprehensive Legal Strategies*, ADF International, <https://adfinternational.org/what-we-do/> (Last visited 15 Nov. 2019).
- ¹⁰⁷ *Id.*
- ¹⁰⁸ Kresta, 'Under Caesar's Sword', *supra* note 6, at 369.
- ¹⁰⁹ *Id.*, at 380.
- ¹¹⁰ *In Response to Persecution*, *supra* note 2, at 24.
- ¹¹¹ *Id.*
- ¹¹² *Id.*, at 25.
- ¹¹³ See, for example, G.A. Res. 73/328, Promoting Interreligious and Intercultural Dialogue and Tolerance in Countering Hate Speech (25 Jul. 2019), <https://undocs.org/en/A/RES/73/328>.
- ¹¹⁴ Ahmed Shaheed (Special Rapporteur on Freedom of Religion or Belief), *Interfaith Dialogue as a Means to Address Incitement to Violence Based on Religion or Belief*, 14 Freedom from Fear (2018), <https://doi.org/10.18356/c09045e6-en>.
- ¹¹⁵ *Id.*
- ¹¹⁶ US Comm'n on Int'l Religious Freedom, *2019 Annual Report*, (Apr. 2019), <https://www.uscirf.gov/sites/default/files/2019USCIRFAnnualReport.pdf> [Hereinafter USCIRF, *2019 Annual Report*].
- ¹¹⁷ *Id.*, at 183.
- ¹¹⁸ *Id.*
- ¹¹⁹ The UAE, with the help of the US, held a regional conference on 'Interfaith Tolerance Education to Combat Extremism' that focused on educational materials and textbooks in Abu Dhabi on 24-25 February 2019.

- ¹²⁰ US Comm'n on Int'l Religious Freedom, *Teaching Intolerance in Pakistan: Religious Bias in Public School Textbooks* (2016), <http://www.uscirf.gov/reports-briefs/special-reports/teaching-intolerance-in-pakistan-religious-bias-in-public-school>.
- ¹²¹ Open Doors, *World Watch List 2018: The 50 Countries Where it's Most Dangerous to Follow Jesus* (Jan. 2018), <https://www.opendoorsusa.org/wp-content/uploads/2018/01/WWL2018-BookletNew.pdf>.
- ¹²² *Laos Government Agrees to Religious Freedom Education*, World Watch Monitor (23 Mar. 2018), <https://www.worldwatchmonitor.org/coe/laos-government-agrees-to-religious-freedom-education/>.
- ¹²³ Press Release, Institute for Global Engagement, *IGE Hosts Religious Freedom Seminars in Laos' Vientiane, Champassak, and Bolikhamxay Provinces* (8 Nov. 2018), <https://globalengage.org/updates/view/ige-hosts-religious-freedom-seminars-in-laos-vientiane-champassak-and-bolikhaxay-provinces>.
- ¹²⁴ See *Programs*, Institute for Global Engagement, <https://globalengage.org/programs> (last visited 15 Nov. 2019); see also 'Case Study II—Vietnam' in Thames et al., *International Religious Freedom Advocacy*, *supra* note 15, at 139-146.
- ¹²⁵ Kresta, 'Under Caesar's Sword', *supra* note 6, at 365, quoting A.M. Rosenthal.
- ¹²⁶ *In Response to Persecution*, *supra* note 2, at 7.
- ¹²⁷ *Id.*, at 31.
- ¹²⁸ Ahmed Shaheed (Special Rapporteur on Freedom of Religion or Belief), *Rep. on Combatting Antisemitism to Eliminate Discrimination and Intolerance Based on Religion or Belief*, UN Doc A/74/358 (20 Sept. 2019).
- ¹²⁹ USCIRF, *2019 Annual Report*, *supra* note 116, at 25.
- ¹³⁰ *In Response to Persecution*, *supra* note 2, at 27.
- ¹³¹ *Id.*
- ¹³² *Id.*
- ¹³³ Aria Bendix, *Jakarta's Christian Governor Imprisoned for Blasphemy*, The Atlantic (9 May 2017), <https://www.theatlantic.com/news/archive/2017/05/jakartas-christian-governor-imprisoned-for-blasphemy/525990/>. Mr. Purnama was released on 24 January 2019.
- ¹³⁴ *In Response to Persecution*, *supra* note 2, at 24.