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Bangladesh: Treatment of Religious Minorities

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Bangladesh: Treatment of Religious Minorities

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SUMMARY Bangladesh's Constitution declares secularism as a fundamental principle of the Constitution and Islam as an official state religion. The Constitution protects religious freedom and ensures equal status and equal rights in the practice of the Hindu, Buddhist, Christian, and other religions. Human rights groups, however, have criticized the Bangladeshi government's failure to adequately respond to incidents of social persecution, which has accentuated the problems that minorities face in the country. Past reports from 2013 and 2014 indicate that the government has failed to investigate or attempt to prevent acts of violence against minorities. Though most minority communities have seen their fair share of societal persecution, members of the Hindu minority appear to be particularly vulnerable. More recent reports indicate that the government is trying to be more responsive and the police are actively investigating, arresting, and prosecuting individuals for religious, political, economic, and personally motivated threats and attacks.

Though recently the government is trying to implement a law that seeks to provide redress to Hindus who had their lands confiscated in the past, the government appears to be still struggling to implement it effectively.

I. Background & Demographics

According to the US State Department's *International Religious Freedom Report for 2014* (IRF Report), which cites a 2011 census, "Sunni Muslims constitute 90 percent and Hindus make up 9.5 percent of the total population (about 95 percent of the religious minority population)."¹ The rest of the population is mainly made up of "Christian (mostly Roman Catholic) and Theravada-Hinayana Buddhist."² According to the report, "[t]here also are small numbers of Shia Muslims, Bahais, animists, and Ahmadiyya Muslims. Estimates vary from a few thousand to 100,000 adherents in each group."³ According to the *CIA World Factbook*, which provides estimates from 2013, religious demographics of the country consist of Muslims (89.1%); Hindus (10%); and other (0.9%), which include Buddhists and Christian.⁴ The 2014 IRF Report also mentions that

* This report was prepared with the assistance of Law Library intern Sahar Saqib.

¹ U.S. DEPARTMENT OF STATE, BUREAU OF DEMOCRACY, HUMAN RIGHTS AND LABOR, INTERNATIONAL RELIGIOUS FREEDOM REPORT FOR 2014: BANGLADESH § I. Religious Demography (Oct. 14, 2015), <http://www.state.gov/j/drl/rls/irf/religiousfreedom/index.htm?year=2014&dliid=238490#wrapper>, archived at <http://www.state.gov/j/drl/rls/irf/religiousfreedom/index.htm?year=2014&dliid=238490>.

² *Id.*

³ *Id.*

⁴ *The World Factbook: Bangladesh*, CENTRAL INTELLIGENCE AGENCY, <https://www.cia.gov/library/publications/the-world-factbook/geos/bg.html> (last updated July 12, 2016), archived at <https://perma.cc/B6WW-57ZJ>.

[e]thnic and religious minority groups often overlap, and are concentrated in the Chittagong Hill Tracts (CHT) and northern districts. Buddhists are predominantly found among the indigenous (non-Bengali) populations of the CHT. Bengali and ethnic minority Christians live in communities across the country, with relatively high concentrations in Barisal City, Gournadi in Barisal district, Baniarchar in Gopalganj, Monipuripara and Christianpara in Dhaka, Nagori in Gazipur, and Khulna City. The largest noncitizen population, the Rohingya, practices Islam. There are approximately 32,000 registered Rohingya refugees from Burma and between 200,000 and 500,000 unregistered Rohingya from Burma practicing Islam in the southeast around Cox's Bazar.⁵

II. Legal Framework

A. Constitutional Provisions

The legal system of Bangladesh is based on English common law, with a written Constitution. A constitutional amendment⁶ was passed in 2011, which was said to have restored “the secular nature of the state while also confirming Islam as the official religion.”⁷

The preamble of the Constitution of the People's Republic of Bangladesh declares that secularism is a fundamental principle of the Constitution.⁸ Article 2-A of the Constitution stipulates that “[t]he state religion of the Republic is Islam, but the State shall ensure equal status and equal right in the practice of the Hindu, Buddhist, Christian and other religions.”⁹ In March 2016, the Supreme Court rejected a petition challenging the insertion of Islam as a state religion in article 2-A.¹⁰ A similar petition was rejected in September 2015.¹¹

Under article 8(2) secularism is listed as a one of the fundamental principles of state policy, which are to be “fundamental to the governance of Bangladesh” and “shall be applied by the State in the making of laws, shall be a guide to the interpretation of the Constitution and of the

⁵ U.S. DEPARTMENT OF STATE, *supra* note 1.

⁶ Constitution of Bangladesh (Fifteenth Amendment) Act, 2011, available in the Chancery Law Chronicles database, at <http://www.ccbd.org/document/834.html> (in Bengali; click “Download”), archived at <https://perma.cc/DVB5-FT4U>.

⁷ *Freedom in the World 2016: Bangladesh*, FREEDOM HOUSE (2016), <https://freedomhouse.org/report/freedom-world/2016/bangladesh>, archived at <https://perma.cc/Q59D-E8NB>.

⁸ CONSTITUTION OF THE PEOPLE'S REPUBLIC OF BANGLADESH (CONSTITUTION) Preamble, http://bdlaws.minlaw.gov.bd/pdf_part.php?id=367, archived at <https://perma.cc/MCQ3-R4WT>.

⁹ *Id.* art. 2-A.

¹⁰ Maher Sattar, *A Revived Challenge to Islam as Bangladesh's State Religion Goes to Court*, N.Y. TIMES (Mar. 25, 2016), http://www.nytimes.com/2016/03/26/world/asia/a-revived-challenge-to-islam-as-bangladeshs-state-religion-goes-to-court.html?_r=0; Syed Zain Al-Mahmood, *Bangladesh Court Rejects Challenge to Islam as State Religion*, WALL STREET J. (Mar. 28, 2016), <http://www.wsj.com/articles/bangladesh-court-rejects-challenge-to-islam-as-state-religion-1459166329>.

¹¹ *Bangladesh Court Rejects Petition Challenging Islam as State Religion*, DAILY STAR (Sept. 8, 2015), <http://www.thedailystar.net/frontpage/hc-rejects-petition-state-religion-139621>, archived at <https://perma.cc/2THL-L2FK>.

other laws of Bangladesh, and shall form the basis of the work of the State and of its citizens.”¹² Fundamental principles of state policy, however, are not judicially enforceable. Article 12 stipulates as follows:

- The principle of secularism shall be realised by the elimination of –
- (a) communalism in all its forms;
 - (b) the granting by the State of political status in favour of any religion;
 - (c) the abuse of religion for political purposes;
 - (d) any discrimination against, or persecution of, persons practicing a particular religion.¹³

Certain fundamental rights that relate to religious freedom are also enshrined in the Constitution. The Constitution protects against discrimination on the grounds of religion.¹⁴ The Constitution also guarantees as a fundamental right for every citizen the right to profess, practice, or propagate any religion and for every religious community or denomination to have the right to establish, maintain, and manage its religious institutions.¹⁵ The right to freedom of association¹⁶ under the Constitution is also subject to certain exclusions, which stipulate that no person shall have the right to form or be a member of the said association or union, if

- (a) it is formed for the purposes of destroying the religious, social and communal harmony among the citizens;
- (b) it is formed for the purposes of creating discrimination among the citizens, on the ground of religion, race, caste, sex, place of birth or language;
- (c) it is formed for the purposes of organizing terrorist acts or militant activities against the State or the citizens or any other country[.]¹⁷

B. Criminal Law

Chapter XV of Bangladesh’s Penal Code¹⁸ contains offenses related to religion, which prohibit “[d]eliberate and malicious acts intended to outrage religious feelings of any class by insulting its religion or religious beliefs”¹⁹ and “[u]ttering words, etc, with deliberate intent to wound religious feelings.”²⁰ These are punished with fines, up to two years in prison, or both.²¹

¹² CONSTITUTION art. 8(2).

¹³ *Id.* art. 12.

¹⁴ *Id.* art. 28(1).

¹⁵ *Id.* art. 41.

¹⁶ *Id.* art. 38.

¹⁷ *Id.* art. 38(a)–(c).

¹⁸ PENAL CODE, 1860, Act No. XLV of 1860, http://bdlaws.minlaw.gov.bd/print_sections_all.php?id=11, archived at <https://perma.cc/F6PU-X8Q4>.

¹⁹ *Id.* § 295A.

²⁰ *Id.*

²¹ *Id.*

C. Family Law

In Bangladesh, family law matters, including marriage, divorce, maintenance, guardianship, custody, adoption, and inheritance, are predominantly regulated by the personal status laws as dictated by the religion of the persons concerned.²² There is no separate personal status law for Buddhists; they fall under the Hindu law.

The majority Muslim population is governed by Muslim personal status laws that are predominantly based on the Hanafi school of thought. Under all Sunni schools of Islamic law, including the Hanafi school, a Muslim male is permitted to contract a valid marriage not only with a Muslim woman, but also with a *Kitabi* (or scripturalist), meaning a member of the Christian or Jewish religions.²³ Marriages to polytheists and idol or fire worshipers are not considered valid. Moreover, a Muslim woman cannot contract a valid marriage except with a Muslim. She is not permitted to contract a valid marriage even with a *Kitabi*, that is, a Christian or a Jew.²⁴

Interfaith marriages do not appear to be favored under Hindu law, which governs Bangladesh's sizable Hindu population.²⁵

An interfaith marriage between a Muslim man and a Hindu woman, and between a Muslim woman and a non-Muslim man is lawful under the Special Marriage Act of 1872,²⁶ but only if the parties renounce their respective religions through a declaration prior to solemnization of the marriage.²⁷ This rule applies to other religious faiths as well, unless the persons profess the Hindu, Buddhist, Sikh, or Jain religions.²⁸

III. Government Treatment of Religious Minorities

According to the State Department's 2014 IRF Report, the Bangladeshi government's failure to adequately respond to incidents of social persecution has accentuated the problems that minorities face in the country. The report notes that the government has failed to investigate or

²² AUSTRALIAN GOVERNMENT, REFUGEE REVIEW TRIBUNAL, MRT RESEARCH RESPONSE No. BGD17626, Question 1 (Nov. 11, 2005), available at <http://www.refworld.org/pdfid/4b6fe1250.pdf>, archived at <https://perma.cc/X55Z-PTX5>.

²³ Mohammad Moin Uddin, *Inter-religious Marriage in Bangladesh: An Analysis of the Existing Legal Framework*, XIII CHITTAGONG UNIV. J.L. 117, 123 (2008).

²⁴ *Id.* at 129.

²⁵ *Id.* at 120.

²⁶ Special Marriage Act, No. 3 of 1872, http://bdlaws.minlaw.gov.bd/print_sections_all.php?id=25, archived at <https://perma.cc/Y67W-PLJE>.

²⁷ *Id.* § 10; see also AUSTRALIAN GOVERNMENT, *supra* note 22.

²⁸ Section 2 of the Special Marriage Act stipulates as follows:

Marriages may be celebrated under this Act between persons neither of whom professes the Christian or the Jewish, or the Hindu or the Muslim or the Parsi or the Buddhist, or the Sikh or the Jaina religion, or between persons each of whom professes one or other of the following religions, that is to say, the Hindu, Buddhist, Sikh or Jaina religion [under specified] conditions

attempt to prevent acts of violence against minorities. The report also noted incidents of the government placing limits and restrictions on religious speech.²⁹ When asked, religious minority leaders state that it is frequently individuals from both ruling and opposition political parties that initiate the violence against them as part of a political agenda.³⁰

More recently, in response to a wave of attacks on minorities and secular and liberal figures, the government began a “nationwide crackdown” in the first week of June 2016, with arrests of around 8,000 people, including 119 suspected Islamist militants.³¹ Prime Minister Sheikh Hasina is reported to have said that, “[o]ur forces will hunt them out and bring them to justice. Those who are sponsoring these ghastly attacks will also not be spared. Violence against the minorities and others will be curbed.”³² However, minorities appear to be losing hope, with the general secretary of the Bangladesh Hindu Buddhist Christian Unity Council stating that,

[t]he sudden acceleration in the murderous attacks shows that the killers are taking advantage of the situation of impunity prevailing in the country. . . . The pattern of machete attacks show the killers are among those Islamists who want to cleanse the country of all non-Muslims and even liberal Muslims. The government has clearly failed to provide security to the minorities. The situation is alarming.³³

According to the US Commission on Religious Freedom’s (USCIRF’s) 2016 report there appears to be an improving situation with regard to the governmental response to violence and social persecution of minorities:

On a positive note, religious minority communities reported that the government and police actively have investigated, arrested, and prosecuted individuals for threats and attacks, and have increased protection, especially during religious holidays and festivals. Religious leaders also noted that Prime Minister Sheikh Hasina and BNP [Bangladesh Nationalist Party] Chairperson Khaleda Zia, and religious leaders, including from the Sunni majority, have made public statements condemning attacks against religious minorities. However, religious communities also report that political parties sometimes use religiously-divisive language and act in ways that exacerbate religious and communal tensions for political gain.³⁴

A risk assessment of country-of-origin information (COI) by the UK Home Office states that

²⁹ U.S. DEPARTMENT OF STATE, *supra* note 1.

³⁰ *Id.*

³¹ Akhtar Ali, *Brutal Killings Target Bangladesh Religious Minorities*, USA TODAY (June 13, 2016), <http://www.usatoday.com/story/news/world/2016/06/13/brutal-killings-target-bangladesh-religious-minorities/85842236>, archived at <https://perma.cc/5SD6-Z8KE>.

³² *Id.*

³³ *Id.*

³⁴ *Bangladesh*, in UNITED STATES COMMISSION ON RELIGIOUS FREEDOM (USCIRF), 2016 ANNUAL REPORT 209 (Apr. 2016), http://www.uscirtf.gov/sites/default/files/USCIRF_Monitored_Bangladesh.pdf, archived at <https://perma.cc/DQ9G-KZJM>.

Bangladesh is a secular, pluralistic parliamentary democracy; the constitution and other laws protect religious freedom and ensure equal status and equal rights in the practice of the Hindu, Buddhist, Christian and other religions. This is generally respected by the government and there is no indication that the state actively engages in persecuting people on account of their religion. However, political parties do use religiously divisive language and, on occasion, act in ways that exacerbate rather than diminish religious and communal tensions. Violent assaults on religious minority communities are often not investigated or prosecuted.³⁵

Freedom House notes that “[r]eligious minorities remain underrepresented in politics and state agencies, though the [secularist] AL [Awami League] government has appointed several members of such groups to leadership positions.”³⁶ Human rights groups have contended that some political parties try to reduce the influence of religious minorities in elections by creating obstacles for members of minority communities from voting.³⁷

A. Government Interference in Conversions

The government also appears to discourage proselytization and religious conversion. Those who wish to convert to another religion sometimes face strong opposition from the government. Some human rights organizations have even reported sporadic arrests of religious minorities suspected of being involved in assisting others to convert. According to the State Department’s 2014 IRF Report, about thirty persons, among them two pastors, were arrested by police in Lalmonirhat District in November 2014 for what appeared to some to be a conversion.³⁸

When it comes to conversions from Islam, local authorities and communities generally object to such efforts.³⁹ In February of 2014, local leaders reported some child sponsorship centers as being involved in converting Muslim children to Christianity, which prompted the Nongovernmental Organization (NGO) Affairs Bureau to close down sixty-four offices of the international NGO, Compassion International.⁴⁰ A few months later, the government allowed the centers to reopen.⁴¹ According to preliminary findings of a country visit by Heiner Bielefeldt, UN Special Rapporteur on freedom of religion or belief,

[t]he Government appears to pursue a policy of discouraging missionary activities, with a view of avoiding religious conflicts which otherwise might arise. As a consequence, the

³⁵ HOME OFFICE, COUNTRY INFORMATION AND GUIDANCE, BANGLADESH: MINORITY RELIGIOUS GROUPS § 2.2.1 (Mar. 2016), https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/514400/CIG.Bangladesh_-_Minority_religious_groups.v1.0.pdf, archived at <https://perma.cc/X39F-NCLJ>.

³⁶ *Freedom in the World 2015: Bangladesh*, FREEDOM HOUSE (2015), <https://freedomhouse.org/report/freedom-world/2015/bangladesh>, archived at <https://perma.cc/QC37-SA5V>.

³⁷ U.S. DEPARTMENT OF STATE, *supra* note 1.

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ *Id.*

⁴¹ *Id.*

issuance of visa for international co-religionists has reportedly been rather restrictive, possibly out of fear that these people could engage in unwelcome missionary activities. Religious minority communities have deplored the fact that inviting fellow believers from abroad can become quite difficult, which also may infringe upon their freedom of religion or belief. Members of Christian communities told they feel exposed to unfounded suspicion that they would engage in systematic proselytism.⁴²

B. Vested Property Act (1974) and Vested Property Return Act (2011)

After war broke out between Pakistan and India in 1965, the government of Pakistan enacted the Enemy Property Act (EPA), which allowed the government to seize and appropriate property that was deemed to belong to “‘enemies’ of the state.”⁴³ According to one report, the law “was used as an expedient mechanism to appropriate land belonging to Hindus that had temporarily fled to India in fear of their lives, or those that never left East Bengal, but were accused of supporting India during the War and labeled as ‘enemies’ of Pakistan.”⁴⁴

After Bangladesh’s independence, the law was retained as the Vested Property Act (VPA), and the government continued to use the law appropriate Hindu-owned land. According to Heiner Bielefeldt, “[i]n reality much of the confiscations carried out amounted to sheer land grabbing,”⁴⁵ which “caused many Hindu families to emigrate to India and other countries.”⁴⁶

Human rights groups and civil society activists in Bangladesh have pressed successive governments to repeal the law.⁴⁷ In 2001, the Vested Properties Return Act was enacted to repeal the VPA and return seized property, but the Act was never properly and fully implemented.⁴⁸ The Act mandated that the government “prepare and publish the district wise list of Returnable Vested Properties through gazette notification within 180 days after the

⁴² Press Release, Office of the United Nations High Commissioner for Human Rights (OHCHR), Preliminary Findings of Country Visit to Bangladesh by Heiner Bielefeldt, Special Rapporteur on Freedom of Religion or Belief (Sept. 9, 2015), <http://www.ohchr.org/en/NewsEvents/Pages/DisplayNews.aspx?NewsID=16399&LangID=E>, archived at <https://perma.cc/LXG7-93HY>.

⁴³ SAMIR KALRA & ARVIND CHANDRAKANTAN, A LEGAL ANALYSIS OF THE ENEMY PROPERTY ACT OF BANGLADESH 1 (Hindu American Foundation), http://www.hafsite.org/sites/default/files/Legal_Analysis_Enemy_Property_Act_Bangladesh.pdf (last visited Aug. 3, 2016), archived at <https://perma.cc/AY73-F2UR>.

⁴⁴ *Id.* at 3–4

⁴⁵ OHCHR, *supra* note 42.

⁴⁶ *Id.*

⁴⁷ Anbarasan Ethirajan, *Bangladesh Approves Hindu Property Restoration Act*, BBC NEWS (Nov. 28, 2011), <http://www.bbc.com/news/world-asia-15928541>, archived at <https://perma.cc/A3K8-K6FX>.

⁴⁸ *Vested Properties Return (Amendment) Bill 2011 Passed by Bangladeshi Parliament*, EQUAL RIGHTS TRUST, <http://www.equalrightstrust.org/news/vested-properties-return-amendment-bill-2011-passed-bangladeshi-parliament> (last visited Aug. 3, 2016), archived at <https://perma.cc/K65W-F8DP>.

enactment,⁴⁹ but a subsequent government removed the time limit. In 2011, an implementing law was enacted,⁵⁰ but the government appears to be still struggling to implement it effectively.⁵¹

Since many of the properties were confiscated more than forty years ago, experts say it might be impossible to return all of them, and it appears that most confiscated properties have been taken over by Muslims linked to major political parties.⁵² The Vested Property Return Act enables Hindus to reclaim their seized property from the government and political individuals.⁵³ However, Hindu communities and NGOs complain that the application process under the Act, which they assert is too narrowly defined to begin with, is very cumbersome and that only a small percentage of eligible properties have been returned.⁵⁴ Moreover, the Office of the United Nations High Commissioner for Human Rights (OHCHR) asserts that compensation of lost properties has “reportedly been inadequate in numerous cases.”⁵⁵

According to the State Department’s 2014 IRF Report, of the more than one million VPA cases pending before the courts involving approximately 2.6 million acres of land seized from Hindus, no property has been returned by the government to date, despite the passage of the VPRA five years ago⁵⁶ and an electoral promise made in 2008 by the governing Awami League to return confiscated properties to their original owners.⁵⁷

Reportedly, in May 2015, an additional 6,000 acres of land were eligible for return once the Act was amended to include this land, and the government is reportedly also considering adding more amendments to “address concerns about the application process and the number of eligible properties for return.”⁵⁸

As noted by the UN Special Rapporteur on freedom of religion or belief, “[a]lthough clearly acknowledging positive efforts made by the Government, people from the Hindu community expressed much bitterness about the loss of personal and religious property and the stagnation in restitution measures.”⁵⁹

⁴⁹ Imtiaz Ahmed Sajal, *From Enemy Property to Vested Property: Fifty Years of Public Sufferings*, BANGLADESH LAW DIGEST (Dec. 29, 2015), <http://www.bdlawdigest.org/from-enemy-property-to-vested-property-fifty-years-of-public-sufferings>, archived at <https://perma.cc/PT3D-QUHT>.

⁵⁰ *Id.*

⁵¹ *Id.*

⁵² Ethirajan, *supra* note 47.

⁵³ *Id.*

⁵⁴ *Bangladesh*, in USCIRF, 2015 ANNUAL REPORT 193 (Apr. 30, 2015), <http://www.uscifr.gov/sites/default/files/Bangladesh%202015.pdf>, archived at <https://perma.cc/3PQM-BH2L>.

⁵⁵ OHCHR, *supra* note 42.

⁵⁶ U.S. DEPARTMENT OF STATE, *supra* note 1.

⁵⁷ Ethirajan, *supra* note 45.

⁵⁸ USCIRF, *supra* note 34, at 210.

⁵⁹ OHCHR, *supra* note 42.

C. Chittagong Hill Tracts Peace Accord

The Chittagong Hill Tracts Peace Accord (CHT Accord) is a peace treaty and political agreement signed on December 2, 1997, between the government of Bangladesh and the Parbattya Chattagram Jana Samhati Samiti (PCJSS), which “ended a long-standing armed conflict between the Bangladesh Army and the tribal people of the Chittagong Hill Tracts in the south-eastern region of Bangladesh.”⁶⁰ According to USCIRF, the above political party represents nearly 50% of Theravada Buddhists and indigenous peoples of the area.⁶¹

The 2016 USCIRF report indicates that the Bangladeshi government⁶² claims only forty-eight out of the seventy-two articles of the CHT Accord have been fully implemented, with fifteen having been partially implemented and nine articles having yet to be implemented at all. However, those individuals who represent the area claim that only twenty-five articles have been fully implemented.

In February 2016, Prime Minister Sheikh Hasina said that most of the provisions had been implemented but one of the leaders of a political party that represents the people and indigenous tribes of the Chittagong Hill Tracts disputed this claim. One of the key issues for implementation is the dispute over land ownership.⁶³

The USCIRF notes that although the government has made some progress in complying with the peace accord, the use of religiously-divisive language by the ruling Awami League and other political parties does, on occasion, act in a way that exacerbates rather than diminishes religious and communal tensions.⁶⁴

D. 2014 Parliamentary Elections

The January 5, 2014, parliamentary elections in Bangladesh have been criticized as lacking in fairness and credibility, “result[ing] in more than half of the seats being uncontested.”⁶⁵ The election was boycotted by the main opposition party, the Bangladesh Nationalist Party (BNP), and eighteen other political parties.⁶⁶ Leading up to and following the election, hundreds of homes and shops owned by the Hindu community were vandalized and attacked.⁶⁷ In the run-up

⁶⁰ Hela Uddin Ahmed et al., *The Chittagong Hill Tracts Peace Accord in Bangladesh: An Overview*, 4(4) MEDITERRANEAN J. SOC. SCI. 4, 123 (Mar. 2013), <http://www.mcser.org/journal/index.php/mjss/article/download/14/12>, archived at <https://perma.cc/454T-63Q3>.

⁶¹ USCIRF, *supra* note 34.

⁶² Bangladesh reported these figures to the USCIRF in 2015. *Id.*

⁶³ *A Burning Issue in Bangladesh: How to Bring Peace to the Chittagong Hill Tracts?*, INSIGHT ON CONFLICT (May 6, 2016), <https://www.insightonconflict.org/blog/2016/05/how-to-bring-peace-to-the-chittagong-hill-tracts>, archived at <https://perma.cc/C57T-2FK6>.

⁶⁴ USCIRF, *supra* note 34.

⁶⁵ *Id.*

⁶⁶ *Id.*

⁶⁷ For detailed accounts of attacks on minorities during the election period, see HUMAN RIGHTS WATCH, DEMOCRACY IN THE CROSSFIRE: OPPOSITION VIOLENCE AND GOVERNMENT ABUSES IN THE 2014 PRE- AND POST-

to the election “more than two dozen members of the Hindu minority were killed and many more injured in what officials described as a coordinated campaign”⁶⁸ by Jamaat-Islami, the largest Islamist political party in Bangladesh.

According to the USCIRF,

[p]ost-election violence occurred in 16 out of 64 districts in Bangladesh, with most attacks attributed to individuals and groups associated with the BNP and the main religious party Jamaat-e-Islami (Jamaat). The worst attacks occurred in minority-dominated villages. Dozens of Hindu properties were looted, vandalized, or set ablaze, and hundreds of Hindus fled their homes. Christian and Buddhist communities also were targeted.⁶⁹

Though public statements in support of religious minority communities were made by Prime Minister Sheikh Hasina after the violence,⁷⁰ some news reports indicated that the police and security forces dispatched to affected areas were not able to control the violence and in some cases may have even instigated or participated in it.⁷¹

E. Government Censorship

According to the State Department’s 2014 IRF Report, the government censored media content that was deemed offensive for religious reasons, resulting in the banning of an issue of the journal *Anannya* because of an article written by a teacher at the Sylhet Government Women’s College, which some officials considered insulting to a Hindu goddess.⁷²

Human Rights Watch has criticized the government for promoting “self-censorship” as a way to silence secular bloggers and social activists who question religious beliefs and advocate secularism.⁷³ The Inspector General of Police warned bloggers to desist from “hurting religious sentiments” and said that to do so is a “crime according to our law.”⁷⁴ Brad Adams, Asia Director of Human Rights Watch, criticized the government’s stance in a statement, saying “[t]he government should recall that its duty is to uphold the Constitution and protect people’s lives, as well as their religious freedom.”⁷⁵ According to Heiner Bielefeldt, UN Special

ELECTION PERIOD IN BANGLADESH (2014), https://www.hrw.org/sites/default/files/reports/bangladesh0414_ForUpload.pdf, archived at <https://perma.cc/2AR2-OEBC>.

⁶⁸ FREEDOM HOUSE, *supra* note 36.

⁶⁹ USCIRF, *supra* note 54, at 193.

⁷⁰ *Id.*; See also Mohammad Jamil Khan, *Police Fail to Protect Minorities*, DHAKA TRIBUNE (Jan. 13, 2014), <http://www.dhaka.tribune.com/law-amp-rights/2014/jan/13/police-fail-protect-minorities>, archived at <https://perma.cc/S3WN-LJDL>.

⁷¹ U.S. DEPARTMENT OF STATE, *supra* note 1.

⁷² *Id.*

⁷³ *Bangladesh: Stop Promoting Self-Censorship*, HUMAN RIGHTS WATCH (Aug. 11, 2015), <https://www.hrw.org/news/2015/08/11/bangladesh-stop-promoting-self-censorship>, archived at <https://perma.cc/L83D-9SSD>.

⁷⁴ *Id.*

⁷⁵ *Id.*

Rapporteur on freedom of religion or belief, this is another example of how the government compromises on the principle of secularism:

Similar ambiguities have occurred in statements concerning the recent murders of online activists and the death threats that people engaged in such activities have received. While condemning these threats and acts of violence committed in the name of religion, Government representatives at the same time publicly admonished online activists who have expressed critical views on religion, in particular Islam, not to go "too far" in their criticism without specifying what precisely this cryptic warning is supposed to mean, thereby sending ambiguous messages to the society.⁷⁶

Bangladesh's Prime Minister Sheikh Hasina had promised action against bloggers for "hurting people's religious sentiments"⁷⁷ but had also promised speedy investigation of blogger murders. Human Rights Watch reports that her government had also previously targeted free speech, threatened or prosecuted contempt-of-court cases against journalists and civil society activists, censored media channels that criticized the government, and arrested human rights defenders who criticized violations by security forces.⁷⁸

F. Government's Progressive Efforts with Religious Minorities

In an effort to create peace among religious minorities, President Abdul Hamid hosted receptions to commemorate each of the principal Muslim, Hindu, Buddhist, and Christian holidays in 2015.⁷⁹ The Ministry of Religious Affairs administered four funds for religious and cultural activities as well as literacy and religious programs, festivals, religious building repair, and aid to destitute families.⁸⁰ The funds were the Islamic Foundation, the Hindu Welfare Trust, the Christian Religious Welfare Trust, and the Buddhist Welfare Trust.⁸¹

IV. Societal Treatment of Religious Minorities

According to a Freedom House report from 2015, religious minorities "face societal discrimination as well as harassment" in Bangladesh, and "[m]inority groups and their houses of worship are occasionally the targets of violent attacks."⁸² The 2016 USCIRF report states that,

[d]uring the reporting period, religious minority leaders and laity from the Christian, Shi'a Muslim, Hindu, and Buddhist communities were killed, injured, or threatened, and some houses of worship were attacked. These incidents were either attributed to or claimed by domestic and international extremist groups, including Jamaatul Mujahedin

⁷⁶ OHCHR, *supra* note 42.

⁷⁷ HUMAN RIGHTS WATCH, *supra* note 73.

⁷⁸ *Id.*

⁷⁹ U.S. DEPARTMENT OF STATE, *supra* note 1.

⁸⁰ *Id.*

⁸¹ *Id.*

⁸² FREEDOM HOUSE, *supra* note 7.

Bangladesh (JMB) and the Islamic State of Iraq and the Levant (ISIL), although the government of Bangladesh denies that ISIL is present and operating in the country.⁸³

The State Department’s 2014 IRF Report notes “[r]eligious freedom organizations said it was often difficult to determine to what extent the attacks were motivated by religious animosity or by criminal intent, personal conflict, property disputes, political concerns, or a combination of these factors.”⁸⁴ The report also notes that minority religious groups often have the “least recourse to political means” and belong to a comparatively lower socioeconomic status, which limits their ability to redress wrongs done to them.⁸⁵ The most frequent abuses were looting and destruction of religious sites and homes.⁸⁶

In 2015, the UN Special Rapporteur on freedom of religion or belief noted in preliminary findings that

[s]ome of the violent incidents, which occurred over the past years, have caused feelings of insecurity especially among minority communities, civil society organizations and individuals expressing critical opinions.

. . . .

Many members of religious minorities, who shared their experiences, remember such acts of violence committed against their communities, including lootings, vandalism, torching of houses of worship and even killings. I heard frustration about inadequate reactions of police and judiciary, which has created a climate of impunity.⁸⁷

The Home Office COI report notes that “[i]nstances of societal discrimination, harassment, intimidation and occasional violence against religious minority communities persist although many government and civil society leaders claim these acts have political or economic motivations and should not be attributed wholly to religious beliefs or affiliations”⁸⁸

A. Hindus

The Hindu community in Bangladesh appears to face societal persecution, discrimination, and mistreatment on a fairly regular basis. The Hindu population has also seen significant declines. In 2015 the UN Special Rapporteur on freedom of religion or belief noted that

[m]ost salient is the declining number of Hindus in the country. Whereas at the time of Bangladesh’s independence in 1971, the percentage of the Hindu population amounted to approximately 23 percent of the country’s entire population, current estimates see the Hindus near 8 percent. Apparently, this drastic decline has much to do with contested property issues, which the Government has been trying to resolve . . . as well the

⁸³ USCIRF, *supra* note 32, at 1.

⁸⁴ *Id.*

⁸⁵ *Id.*

⁸⁶ *Id.*

⁸⁷ OHCHR, *supra* note 42.

⁸⁸ HOME OFFICE, *supra* note 35.

experience of general vulnerability through harassment and at times even physical attacks.⁸⁹

The State Department's 2014 IRF Report details the following incidents of persecution against the Hindu community:

- The homes of Hindus in Baghsitarampur Village in the Homma Sub-district of Comilla were attacked by Muslim community members on April 27, 2014.⁹⁰ A Muslim teacher created a Facebook account for a Hindu teacher with whom locals said he had a twelve-year grudge.⁹¹ Once the account was set up, the Muslim teacher allegedly posted a derogatory comment about the Prophet Mohammad on the Hindu teacher's timeline.⁹² The Muslim teacher mobilized approximately a thousand people, including six hundred youths, for the attack on the Hindu teacher, despite efforts by senior members of the village organizing a community meeting to diffuse tensions.⁹³ Some Hindus had been warned by their Muslim community members about the attack, giving them enough time to flee, and were offered shelter in Muslim homes.⁹⁴ Despite these efforts, ten Hindus were injured and thirty-two homes damaged and looted.⁹⁵ Police were deployed to the area, and donations of food and money were organized by the district deputy commissioner after the attack.⁹⁶ Sixteen people were arrested, including the Muslim teacher.⁹⁷
- According to the Bangladesh Hindu Buddhist and Christian Unity Council, at least twenty-three *pandals* (religious structures) were vandalized, including five in the Batrish area of Kishoreganj Town, in the two weeks leading up to the October Hindu Durga Puja festival.⁹⁸ The government coordinated with the religious organizations to increase awareness and security in the Hindu areas and attempted to protect the more than 28,000 remaining *pandals*.⁹⁹ Media groups reported that people from diverse religious and political backgrounds rallied against the vandalism and the police arrested suspects.¹⁰⁰ Hindus were able to observe the festival and celebrate Puja peacefully while the damaged religious structures were repaired.¹⁰¹

⁸⁹ OHCHR, *supra* note 42.

⁹⁰ U.S. DEPARTMENT OF STATE, *supra* note 1.

⁹¹ *Id.*

⁹² *Id.*

⁹³ *Id.*

⁹⁴ *Id.*

⁹⁵ *Id.*

⁹⁶ *Id.*

⁹⁷ *Id.*

⁹⁸ U.S. DEPARTMENT OF STATE, *supra* note 1.

⁹⁹ *Id.*

¹⁰⁰ *Id.*

¹⁰¹ *Id.*

- There are also reports of instances of forced conversion of religious minorities, including Hindus, to Islam. According to the 2014 IRF Report, local inhabitants reported that in May of 2014 a group of Muslim men in Lalmonirhat abducted, forcibly converted, illegally married, and raped a twelve-year-old Hindu girl.¹⁰² The police refused to investigate the incident and pressured the victim's family to drop the case, according to a local Hindu community leader, who continued to state that another girl had been abducted in a similar manner in the previous month.¹⁰³
- Prior to general elections and afterwards, Bangladesh "has seen a series of attacks on the Hindu minority in different parts of the country."¹⁰⁴ At least 150 Hindu homes in Chittagong Hill Tracts were burned on January 5, 2014, according to press reports, and at least as many homes and shops were burned in Hindu communities in the Village of Kornai in Dinajpur District.¹⁰⁵ Two Hindu homes and five Hindu shops in the Gaibandha District were also destroyed on January 7, 2014, by activists of the BNP and the Jamaat-e-Islami, injuring five persons.¹⁰⁶ On December 13, 2013, activists from Jamaat-e-Islami (JI) torched the home of a Hindu family that was being targeted for their land.¹⁰⁷
- When the election polls closed on January 5, 2014, a group of Muslim youths attacked Malopara Village after "low-caste" Hindus had voted.¹⁰⁸ The violence followed from warnings that had been given that morning from inhabitants of neighboring Muslim villages urging them not to do so.¹⁰⁹ Several attackers were injured as Malopara men defended the village from attackers, who tried and were successful in spreading rumors that a young Muslim man had died, which sparked a larger attack by around two hundred people later that evening.¹¹⁰ Muslim residents from neighboring villages across the river protected the victims.¹¹¹ The attackers torched and looted 107 homes, smashed icons, and burned fishing nets, and also took money and jewelry.¹¹² Three days later, two Hindu women were gang

¹⁰² U.S. DEPARTMENT OF STATE, *supra* note 1.

¹⁰³ *Id.*

¹⁰⁴ Sanjay Kumar, *Islamic Fundamentalists Terrorize Minorities in Bangladesh*, THE DIPLOMAT (Jan. 15, 2014), <http://thediplomat.com/2014/01/islamic-fundamentalists-terrorize-minorities-in-bangladesh>, archived at <https://perma.cc/J9C8-FYG8>.

¹⁰⁵ U.S. DEPARTMENT OF STATE, *supra* note 1.

¹⁰⁶ *Id.*

¹⁰⁷ Joseph Alchin, *The Hindus of Bangladesh Fear for Their Future*, TIME (Jan. 14, 2014), <http://world.time.com/2014/01/14/the-hindus-of-bangladesh-are-fearing-for-their-future>, archived at <https://perma.cc/22AZ-8NSF>.

¹⁰⁸ U.S. DEPARTMENT OF STATE, *supra* note 1.

¹⁰⁹ *Id.*

¹¹⁰ *Id.*

¹¹¹ *Id.*

¹¹² *Id.*

raped at Monirampur in Jessore.¹¹³ The arrested suspects told the police the rapes were in retaliation for the Hindu community's voting in the parliamentary elections.¹¹⁴

More recently, as part of an orchestrated targeting campaign against religious minorities, atheists, and secular activists/bloggers, a Hindu priest and a Hindu monastery worker were hacked to death in early June 2016.¹¹⁵ In mid-June a Hindu college teacher was attacked in Bangladesh by three men armed with knives.¹¹⁶

B. Christians

In July 2014, Catholic media reported that an armed mob of fifty to sixty men broke into the Catholic convent in the Dinajpur District of Boldipukur.¹¹⁷ Reportedly, the attack lasted for approximately an hour and a half and included robbery and the attempted rape of the nuns.¹¹⁸ Some reports said the attackers sought the deeds of the land where the convent was located.¹¹⁹ By the time the police arrived, the attackers had dispersed.¹²⁰ More than one hundred nuns and priests, along with thousands of Catholics, joined demonstrations for justice in Dhaka and Rangpur.¹²¹ Twelve people were arrested in connection with the attack.¹²² According to a Christian organization, the police were able to immediately bring the situation under control.¹²³ In addition to such violence, some churches have received death threats from Islamist militants.¹²⁴

On January 7, 2014, local indigenous Mandi Catholic farmers were attacked in a potato field by a group of people from the Muslim majority community who went on to burn a home in Jamalpur District in northern Bangladesh in what appeared to be a land dispute.¹²⁵ Victims of the attack reported that Muslim neighbors had rushed to defend their Mandi neighbors and were also injured.¹²⁶ Mandis claimed they generally enjoyed peaceful relations with their longstanding

¹¹³ *Id.*

¹¹⁴ *Id.*

¹¹⁵ Ali, *supra* note 31.

¹¹⁶ Priyanka Mogul, *Bangladesh Killings: Hindu Teacher Knifed in Wave of Attacks Against Religious Minorities*, INTERNATIONAL BUSINESS TIMES (June 15, 2016), <http://www.ibtimes.co.uk/bangladesh-killings-hindu-teacher-knifed-wave-attacks-against-religious-minorities-1565694>, archived at <https://perma.cc/6WAC-QD38>.

¹¹⁷ U.S. DEPARTMENT OF STATE, *supra* note 1.

¹¹⁸ *Id.*

¹¹⁹ *Id.*

¹²⁰ *Id.*

¹²¹ *Id.*

¹²² *Id.*

¹²³ *Id.*

¹²⁴ Ali, *supra* note 31.

¹²⁵ U.S. DEPARTMENT OF STATE, *supra* note 1.

¹²⁶ *Id.*

Muslim neighbors, but it was with the recent Muslim settlers seeking to seize indigenous properties that they faced troubles.¹²⁷ On June 5, 2016, a Christian was knifed to death “after Sunday prayers near a church in northwest Bangladesh in an attack claimed by Islamic State.”¹²⁸

Some Christians reported discrimination on the part of Muslim landlords who refused to rent apartments to them.¹²⁹ Members of religious minorities often report private discrimination in such instances as employment and housing.¹³⁰

In the Chittagong Hill Tracts, tensions over issues that were by nature not originally religious later acquired religious overtones because many of the inhabitants were Hindu, Buddhist, or Christian members of tribal groups.¹³¹ According to rights groups, there was exceptionally high anti-minority sentiment in the Chittagong Hill Tracts.¹³² According to some, Bengali Muslim settlers would spread false rumors that indigenous communities were attempting to form an autonomous Christian state, which resulted in routine police and military monitoring of Christian workers’ activities.¹³³

C. Ahmadiyyas

The Ahmadiyya, or Ahmadis, comprise a Muslim sect considered by many conservative Muslims to be heretical and are frequent targets of persecution.¹³⁴ On December 25, 2015,¹³⁵ three members of the Ahmadiyya Muslim Community were wounded by a suicide bombing at a mosque in a village in northern Bangladesh during Friday Prayers. The bombing was claimed by ISIS, but the police blame the homegrown militant group Jamayetul Mujahideen Bangladesh.¹³⁶ The president of the Ahmadiyya community in Mochmoli Village, Saiful Islam, affirmed that the bomber was the only person killed.¹³⁷

According to the 2014 State Department report, Ahmadis face many social pressures that cause the leaders of the minority Muslim religious communities a lot of concern; one Ahmadiyya community leader said that Ahmadi mosques were usually targeted by conservative Muslims, but

¹²⁷ *Id.*

¹²⁸ *Christian Murdered in Latest Bangladesh Attack*, THE GUARDIAN (June 5, 2016), <https://www.theguardian.com/world/2016/jun/05/christian-murdered-latest-bangladesh-attack-isis>, archived at <https://perma.cc/RZU7-94GM>.

¹²⁹ U.S. DEPARTMENT OF STATE, *supra* note 1.

¹³⁰ *Id.*

¹³¹ *Id.*

¹³² *Id.*

¹³³ *Id.*

¹³⁴ Julfikar Ali Manik, *Suicide Bomber Strikes at Ahmadi Mosque in Bangladesh*, NY TIMES (Dec. 25, 2015), <http://www.nytimes.com/2015/12/26/world/asia/bangladesh-suicide-bombing.html>.

¹³⁵ *Id.*

¹³⁶ *Id.*

¹³⁷ *Id.*

the government tries to protect the Ahmadiya community.¹³⁸ According to a 2016 Freedom House report, “despite state protection, they have encountered violence, boycotts, and demands that the state declare them non-Muslims. They are also occasionally denied permission to hold religious events.”¹³⁹ The following is an incident mentioned in the State Department’s 2013 IRF Report:

The Ahmadiyya Muslim community also suffered harassment. For example, the conservative Muslim group Tehrik-e-Khatme Nabuwat held a rally in Dhaka against the Ahmadiyya on January 3. The same group reportedly assembled a 20,000-strong mob to set fire to the canopy, tents, and stage of an annual Ahmadiyya event in Kaliakor on February 26. Police made no arrests.¹⁴⁰

In 2015, the UN Special Rapporteur on freedom of religion or belief noted that government officials make public statements “that Ahmadis allegedly are not Muslims” and this is one of the ways government agencies “partially compromise the principle of secularism, possibly with the intention to appease religious militants.”¹⁴¹

D. Rohingya

For decades, Bangladesh has hosted an estimated 30,000 officially-recognized Rohingya Muslim refugees who fled religious persecution in Burma in two government-run camps in Cox’s Bazaar, near the Bangladesh-Burmese border.¹⁴² An estimated 200,000 to 500,000 Rohingya Muslims deemed illegal immigrants live outside the camps, in deplorable conditions.¹⁴³ In late 2015, the Bangladesh government began conducting a census of the Rohingya population.¹⁴⁴ Reportedly, participants in the census will receive an identification card from the International Organization for Migration, which will improve access to health care and education.¹⁴⁵

E. Shi’as

In mid-March 2015, a Shi’a preacher and homeopathic doctor was stabbed to death in southwest Bangladesh; the Islamic State claimed responsibility for the crime but the police rejected this

¹³⁸ U.S. DEPARTMENT OF STATE, *supra* note 1.

¹³⁹ FREEDOM HOUSE, *supra* note 7.

¹⁴⁰ U.S. DEPARTMENT OF STATE, BUREAU OF DEMOCRACY, HUMAN RIGHTS AND LABOR, INTERNATIONAL RELIGIOUS FREEDOM REPORT FOR 2013: BANGLADESH § I. Religious Demography, <http://www.state.gov/j/drl/rls/irf/2013/sca/222325.htm>, archived at <http://www.state.gov/j/drl/rls/irf/religiousfreedom/index.htm?year=2013&dliid=222325>.

¹⁴¹ OHCHR, *supra* note 42.

¹⁴² USCIRF, *supra* note 32, at 210.

¹⁴³ *Id.*

¹⁴⁴ *Id.*

¹⁴⁵ *Id.*

claim.¹⁴⁶ Quoting the police reports, *The National* reported in October 2015 that a bomb attack on the main Shiite shrine in Dhaka had killed at least one person and left nearly eighty wounded as thousands gathered for the annual Ashura procession.¹⁴⁷ Three bombs exploded during the procession, which approximately 20,000 people were attending.¹⁴⁸ Police believe this is the first time Bangladesh's tiny Shiite community has been targeted, the report said.¹⁴⁹

F. Buddhists

The Bangladeshi Buddhist minority is predominantly found in the Chittagong Hill Tracts among the indigenous non-Bengali populations.¹⁵⁰ As per a 2009 World Bank study, there are no known government-run Buddhist schools, or any religious schools receiving funds and aid from the Bangladeshi government.¹⁵¹

According to the State Department's 2013 IRF Report, representatives of religious minorities have voiced their concerns that the government at times has failed to prevent violent attacks and persecution against them by non-state actors.¹⁵² They have stated that in some instances it was the police that failed to arrest perpetrators of abuses and that the courts have failed to effectively administer justice.¹⁵³ One of the most well-known acts of communal violence is the Ramu incident of 2012, in which "more than 20 historic Buddhist temples were ransacked, torched and finally destroyed. At the same time, quite a number of houses owned by Buddhists burnt down to ashes."¹⁵⁴

According to the 2013 IRF Report, following the December 2012 attacks against Buddhists in Ramu, Ukhia, and Teknaf, nineteen criminal cases were filed, resulting in the indictment of 364 people in seven related cases and 193 arrests, but the main investigation remained stalled.¹⁵⁵ Inflammatory material that was reported to be posted by a local Buddhist youth had sparked the violence.¹⁵⁶ He remained missing, so the investigation team could not record his statement. The

¹⁴⁶ *Bangladesh: Top Shia Preacher Killed in Attack Claimed by IS*, THE INDIAN EXPRESS (Mar. 15, 2015), <http://indianexpress.com/article/world/world-news/bangladesh-islamic-state-isis-shia-attack-news/>, archived at <https://perma.cc/BWN8-XXMD>.

¹⁴⁷ *One Killed, 80 Wounded in Attack on Bangladesh Shiites*, THE NATIONAL (Oct. 24, 2015), <http://www.thenational.ae/world/south-asia/one-killed-80-wounded-in-attack-on-bangladesh-shiites>, archived at <https://perma.cc/UEJ7-53AA>.

¹⁴⁸ *Id.*

¹⁴⁹ *Id.*

¹⁵⁰ U.S. DEPARTMENT OF STATE, *supra* note 137.

¹⁵¹ *Id.*

¹⁵² *Id.*

¹⁵³ *Id.*

¹⁵⁴ OHCHR, *supra* note 42.

¹⁵⁵ U.S. DEPARTMENT OF STATE, *supra* note 137.

¹⁵⁶ *Id.*

youth's family, which belongs to the Buddhist minority, remains unaware of his whereabouts and well-being.¹⁵⁷

Several journalists, academic observers, and NGOs have alleged that the ruling Awami League's student wing, the Chhatro League, played a large part in organizing the attacks against Buddhist religious sites in the December 2012 attacks in Ramu.¹⁵⁸ The top-ten culprits identified in the post-Ramu inquiries remained free due to their political connection to the ruling party, according to local civil society representatives.¹⁵⁹

The government's response to the December 2012 attacks included 200 million taka (about \$2.5 million) for the reconstruction by Border Guard Bangladesh and the Bangladesh Army's Engineering Corps of nineteen burned temples and monasteries. The rebuilt structures in Ramu and Ukhia were inaugurated by Prime Minister Hasina Sheikh on September 3, 2013, and she reaffirmed her party's commitment to preserving the Buddhist community's security.¹⁶⁰ According to the Special Rapporteur on freedom of religion or belief "the Government reacted promptly and restored the destroyed temples, thus also sending a much-needed message that such acts will not be tolerated. However, none of the perpetrators of the Ramu violence have been brought to justice as of now."¹⁶¹

Buddhist communities were also targeted during the violence that surrounded the January 2014 parliamentary election.¹⁶² In more recent violence, an elderly Buddhist monk was hacked to death in mid-May 2016, which was part of the latest in a series of murders of religious minorities and secular activists in Bangladesh by Islamic militants.¹⁶³ According to the Special Rapporteur on freedom of religion or belief, "I also heard Buddhists in the CHT being associated with Myanmar, where Buddhists constitute the majority religion. Reportedly, there have been isolated incidents, in which militant Muslims called upon the Buddhists to leave the country and settle in Myanmar. Fortunately, such ideas do not find an echo in the larger society."¹⁶⁴

¹⁵⁷ *Id.*

¹⁵⁸ *Id.*

¹⁵⁹ *Id.*

¹⁶⁰ *Id.*

¹⁶¹ OHCHR, *supra* note 42.

¹⁶² USCIRF, *supra* note 32, at 209.

¹⁶³ *Elderly Buddhist Monk Hacked to Death in Bangladesh, Say Police*, AGENCE FRANCE-PRESSE (May 14, 2016), <http://www.telegraph.co.uk/news/2016/05/14/elderly-buddhist-monk-hacked-to-death-in-bangladesh-temple/>, archived at <https://perma.cc/9BF5-P55Z>.

¹⁶⁴ OHCHR, *supra* note 42.