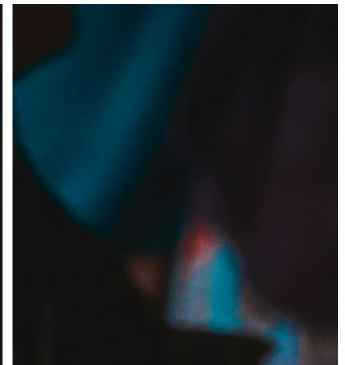
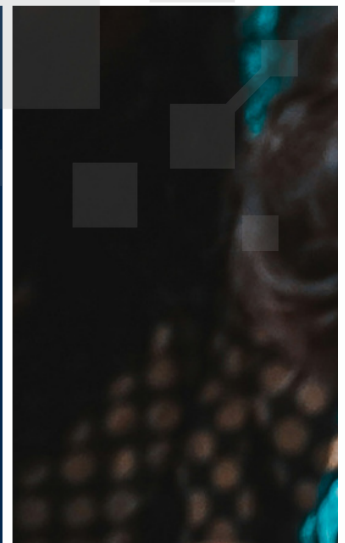
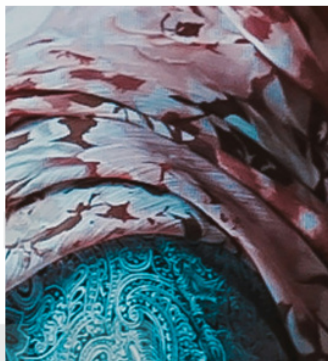


STOLEN GIRLS

EXPOSING THE HIDDEN SUFFERING OF
CHRISTIAN MINOR GIRLS IN PAKISTAN



July
2026



Voice for
Justice



JUBiLEE
campaign

Voice for Justice is a non-profit organization registered in the Netherlands with a mission to liberate people from slavery, poverty and to prevent acts of injustice. VFJ aims to bring change in the lives of the poor and ensure justice for those that have been wrongly treated.

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Jubilee Campaign is a non-governmental organization in consultative status with the Economic and Social Council (ECOSOC) since 2003. Our work focuses on promoting the rights of religious and ethnic minorities and raising the status of vulnerable women and children - to protect them from bodily harm and exploitation.

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ABBREVIATIONS & DEFINITIONS

B-Form	Child Registration Certificate issued by NADRA
CEFM	Child, Early and Forced Marriage is a human rights violation involving marriages in which one or both spousal parties are under the age of 18 and therefore cannot consent
CII	The Council of Islamic Ideology is a constitutional advisory entity in Pakistan tasked with reviewing proposed legislation to determine whether it aligns with the injunctions of Islam and
CMC	A Case Management Conference is a procedural hearing in which the judge, parties, and their legal representatives meet to discuss the management, timelines, and progression of a case
Cr.P.C	The Code of Criminal Procedure provides guidelines for the investigation and prosecution process
FCC	The Federal Constitutional Court is the premier judicial body which interprets the constitution and presides over cases between the federal government and the provincial branches
FIR	A First Information Report is a formal written document prepared by the police upon receiving information about the commission of a cognizable offence, thereby initiating the criminal justice process
ICCPR	The International Covenant on Civil and Political Rights is an international human rights treaty adopted by the United Nations, guaranteeing civil and political rights
ICT	The Islamabad Capital Territory surrounds the capital
IHC	The Islamabad High Court is the Capital Territory's principal judicial authority, overseeing two lower district courts
LHC	The Lahore High Court is the principal judicial authority for the province of Punjab
NADRA	The National Database and Registration Authority is the government body responsible for maintaining citizens' registration and identity records in Pakistan
NCHR	The National Commission for Human Rights is an independent statutory body mandated to monitor, protect, and promote human rights in Pakistan
NGO	A Non-governmental organization is a civil society group that operates independently from government and typically focuses on social causes, charitable services, or community development
PPC	The Pakistan Penal Code of 1860 outlines criminal offenses
PTSD	Post-traumatic stress disorder is a mental health condition resulting from experiencing one or multiple disturbing incidents. PTSD symptoms comprise insomnia, emotional dysregulation, intrusive flashbacks, hyperarousal and anxiety, avoidance, etc.
SHC	The Sindh High Court is the principal judicial authority for the province of Sindh
SMC	A Suo Motu Case is initiated by a court of its own volition, typically in matters of public importance or fundamental rights, without a formal petition from any involved party
UDHR	The Universal Declaration of Human Rights is the United Nations' first legally non-binding proclamation enshrining internationally recognized human rights
UN	The United Nations is an international organization established after World War II to prevent future conflicts and work towards global peace and human security
UNICEF	The United Nations Children's Fund is the UN agency which serves children around the world in the sectors of education, health, and humanitarian aid

TABLE OF CONTENTS

Background	1
Introduction	2
The Human Cost	2
Methodology	3
Limitations & Ethics	3
Key Findings - Quantitative Data	4
<i>Case Study: Jessica</i>	4
Table 1. Forced Conversions by Year	4
Figure 1. Forced Conversions by Year	4
Table 2. Forced Conversions by Province	5
Figure 2. Geographic Distribution by Province	5
Figure 3. Child marriage rate, Sindh Province	5
Table 3. Forced Conversions by District	6
Figure 4. Geographic Distribution in Punjab Province by District	6
<i>Case Study: Jiya</i>	7
Table 4. Forced Conversions by Victims' Age Bracket	8
Figure 5. Forced Conversions by Victims' Age Bracket	8
Table 5. Age Difference between Victims and Perpetrators	9
<i>Case Study: Nisha</i>	10
Table 6. Manipulation of Marriage and Conversion Certificates	11
Qualitative Analysis	12
<i>Case Study: Neha</i>	13
<i>Case Study: Laiba</i>	14
Application of Relevant Laws by Police	14
<i>Case Study: Amber</i>	15
Minorities' Access to Justice & Institutional Response	16
Judicial Responses & Outcomes	17
<i>Case Study: Alina</i>	18
<i>Case Study: Angelina</i>	19
Global Standing & International Responses	22
Table 7. Countries with highest rates of child marriage of girls (ranked)	22
Figure 6. Countries with highest rates of child marriage of girls	22
Figure 7. Child marriage prevalence trends by global region	23
<i>Case Study: Sidra</i>	23
Figure 8. Child marriage prevalence trends, South Asia	24
<i>Case Study: Aneeqa</i>	26
<i>Case Study: Sataish</i>	27

TABLE OF CONTENTS

Child Marriage: Progress & Challenges	28
Figure 9. Timeline of legal proposals relevant to child marriage and religious freedom	28
<i>Case Study: Diana</i>	30
<i>Case Study: Nayab</i>	31
Psychosocial Impacts	31
Stigmatization & Marginalization	31
Psychological & Clinical Outcomes	32
<i>Case Study: Jessica</i>	32
Developmental Disruption & Stagnation	32
Family Turmoil	33
Intergenerational Consequences	33
Maria Shahbaz Case Timeline	34
Policy Recommendations	39
References	41
Appendices	42
Appendix A: Abridged Additional Cases	42
Appendix B: List of Cases, 2019 - 2025	53
Appendix C: Case Documents	58
Appendix D: Expert Insights	72
Appendix E: Relevant Legislations	77

BACKGROUND

Forced conversions of minority girls in Pakistan remain a serious human rights concern rooted in gender-based violence, religious discrimination, and weak institutional protection. In many reported cases, abduction is followed by coerced conversion, child marriage, and sexual violence, leaving girls and their families with limited access to justice. These abuses most often affect Christian and other religious minority communities, where age, gender, and social vulnerability combine to increase risk.

The legal response to forced conversions has been inconsistent and often ineffective. Although Pakistan's laws prohibit abduction, child marriage, and sexual violence, there exists no fully operative national framework that clearly addresses coerced religious conversion as a distinct offense. Attempts to introduce protective legislation have repeatedly faced resistance. A parliamentary effort begun in 2019 stalled, and the proposed Prohibition of Forced Conversions Bill 2021 was not taken forward after objections from government bodies, namely the Ministry of Religious Affairs and Interfaith Harmony and the Council of Islamic Ideology. These institutions opposed provisions on minimum age and legal procedure for conversion, arguing that they conflicted with religious principles, and the act, if enacted, may undermine Muslims' right to religious freedom to convert Non-Muslims to Pakistan.

At the same time, Pakistan's broader legal context has begun to shift in relation to child marriage. In 2025 and 2026, several jurisdictions, including Islamabad Capital Territory, Balochistan, and Punjab, adopted child marriage restraint laws setting 18 as the minimum marriage age and imposing stronger penalties on those who facilitate underage marriages. These developments are relevant because forced conversion cases often involve underage girls who are then subjected to marriage soon after conversion. The growing recognition of child marriage as a criminal and child-protection issue strengthens the case for a more robust response to coercive conversion practices.

Universal Declaration of Human Rights Article 18

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

Freedom of religion or belief is a fundamental human right protected under international law. It includes the right of every individual to adopt, change, or manifest or retain a religion or belief freely, as well as the right not to be forced to convert against one's will.² International human rights law allows states to prohibit conversion obtained through coercion, fraud, intimidation, or violence. The prohibition of coercive conversion is particularly critical in cases involving minor children, who are entitled to enhanced legal protection and cannot be expected to make life-altering decisions under conditions of pressure, dependency, manipulation, or fear. These protections are absolute in nature and cannot be limited or restricted in a discriminatory manner.³

This report is prepared against that backdrop. It seeks to document patterns of forced conversion, abduction, child marriage, and sexual violence affecting minority girls in Pakistan, and to highlight the legal gaps and institutional failures that allow these abuses to continue. Beyond being just a legal duty, the protection of minor girls and upholding constitutional rights is a moral imperative essential to strengthening the rule of law and ensuring an inclusive and just society.

INTRODUCTION

In 2022, Voice for Justice, in collaboration with Jubilee Campaign, published a report, *Conversion Without Consent*, which drew attention to the abduction, forced conversion, child marriage, and sexual violence faced by Christian girls in Pakistan.⁴ **Building on that foundational work, *Stolen Girls* presents an updated analysis of cases documented between January 2019 and December 2025.**

Using documented cases and verified evidence, the report examines recurring patterns, common methods of coercion, and the structural weaknesses that allow these human rights abuses to continue. It also highlights the particular vulnerability of Christian girls and the broader failure of legal and institutional systems to provide effective protection and remedy.

The report further shows how gaps in law enforcement, investigation, and judicial response contribute to impunity for perpetrators in Pakistan. By documenting these patterns, it seeks to inform advocacy, strengthen accountability, and support efforts to protect the rights and dignity of minority girls and women in Pakistan.

The Human Cost

The human cost of these human rights violations is profound and enduring. Under the guise of religious conversion and marriage, minority girls are deprived of their rights to childhood, education, family life, bodily autonomy, psychosocial development, and self-realization, all of which are necessary to build lives of dignity and security. In some cases, abducted girls never return to their families, who are unknowing of their whereabouts or well-being. Those who do reunite with their families reckon with deep psychological trauma and physical scars. Families, too, endure immense suffering; in spite of their best efforts to rescue their girls, financial hardship impedes progress, and social stigma silences them and their pleas. Gradually, or all at once, families become disillusioned with the very institutional measures responsible for their protection.



METHODOLOGY

This report examines cases involving abduction, forced religious conversion, and forced marriage of girls and women belonging to the Christian community across Pakistan between January 2019 and December 2025. A comprehensive methodology was employed to identify trends and patterns, assess key actors and contributing factors, and inform the conclusions and recommendations presented in this report.

The study is based on primary and secondary sources, including First Information Reports, court documents, and testimonies from lawyers, journalists, human rights defenders, and civil society organizations involved in case follow-up or legal assistance. Media reports from mainstream, digital, and social platforms were cross-checked against available documentary evidence, such as school records, birth certificates, identity cards, marriage certificates, conversion certificates submitted in court, and judicial verdicts.

The report also reviews the legal provisions applied during registration, investigation, and adjudication of cases. Particular attention is given to the way police and courts interpret evidence, apply the law, and handle claims of consent, age, and conversion. This helps identify systemic gaps that hinder justice and allow coercion to persist.

Moreover, the methodology also takes into account the insights of practitioners and advocates working closely with survivors and affected families. Their perspectives provide important context on barriers to justice and the impact of these violations on victims and their communities.

Limitations & Ethics

The report acknowledges limitations, including underreporting, restricted access to some legal records, and the reluctance of survivors and families to share testimony because of fear, stigma, or retaliation. For this reason, the cases documented in the report should be understood as indicative rather than exhaustive. All research was conducted with respect for privacy, dignity, and safety. Where necessary, personal details were anonymized to protect survivors and participants from harm.



KEY FINDINGS

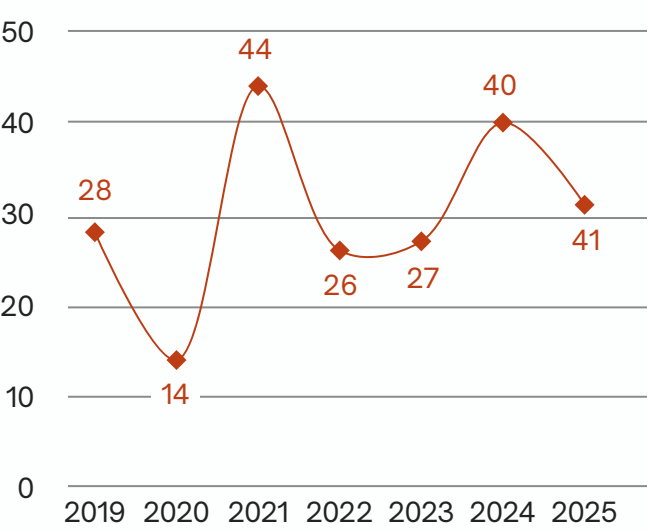
Quantitative Data

A total of 210 cases related to abduction, coerced religious conversion, and forced marriage involving Christian girls were documented across the country between January 2019 and December 2025.

The annual distribution reveals considerable variation in the number of complaints received over the seven years. In 2019, a total of 28 complaints (13.3%) were documented. The number declined significantly to 14 cases (6.7%) in 2020, representing the lowest annual figure during the study period. In 2021, the number of complaints increased sharply to 44 cases (21.0%), the highest annual total in the dataset. The number of documented complaints remained relatively high in the following years, with 26 cases (12.4%) in 2022, 27 cases (12.9%) in 2023, 40 cases (19.0%) in 2024, and 31 cases (14.8%) in 2025. This increase may reflect the improved reporting mechanisms, greater media attention, and intensified monitoring by civil society organizations. The consistently high numbers after 2021 suggest that the phenomenon has remained persistent rather than episodic.

Table 1. Forced Conversions by Year		
Year	# of Cases	Percentage
2019	28	13.3%
2020	14	6.7%
2021	44	21%
2022	26	12.4%
2023	27	12.9%
2024	40	19%
2025	31	14.8%
Total	210	100%

Figure 1. Forced Conversions by Year



CASE STUDY *Jessica*

In late April 2025, 32-year-old man Azeem Ullah abducted his neighbor’s daughter, 16-year-old Jessica Iqbal in Lahore, Punjab, and brought her to an undisclosed location. Jessica’s father Iqbal Masih immediately filed an FIR with local authorities, expressing his incredulity that a man double his teenage daughter’s age had potentially been grooming her prior to the kidnapping. Police arrested Ullah for a cursory interrogation, during which the perpetrator declined to reveal Jessica’s location. Notwithstanding Masih’s reasoning that the officers should not release Ullah until Jessica is tracked down and returned, the abductor was free to go home, after which he fled the community just three days later.

On May 16, Jessica was brought before Lahore Magistrate Hassan Sarfraz Cheema and stated that her faith conversion and marriage to Ullah were by her own choice. The girl’s parents were devastated by her claim and pleaded with her to reconsider; they cited her reluctance to recite the Kalima or discuss basic Islamic tenets as an indication that her faith conversion was externally induced rather than an organic transformation of beliefs. Abhorrently, the magistrate accepted the girl’s testimony without exercising due diligence to investigate her age and the circumstances of her conversion and marriage.⁵

Table 2. Forced Conversions by Province

Year	Punjab	Sindh	Khyber Pakhtunkhwa	Balochistan	Total
2019	25	3	0	0	28
2020	13	1	0	0	14
2021	38	5	1	0	44
2022	24	2	0	0	26
2023	26	1	0	0	27
2024	31	8	1	0	40
2025	29	2	0	0	31
Total	186	22	2	0	210
Percentage	88.6%	10.5%	1.0%	0	100%

The provincial distribution demonstrates that of the 210 cases, 186 (88.6%) originated from Punjab, 22 cases (10.5%) from Sindh, and only two cases (1.0%) from Khyber Pakhtunkhwa, one each in 2021 and 2024. No documented complaints from Balochistan were included in the dataset.

Punjab consistently recorded the highest number of complaints in every year of the study, ranging from 13 cases in 2020 to 38 cases in 2021. The province accounted for nearly nine out of every ten documented complaints, indicating that the issue of forced conversions is particularly severe for Christians in Punjab. This concentration corresponds with the fact that Punjab is home to the largest Christian population in Pakistan, although the figures may also reflect comparatively stronger documentation and reporting mechanisms within the province.

Sindh recorded substantially fewer documented complaints involving Christian girls, ranging from one to eight cases annually, given the fact that Sindh is home to the largest Hindu population in Pakistan. The province experienced a noticeable increase in 2024, when eight complaints were documented, representing the highest annual figure for Sindh during the study period, which may indicate improved reporting.

While figures of complaints from Khyber Pakhtunkhwa appear low, they should not necessarily be interpreted as evidence of limited occurrence, as underreporting, smaller minority populations, security constraints, and weaker documentation mechanisms may also influence the recorded numbers.

Overall, the provincial analysis indicates that the complaints of abduction, coerced conversion, and forced marriage involving Christian girls are geographically concentrated in Punjab, while remaining an issue of concern in Sindh and, to a much lesser extent, Khyber Pakhtunkhwa.

Figure 2.
Geographic
Distribution
by Province

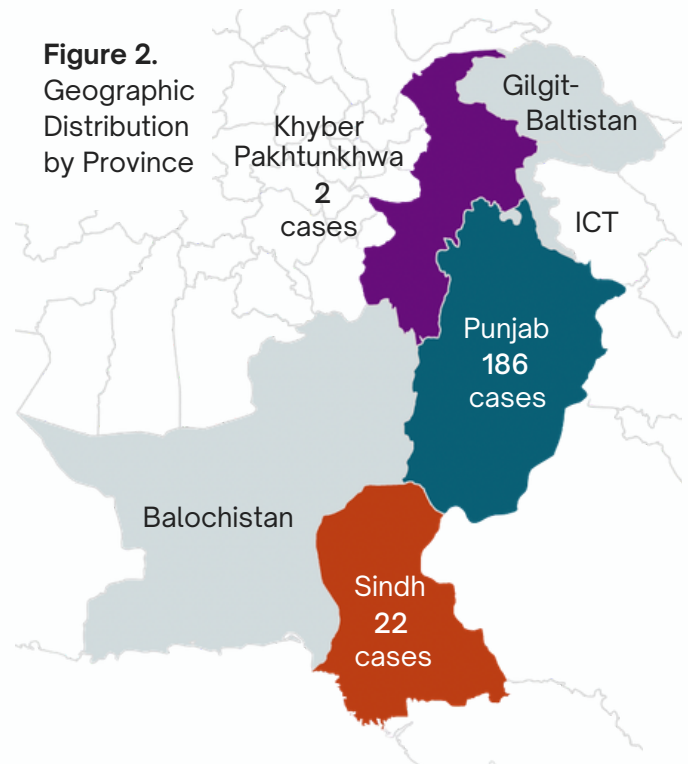
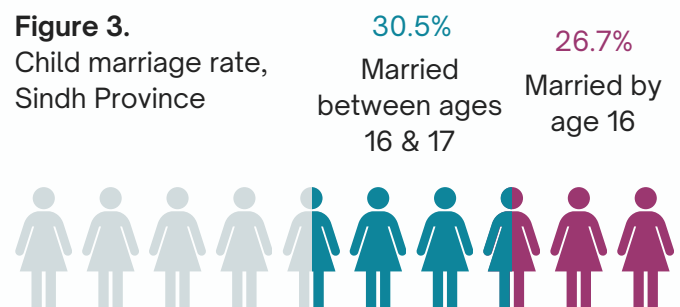


Figure 3.
Child marriage rate,
Sindh Province



District	2019	2020	2021	2022	2023	2024	2025	Total	%
Lahore	7	4	9	5	5	8	15	53	25.2%
Faisalabad	7	4	4	8	5	4	7	39	18.6%
Gujranwala	2	1	7	1	3	1	1	16	7.6%
Karachi	2	1	2	2	1	3	3	14	6.7%
Sheikhupura	4	0	3	1	3	1	1	13	6.2%
Kasur	1	0	2	0	1	4	1	9	4.3%
Islamabad / Rawalpindi	1	0	2	1	1	3	1	9	4.3%
Bahawalpur	1	0	2	0	1	0	3	7	3.3%
Sialkot	0	0	0	0	0	4	3	7	3.3%
Okara	0	1	0	2	1	0	2	6	2.9%

The analysis of district-level data reveals that nearly two-thirds of all documented complaints are concentrated in a relatively small number of districts over several consecutive years. **Lahore** recorded the largest number of documented complaints (53 cases, 25.2%), followed by **Faisalabad** (39 cases, 18.6%), **Gujranwala** (16 cases, 7.6%), Karachi (14 cases, 6.7%), and **Sheikhupura** (13 cases, 6.2%). Together, these five districts accounted for 135 complaints, representing approximately 64% of all documented cases during the study period.

Lahore remained the principal hotspot throughout the study period, recording complaints every year and showing a notable increase in 2025. As the provincial capital and one of Pakistan's largest urban centres, Lahore hosts a sizeable Christian population and has relatively greater media coverage, legal advocacy, and civil society engagement, all of which may contribute to improved documentation and reporting.

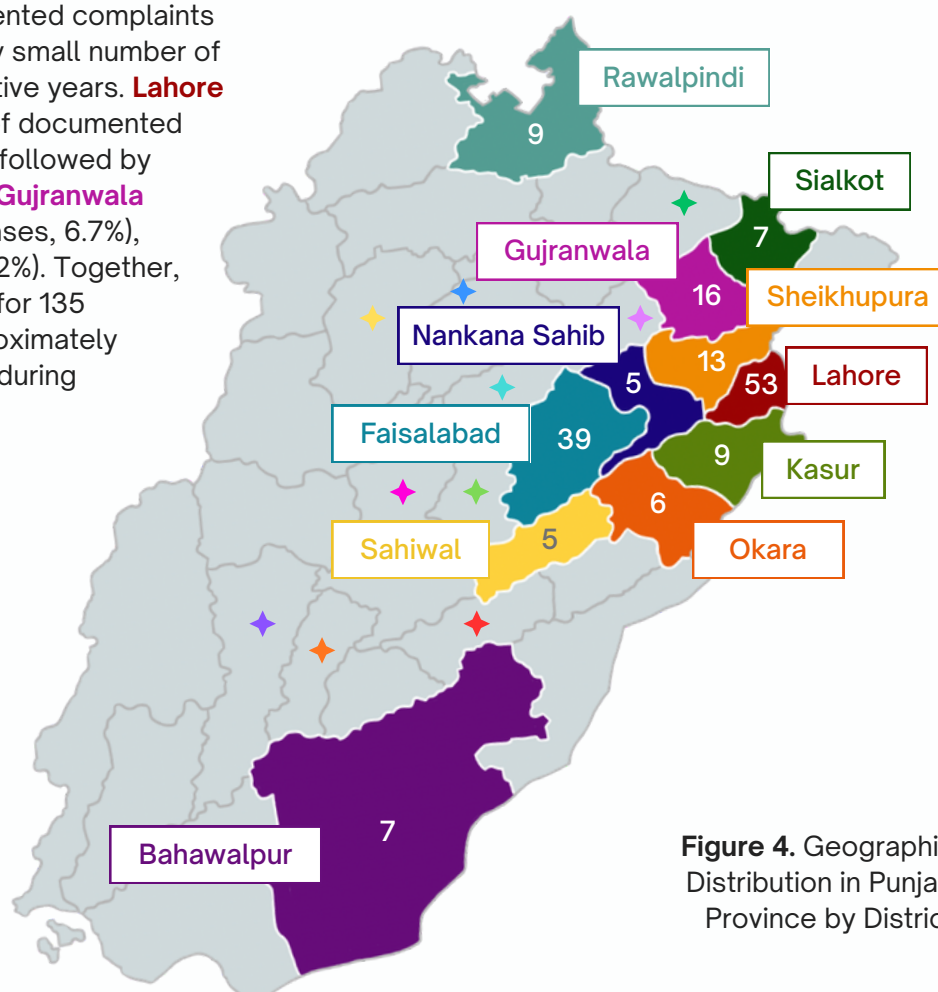


Figure 4. Geographic Distribution in Punjab Province by District

Faisalabad consistently ranked as the second most affected district, recording complaints every year of the study. Other districts, including Gujranwala, Karachi, Sheikhupura, **Kasur**, **Islamabad/Rawalpindi**, **Bahawalpur**, **Sialkot**, and **Okara**, also emerged as recurring hotspots, indicating that the phenomenon is not confined to isolated locations but extends across multiple districts with sizeable minority populations.

**These districts only recorded 1-2 cases:

- ◆ Chiniot; ◆ Gujrat; ◆ Jhang; ◆ Khushab;
- ◆ Multan; ◆ Muzaffargarh; ◆ Sargodha;
- ◆ Toba Tek Singh; ◆ Vehari; ◆ Wazirabad

CASE STUDY *Jiya*⁶

Jiya Liaqat, a 16-year-old Christian girl from Burewala Tehsil of Vehari District in Punjab province, was abducted on April 3, 2026 from her home with the assistance of Sohail Riaz's sister and brother-in-law. She was taken to Gujranwala, another city of Punjab, almost 340Km away from her home in Burewala, where she was forcibly converted to Islam and compelled into marriage against her will.

Jiya's father, Liaqat Masih, a resident of Chak No. 505/WB, Burewala, works alongside his wife as an agricultural labourer on a Muslim landowner's fields. He has seven children, including six daughters and one son. While Jiya, a school dropout, is a minor girl who used to work as a domestic worker to supplement the family's income. A 44-year-old Muslim man, Sohail Riaz, based in UAE, online groomed Jiya for sexual exploitation, recognizing her vulnerability as a minor girl from an impoverished Christian family.

Upon Jiya's disappearance, her father promptly filed an abduction complaint at Burewala Police Station, resulting in the registration of FIR No. 336/26 dated April 4, 2026, against unknown individuals under Section 365-B of the Pakistan Penal Code.

On April 8, 2026, Jiya's sister Sumaira received a WhatsApp call from Sohail Riaz, where he confirmed that he came in contact with Jiya through social media, and she was in his custody and delivered explicit death threats against the entire family if they informed the police or pursued the case.

On April 9, 2026, Liaqat Masih filed a complaint with the Station House Officer (SHO), requesting that the perpetrators be nominated in the FIR and that Jiya be recovered from their custody. Despite possessing information about Jiya's whereabouts and the perpetrators' contact details, the police failed to take meaningful steps toward her recovery.

While Sohail Riaz was residing in the United Arab Emirates, an online marriage between him and Jiya Liaqat was contracted on 15 April 2026 and subsequently registered with Union Council No. 65, Ghanian, Kamoke Tehsil, Gujranwala District. The marriage certificate falsely recorded Jiya's age as exactly 18 years in an apparent attempt to circumvent the Punjab Child Marriage Restraint Act, 2026. Additionally, a conversion certificate dated 15 April 2026 was issued by the Muslim Christian Dialogue Forum (informal, unregistered); notably, the document does not bear the minor girl's signature.

The family subsequently filed a complaint against police inaction with the Regional Police office Multan, citing documented evidence of Jiya's age, which led to the local police's response, dismissive and hostile rather than remedial.

On May 5, 2026, Jiya appeared before the Judicial Magistrate, Gujranwala, and got her statement recorded under section 164 CR.P.C. that "I am an adult, have embraced Islam and contracted marriage with Sohail Riaz with my free will and consent, and no one has abducted or committed rape with me. The FIR registered on my father's complaint of my abduction is totally false, frivolous, and has no reality, so it may kindly be cancelled." The magistrate solely relied on her verbal assertion made under duress without verifying her age through official documentation and without invoking the relevant laws.

Jiya remains in perpetrators' custody, which raises a significant risk of coercion and potential sexual exploitation within Pakistan and the UAE, if they manage to traffic her out of the country. Her family is concerned about her safety, well-being, and physical integrity, and continues to pursue legal remedies for her rescue despite financial constraints.

Table 4. Forced Conversions by Victims' Age Bracket

Year	Below 14 y/o	14 - 17 y/o	Above 18 y/o	Total
2019	6 (21.4%)	19 (67.9%)	3 (10.7%)	28
2020	7 (50%)	4 (28.6%)	3 (21.4%)	14
2021	7 (15.9%)	30 (68.2%)	7 (15.9%)	44
2022	4 (15.4%)	18 (69.2%)	4 (15.4%)	26
2023	8 (29.6%)	16 (59.3%)	3 (11.1%)	27
2024	6 (15%)	23 (57.5%)	11 (27.5%)	40
2025	3 (9.7%)	24 (77.4%)	4 (12.9%)	31
Total	41	134	35	210
Percentage	19.5%	63.8%	16.7%	100%

The age distribution of the 210 victims demonstrates that 134 victims (63.8%) were between 14 and 17 years of age, 41 victims (19.5%) were below 14 years, while 35 victims (16.7%) were 18 years or older.

The 14–17 age group accounted for approximately two-thirds of all documented complaints and remained the largest category from 2019 through 2025. With a mean age of 15.7 years, a median of 15 years, and a mode of 14 years, the data clearly exhibit a deeply disturbing, age-specific pattern that demands urgent and targeted protection measures for vulnerable populations. The concentration of cases among adolescent girls is particularly concerning because many victims are still legally children, are enrolled in school, remain economically dependent on their families, and have limited capacity to resist coercion or seek legal protection.

The data also reveal that children below the age of 14 continued to be targeted. Although they represented one-fifth of all complaints, their victimization is especially alarming because of their heightened vulnerability and limited ability to provide informed consent in matters relating to religion and marriage. Several documented victims were as young as seven, eight, nine, ten, and eleven years old, underscoring the severity of child protection concerns.

Adult women aged 18 years and above accounted for approximately one-sixth of all complaints. While their proportion is comparatively smaller, these cases demonstrate that coercion is not confined to minors. Adult women may also face intimidation, deception, economic dependency, and social

pressures that undermine genuine consent. The low standard deviation (3.71) further confirms that these cases are not randomly distributed but are overwhelmingly concentrated within the early to mid-adolescence age range.

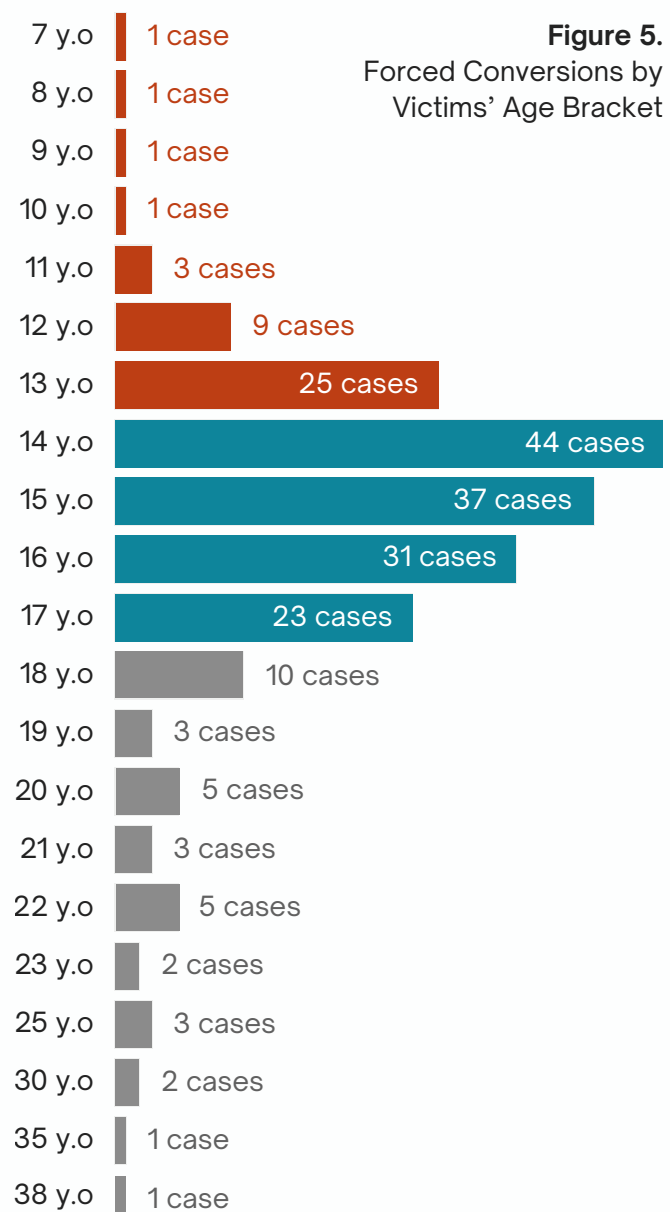


Figure 5.
Forced Conversions by
Victims' Age Bracket

Table 5. Age Difference between Victims and Perpetrators

Victim's Name	Victim's Age	Perpetrator's Name	Perpetrator's Age	Age Difference
Neha Pervaiz	14	Muhammad Imran	45	31 Years
Farzana Sohail	12	Arif Ahsan	45	33 Years
Farah Shaheen	13	Khizer Hayat	45	32 Years
Arzoo Raja	13	Ali Azhar	44	31 Years
Shabana Bibi	21	Muhammad Asif	45	24 Years
Nayab Shahid Gill	14	Saddam Hayat	30	16 Years
Mehwish	14	Muhammad Imran	42	28 Years
Mahnoor Ashraf	14	Muhammad Ali Khan Ghauri	45	31 Years
Zarvia Pervaiz	13	Imran Shahzad	37	24 Years
Saba Nadeem	15	Muhammad Yasir	45	30 Years
Mehwish Razzaq	15	Ghulam Rasool	40	25 Years
Sitara Arif	15	Rana Taysab	60	45 Years
Naina Ashraf	13	Mohammad Iqbal	38	25 Years
Shifa Rafaqat	14	Syed Shabar Ali Gillani	45	31 Years
Laiba Suhail	10	Muhammad Irfan	35	25 Years
Muskan Suleman	15	Arsalan Ali	27	12 Years
Saneha Nazir	14	Muhammad Yasir	45	31 Years
Alina Khalid	14	Haider Ali	25	11 Years
Neha Javed	13	Muhammad Zain	26	13 Years
Muskan Anwar	16	Altaf Ali	35	19 Years
Ariha Pervaiz	13	Shehzad Rehmat Ali	36	23 Years
Ariha Gulzar	14	Shehzad Baloch (Saju)	40	26 Years
Saba Shafiq	13	Muhammad Ali	35	22 Years
Saneha Asher	14	Muhammad Mujahid Siddique	26	12 Years
Jessica Iqbal	16	Azeem Ullah	32	16 Years
Nisha Abass	14	Arshad Habib	41	27 Years
Victoria* Shahzad	16	Muhammad Asim	28	12 Years
Kiran Javed	15	Noor Muhammad	46	31 Years
Alishba Adnan	14	Babar Ali	26	12 Years
Maria Shahbaz	13	Sheryar Ahmed	23	10 Years
Muskan Francis	22	Nasir Ali Nazim	35	13 Years
Aneeqa Fiaz	14	Muhammad Aslam Talib	38	24 Years

The data indicate that coerced faith conversions and child or forced marriages are not isolated incidents, but are instead facilitated by a wider social and ideological environment in which religious identity is politicized, and minority girls are placed at acute risk. The cases reviewed in this study show that the victims are overwhelmingly minors, while the perpetrators are adult men who are often substantially older than the girls. The average age difference between victims and perpetrators is 23 years, and in several cases, the gap exceeds 30 years. This pronounced age disparity reflects a clear imbalance of power and underscores the coercive nature of these abuses.

Many girls between the ages of 10 and 16 are abducted, forcibly converted to Islam, and then forcibly married to their abductors, who are often presented as bachelors in court records despite being much older and, in some cases, already married and with children. These cases reveal not only the vulnerability of child victims but also how legal and documentary processes may be manipulated to obscure the true circumstances of abduction and coercion.

Child brides from minority communities face an increased risk of violence, exploitation, and abuse, all of which threaten their rights to education, health, work, bodily autonomy, and religious freedom. The abduction of schoolgirls also interrupts their education and limits access to skills, livelihoods, and opportunities for self-reliance, thereby deepening their long-term social and economic marginalization.

Early pregnancy further intensifies these harms, placing girls at serious risk of physical and psychological complications and making reunification with their families even more difficult. In many cases, abducted girls from minority communities are not accepted by their in-laws as daughters-in-law; instead, they are treated as domestic servants and subjected to continued control and exploitation. As a result, survivors frequently experience trauma, including flashbacks, nightmares, anxiety, depression, emotional detachment, and difficulty concentrating on study or work, while also facing rejection from both family and community.

CASE STUDY

Nisha

Nisha Abbas⁷, a 14-year-old Christian girl from Lahore District, Punjab, was abducted by Arshad Habib on 12 May 2025 from her place of work. transported Nisha from Lahore to Khanpur in Rahim Yar Khan District, southern Punjab, where she was subsequently subjected to forced religious conversion and coerced marriage.

Nisha suffers from epilepsy and mental health challenges and was employed as a domestic worker in a Muslim household. When she failed to return home from work, her family began searching for her and visited her employer's residence. CCTV footage reportedly showed Nisha leaving the premises in the company of Arshad Habib and his two children. Following her disappearance, police registered an FIR for abduction against 41-year-old Arshad Habib, who had entered into multiple marriages simultaneously and had children from those marriages.

On 2 March 2026, Nisha appeared before a Judicial Magistrate in Lahore and recorded a statement claiming that she was 18 years old, had voluntarily embraced Islam, and had married Arshad Habib of her own free will. She also requested protection from her family, alleging that they were threatening her.

The accused subsequently produced documents before the police purporting to show that Nisha had willingly converted to Islam and entered into marriage. However, the family contests the authenticity and validity of these documents, maintaining that Nisha is a minor and that the conversion and marriage were orchestrated to shield the perpetrator from criminal liability.

Despite the statement recorded before the magistrate, Nisha's family continues to pursue legal remedies for her recovery, arguing that her age, health condition, and circumstances surrounding her disappearance warrant a thorough investigation into the alleged abduction, coercion, and exploitation. The case is particularly concerning given Nisha's medical and mental health vulnerabilities, which allegedly made her especially susceptible to exploitation and abuse.

Table 6. Manipulation of Marriage and Conversion Certificates

Victim's Real Name	Victim's True Age	Victim's Fabricated Name	Victim's Fabricated Age	Age Difference
Huma Younas	14	Mehak	18	+4 Years
Charlotte Javed	13	Ayesha	20	+7 Years
Neha Parvaiz	15	Fatima	19	+4 Years
Myra Shehbaz	14	Maria	18	+4 Years
Saneha Kinza	15	Sobia Fatima	20	+5 Years
Arzoo Raja	13	Arzoo Fatima	18	+5 Years
Mehwish Haroon	13	Ayesha	18	+5 Years
Mehwish Patras	14	Mehwish Fatima	20	+6 Years
Kiran Bashir	16	Ayesha	18	+2 Years
Sunaina James	14	Amna	19	+5 Years
Chashman Kanwal Gulzar	14	Ayesha	19	+5 Years
Riya Kainat	15	Fatima	18	+3 Years
Zarvia Pervaiz	13	Atta Fatima	18	+5 Years
Maha Asif	12	Khadija	19	+7 Years
Naima Javed	15	Haleema	18	+3 Years
Sitara Arif	15	Khadija	18	+3 Years
Angel Robin	14	Zainab	18	+4 Years
Shifa Rafaqat	14	Amina Kaneez	19	+5 Years
Laiba Suhail	10	Laiba	17	+7 Years
Roshni Shakeel	13	Zehra	18	+5 Years
Ariha Pervaiz	13	Ayesha	18	+5 Years
Saneha Asher	14	Fiza Batool	17	+3 Years
Jessica Ishfaq	17	Tayaba Fatima	17	0
Alishba Adnan	14	Fatima	18	+4 Years
Muskan Francis	22	Zehra Ali	22	0

Respondents participating in focus group discussions and stakeholder consultations consistently identified the manipulation of marriage and conversion certificates as a common practice used to legitimize the abduction, coerced conversion, and forced marriage of Christian girls.

A review of documented cases corroborates these observations and reveals recurring patterns of document fraud and identity manipulation.



QUALITATIVE ANALYSIS

The evidence indicates a systematic practice of falsifying the ages of minor girls on marriage certificates. Although the overwhelming majority of documented victims were below 18 years of age at the time of their abduction, their ages were deliberately inflated to portray them as adults eligible for marriage. Among the documented cases reviewed, 92% of girls had their ages increased on marriage certificates, typically to 18, 19, or 20 years, regardless of their actual age. Victims as young as 10, 12, 13, and 14 years were falsely presented as adults. This pattern strongly suggests an attempt to circumvent the Child Marriage Restraint Act and avoid criminal liability for contracting marriages with minors. The fabrication of age also appears intended to create the impression that the marriage was legally valid and based on the free consent of an adult woman.



Respondents further observed that minor girls are routinely portrayed as adults who are capable of independently deciding to convert their religion and contract marriage. By presenting them as adults, perpetrators seek to establish before courts that the girls acted voluntarily and possessed full legal capacity. In practice, however, these marriages are commonly solemnized without the presence of legal counsel, without meaningful judicial scrutiny of consent, and without the knowledge or consent of parents or legal guardians, despite the victims being minors. This practice effectively deprives child victims of the legal protections guaranteed under child protection laws and shifts judicial attention away from the question of whether genuine and informed consent was possible.

Consultation participants also pointed to serious irregularities in the preparation of marriage certificates. Important sections of the certificates are frequently left blank or contain incomplete information, thereby obscuring circumstances that may expose legal violations. Respondents noted that purported husbands of girls are almost invariably described as bachelors, even where credible information indicates that they are already married and have children. Such misrepresentation conceals potential violations of family laws, under which a Muslim man intending to contract a subsequent marriage must obtain the consent of his existing wife or wives and the approval of the relevant Union Council. Omitting these details prevents courts and authorities from fully examining the legality of the marriage and shields perpetrators from accountability for additional offences.

The consultations further revealed that certificates of religious conversion are issued by a wide range of actors without any statutory authority or regulatory oversight. Besides local mosques and religious seminaries, respondents identified political parties and organizations registered as social welfare NGOs as issuing conversion certificates despite lacking any legal mandate to certify religious conversion. The involvement of such entities raises serious concerns regarding the credibility, legality, and evidentiary value of

conversion certificates that are subsequently relied upon in judicial proceedings. The documented cases of Chashman Kanwal Gulzar and Nisha illustrate how organizations operating outside any recognized legal framework have issued certificates purporting to validate religious conversion.

The review of documented cases also demonstrates that changing the victim's name is a routine component of the purported conversion process. 96% of girls were assigned a new Muslim name following the alleged conversion. New names such as Ayesha, Fatima, Khadija, Zehra, Haleema, Amna, Zainab, and Tayyaba appear repeatedly across the cases. Only one victim retained her original first name while still being presented as converted. The compulsory adoption of a new name serves not merely as a symbolic expression of religious conversion but also functions to replace the victim's original religious and cultural identity. In many cases, the issuance of marriage and conversion certificates under the new identity complicates efforts by families and law enforcement authorities to trace the victim and reinforces the appearance that the conversion and marriage were voluntary.

These practices reveal a systematic pattern of documentary manipulation rather than isolated administrative irregularities. The recurring falsification of ages, alteration of identities, omission of legally significant information, and issuance of conversion certificates by unauthorized entities collectively create a documentary narrative portraying abducted minor girls as consenting adult converts. These practices undermine the effective enforcement of child marriage and child protection laws, impede judicial scrutiny of coercion and consent, and facilitate impunity for perpetrators. The consistency of these patterns across multiple documented cases suggests that such practices are not accidental but constitute a recurring mechanism used to legitimize forced conversions and child marriages before administrative and judicial authorities.



CASE STUDY

Neha

16-year-old Neha Faqeer⁸ had been attending sewing lessons taught by the wives of Muslim prayer leader Sajid Ibrahim for six months when she failed to return home one day in March 2026. Hours later, Neha's father Faqeer Masih, a brick kiln laborer, visited the learning center to inquire about his daughter's whereabouts. Ibrahim's wives and Neha's instructors, Ms. Ruqaiya and Ms. Nargis, claimed that they had sent the girl home after classes ended. Masih and his family continued to look for Neha, but decided to approach the local police to ask for their assistance in expanding the search; officers dismissed Masih's concerns and delayed registering an FIR.

Soon thereafter, Ibrahim and his wives, including Ruqaiya and Nargis, who both denied knowledge of Neha's whereabouts, unexpectedly and surreptitiously vacated their residence. The suddenness of the move, and its timing not long after Neha had gone missing, amplified Masih's suspicions that his daughter had been kidnapped by her former tutors. Finally, Masih was able to persuade the police to file an FIR, which identified Muslim leader Ibrahim and his wives as suspects in Neha's disappearance. Nevertheless, no further action was taken as regards the FIR, and Masih was informed that Neha had testified before a Lahore court that she was an adult and had changed faiths and married according to her own wishes.

CASE STUDY

Laiba

In February 2024, Laiba Suhail⁹, a 10-year-old Christian girl from Ikhlāq, Faisalabad, was the target of an abduction plot orchestrated by Muslim man Shaukat Shah, who recruited four non-Muslim abettors to execute his plan: Irfan Masih, Khurram Masih, Aneeqa Masih, and Grace Masih. Knowing that Shah had a nefarious reputation of facilitating similar kidnappings, forced faith conversions, and child marriage, Laiba's father Suhail Masih identified Shah as the probable culprit to local police.

On February 15, the police informed the family that Laiba had submitted an application stating she had embraced Islam of her own free will. Masih rejected this claim, emphasizing that Laiba was only ten years old and incapable of making such a decision independently. Furthermore, his daughter was a weekly participant in her church's Sunday school. Most weekdays, Laiba spent the majority of her time inside the home, taking care of her parents, with Masih having leg injuries and his wife suffering from other health conditions. Laiba's daily routine simply could not accommodate any meaningful interactions with people outside of her family and church community, thereby negating claims that she could have been naturally exposed to other faiths that influenced a genuine religious conversion.

Nevertheless, Laiba's parents were summoned to court, only to be denied the right to speak with Laiba and forced to witness her reaffirm the claims that her faith conversion and marriage were consensual.

Masih strongly suspects that Laiba had been forcibly converted and expressed grave concern that she might be exploited or sold. Despite Shah's notoriety, no one knows for certain what becomes of his victims, with many fearing that they are subjected to sex trafficking.

Application of Relevant Laws by Police

Respondents observed that although access to justice is difficult for many people in Pakistan, minority girls face even greater barriers in cases of abduction, forced conversion, and forced marriage. Police are often reluctant to register complaints, investigate allegations seriously, or apply the most relevant legal provisions. In some cases, local social and religious pressure further discourages police from acting impartially, which creates an environment of impunity for perpetrators.

A common pattern is that the victim's family files a complaint for abduction, rape, or unlawful confinement, while the alleged abductor submits a counter-claim stating that the girl converted and married voluntarily. The girl is then produced before a magistrate and asked to confirm her own consent. Because she often remains under the influence or control of the abductor during the proceedings, her statement may be shaped by fear, pressure, or coercion, leaving her family without an effective remedy.

Respondents also noted that police frequently misuse or underuse the law. They often record the girl's age inaccurately, sometimes as older than she is, and rely mainly on Section 365-B of the Pakistan Penal Code while failing to apply other relevant provisions such as Sections 361, 363, 364-A, 498-B, and the child marriage laws. This selective approach weakens the case, because a minor cannot legally consent to abduction or marriage.

The recorded statement under Section 164 of the Code of Criminal Procedure often becomes decisive. If the girl states that she converted and married of her own free will, police may use that statement to close the case, even when the circumstances suggest coercion. In this way, inaccurate age reporting, selective legal application, and reliance on statements made under pressure combine to disadvantage the victim and her family, while protecting the abductors.

There are, however, a small number of cases in which police departed from this routine practice and invoked more appropriate legal provisions based on the specific circumstances of the offence. For example, six months after the abduction of Yarosha Saleem, police registered an FIR under Section 498-B of the PPC (forced marriage) together with Sections 4 and 5 of the Child Marriage Restraint Act, recognizing both the forced marriage and the victim's status as a child. Similarly, the FIRs concerning the abduction of Maria Shahbaz and Fairy Shoukat were registered under Section 363 of the PPC (kidnapping from lawful guardianship), while an FIR for the abduction of Angel Shoukat was registered under Section 364-A of the PPC, which specifically addresses the kidnapping or abduction of a child below the age of fourteen.

In several other cases, including those of Laiba Suhail, Wardah Emmanuel, Mehak Siddique, and Reena Nazir, the police initially registered the FIRs only under Section 365-B of the PPC. However, following judicial intervention, the investigation was expanded to include Section 376 of the PPC (rape) and Sections 4 and 5 of the Child Marriage Restraint Act, resulting in a more comprehensive legal framework that better reflected the nature of the alleged offences. Likewise, in the case of Naina Ashraf, police registered offences under Section 377 of the PPC (carnal intercourse) together with Section 292-C of the PPC (child pornography) after evidence emerged indicating additional forms of sexual exploitation beyond the initial allegations.

These examples demonstrate that Pakistani criminal law already provides a broader range of legal provisions capable of addressing the multiple offences commonly associated with the abduction, coerced conversion, and forced marriage of minority girls. However, their application remains inconsistent and exceptional rather than routine.

CASE STUDY

Amber

In June 2026, 13-year-old Amber Nadeem¹⁰ was kidnapped while walking to the market from her home in Faisalabad by a man named Mohsin Liaqat, after which the girl's parents Nadeem and Nadia spent three days pleading with local police to file an FIR. During this time, Liaqat was able to swiftly procure an Islamic conversion certificate for Amber as well as documentation of their marriage.

Only after Voice for Justice took up the case did authorities detain Liaqat and transfer Amber to the police branch's protective custody unit for survivors of gender-based violence. Meanwhile, Liaqat's brother intended to secure the perpetrator's release as well as regain custody of Amber. Both parties - Liaqat's brother and attorney, and Amber's family and lawyers - visited the local sessions court with relevant documentation. Liaqat's legal team presented the court with the fraudulent documentation he had acquired prior to his arrest, while the Masih family provided church records listing Amber's age as 13 years. The judge appeared more convinced by Liaqat's legal team, which claimed that, marriage aside, Amber could not return to her Christian family as a Muslim girl lest she commit apostasy. The Masih family representative argued that "the issue before the court was not religion but whether a 13-year-old child has the legal capacity to consent to [religious] conversion, marriage, or a transfer of custody."

The ultimate point that persuaded the court to refrain from sending her back to Liaqat was her testimony that she had been instructed by her abuser's family to claim her birth year was 2008. Amber's disclosure about being coached to provide a false age, in combination with Nadeem and Nadia's marriage registration from 2012, satisfied the court that the girl was a minor if she was born after her parents' nuptials took place.

Despite denying the perpetrator custody of Amber, the magistrate similarly did not return the girl to her family. Instead, he directed the relevant authorities to schedule a medical examination to ascertain the girl's age, only after which would he render a decision on the marriage and disputed custody.

Minorities' Access to Justice & Institutional Response

Respondents observed that minority communities face serious barriers in accessing justice in cases of abduction, forced conversion, and forced marriage of girls. Many such cases are never formally reported to the police because families fear stigma, particularly where abduction is followed by rape. In some instances, community-level dispute resolution mechanisms intervene early, with local leaders pressuring both parties to settle matters out of court, which often disadvantages the victim's family.

Financial constraints also limit access to justice. Pursuing a case requires considerable time, money, legal assistance, and emotional endurance, all of which place a heavy burden on minority families. In addition, families often face intimidation, harassment, and threats from members of the majority community, which discourages them from continuing with legal proceedings.

Respondents further noted that police investigations are often biased and ineffective. Police frequently delay registration of FIRs, fail to apply all relevant legal provisions, and frame such cases as "love marriages" rather than abduction or coercion. In many cases, they present conversion and marriage certificates to the victim's family as proof that the girl has acted voluntarily, even when the surrounding circumstances indicate otherwise. This conduct creates frustration and deepens distrust in the justice system.

The judiciary was also seen as a major barrier to justice. Respondents stated that courts often validate forced conversions and child marriages by relying on religious reasoning rather than on the child-protection laws of Pakistan. In some cases, judges have treated physical appearance as evidence of adulthood or accepted altered marriage documents despite clear signs that the girl is underage. Such decisions not only weaken the legal case but also leave the girl with the abductors or purported husband.



The role of Dar-ul-Aman and other shelter homes was described as particularly troubling. Respondents reported that girls are often pressured to recite the Quran, offer prayers, and give statements in favour of their abductors. Parents are frequently denied meaningful access to their daughters, while abductors are allowed to meet them with official permission, creating an unequal and coercive environment. Once a girl is treated as having "converted," family contact is often restricted on the assumption that parents may influence her to return to Christianity.

Respondents also emphasized that such cases are shaped by a wider social and institutional bias. Minor girls who are abducted and forcibly converted are often celebrated in religious or social circles, while police, judges, and shelter-home officials may encourage them to remain in Islam. Girls are also told that leaving Islam would amount to apostasy, reinforcing the idea that conversion is a one-way process with no real legal or social exit. As a result, many girls remain separated from their families permanently, and perpetrators continue to benefit from impunity.

Judicial Responses & Outcomes

Judicial rulings in cases involving coerced faith conversion in Pakistan have been mixed and, at times, deeply inconsistent. In many instances, courts accept questionable documents produced by perpetrators without adequately scrutinising the age of the victim, the presence of coercion, or the broader circumstances in which the alleged consent was obtained. This results in perpetrators evading accountability under the guise of forged certificates of conversion and marriage.

Regressive Judgments

- In July 2021, the Lahore High Court held that “Undeniably, neither any verse in the Holy Quran nor specific Hadith of the Prophet (PBUH) expressly stipulates a minimum age for conversion to Islam. Hazrat Ali (R.A.) was only 10 years old when he accepted it. However, Muslim Jurists regard the mental capacity of a child as of crucial importance when considering the question of his conversion. Age of discernment is generally reckoned as the age when one attains puberty.”
- On 3 February 2026, the Federal Constitutional Court gave a verdict that awarded custody of 13-year-old Christian girl, Maria, to her abductor or purported husband, effectively validating the child marriage despite documentary evidence of her age mentioned on her birth certificate issued by NADRA, and in disregard of the Punjab Child Marriage Restraint Act and relevant High Court jurisprudence protecting minors from child marriage.

The Court treated Maria’s statement and affidavit as conclusive proof of free consent, and accepted a disputed marriage certificate that misrepresented Maria as an adult, while overlooking possible forgery risks undermining legal certainty, and inviting manipulation in future child marriage cases. Crucially, the Court did not undertake a meaningful,



examination of whether consent of a minor was free, informed, and given without coercion, intimidation, undue influence, or consider the gendered vulnerabilities involved, particularly where the child is in the custody, control, or influence of the alleged perpetrator. The absence of a contextual and substantive inquiry into voluntariness weakens the credibility of the Court’s assessment.

The Court held that a declaration of faith alone is sufficient and that no further inquiry into the genuineness of conversion is ordinarily required, even where the conversion appears to be motivated by marriage. The court presumed that a minor child has possessed the maturity, independence, or legal capacity required to make a life-altering decision under contested circumstances. This approach effectively removes judicial scrutiny from conversion claims in a context where forced conversions are widespread with impunity under religious shield, certificates issued by individuals and organizations are accepted without any legal cover, and where such acts are not explicitly criminalized under domestic law.

The Court’s reliance on the proposition that child marriage may attract penal consequences while remaining legally valid substantially weakens the protective purpose of the intent of the laws for

CASE STUDY

Alina

14-year-old Christian girl Alina Khalid was allegedly abducted from Khanna Pul, Islamabad by one Haider Ali on 24 June 2024.

Following her abduction, Alina was reportedly subjected to forced conversion to Islam and coerced into marriage. Her father, Khalid Masih, registered FIR No. 1066/24 under Section 365-B PPC. She was recovered on 28 July 2024 from Mandi Bahauddin, Punjab, and subsequently placed in the care of the Child Protection Institute. The accused party later filed for custody of Alina, initiating further legal proceedings.

Alina's case is fraught with serious discrepancies regarding her purported age. While her NADRA birth certificate records her as being 14 years old, other documents, including a marriage certificate and medical assessments, postulated a higher age range. These contradictions raise concerns about document authenticity and legal standards in age determination.

Courts relied heavily on Alina's statement before a magistrate in which she claimed to be an adult and consented to religious conversion and marriage. Allegations of coercion and Alina's underage status were not adequately scrutinized by the court, while official records indicating her minority were largely overlooked.

At present, Alina's case remains pending for over one and a half years, underscoring the need for urgent attention. The Islamabad High Court judgment dated 02 October 2024 in Writ Petition No. 2635/2024 poses critical constitutional questions regarding child protection, consent, and fundamental rights.¹¹

setting a minimum age for marriage. Such a distinction separates criminal liability from child protection and allows the very harm the legislation seeks to prevent to produce legal consequences.

The Court placed decisive reliance on "Muhammadan Law" without adequately reconciling it with constitutional guarantees of equality, the protection of children's rights, and minorities' rights. This reflects that the Court adopted a predominantly religion-centric approach, prioritizing Islamic legal principles in a manner that allowed Personal law consideration to override constitutional guarantees and statutory safeguards. Such reasoning risks creating a hierarchy of rights in which vulnerable children receive less protection whenever religion is invoked.

The Court introduced a problematic degree of subjectivity into the determination of age by disregarding official documents such as birth certificates and child registration certificates issued by NADRA and Union Council, which carry greater evidentiary value than a contested marriage certificate. The court rejected official records on speculative grounds, such as the short age gap of eight months between siblings, without seeking an opinion of a media practitioner regarding the age of the victim, and the possibility of early birth in medical science. The court's reliance on physical appearance as an indicator of age further undermines established evidentiary and objective standards and raises questions about consistency and reliability in judicial reasoning.

Overall, the judgment of the Federal Constitutional Court has missed an important opportunity to offer guidelines to inform public policies and lower courts on how to strengthen safeguards for vulnerable children and address future cases involving alleged conversion and marriage of minors. This verdict is likely to have far-reaching implications for the development and coherence of constitutional jurisprudence in Pakistan. This decision could influence future judicial approaches to such cases, potentially weakening protections for minority girls and reinforcing existing vulnerabilities within the legal system.

CASE STUDY

Angelina

Angelina* Arshad, a 14-year-old Christian girl and a student of Class 9, from Okara District in Punjab province, was allegedly abducted on March 25, 2026, forcibly converted to Islam, and raped.

On March 25, 2026, after returning from The Superior Academy School System, Gamber Branch, Okara, Abdul Jabbar invited Angelina to sit in his rickshaw to travel home. Instead, he abducted her with the assistance of his friends. Angelina cried out for help, and the incident was witnessed by passersby Razzaq Masih and Sardar Masih, both from the same village.

The matter was initially brought before a panchayat (council of elders) convened at the residence of Lambardar Chaudhry Tariq Randhawa. Elders from the perpetrator's side verbally promised to return the girl. On April 5, 2026, a representative from the perpetrator's side, Nazar Farid, appeared before the punchayat and claimed that Angelina had embraced Islam but affirmed she would be returned to her parents "at any cost."

Despite this assurance, the family's immediate search efforts in the surrounding areas failed to locate Angelina. A formal complaint regarding Angelina's abduction was filed at Police Station Yousafwala, District Sahiwal, which led to the registration of FIR No. 415/2026 on April 8, 2026, against Abdul Jabbar and others under Section 365-B of the PPC.

Fortunately, Angelina managed to escape captivity on April 9, 2026, and was successfully reunited with her family. In April 2026, she submitted an application to Magistrate Sahiwal, revealing that she had been brutally raped, subjected to death threats, and forcibly held. She requested a medical examination to document the alleged sexual assault.

The complainant, Arshad Masih, formally requested the police to register a criminal case of sexual violence and take legal action against all those involved in this heinous crime.

Later, both parties allegedly agreed to resolve the matter out of court under the influence of key village figures, undermining the justice process and failing to hold the perpetrators accountable. This case highlights concerns about the protection of minor girls, the rule of law, and the potential for impunity in cases involving forced conversion and sexual exploitation of minority girls.

***Real name of the girl has been changed to protect her identity**



Image by [Rahul Pandit](#) on Unsplash

Progressive Judgments

Many verdicts rely on interpretations of Islamic jurisprudence that treat girls who have reached puberty as legally capable of marriage, notwithstanding their minority under statutory child protection laws. In practice, such reasoning results in underage girls remaining in the custody of abductors or purported husbands, while families face significant barriers in securing effective remedies. These outcomes risk weakening the protective purpose of child marriage laws and undermining confidence in equal justice.

At the same time, some important judicial precedents have demonstrated that a rights-based and child-centred approach is both possible and legally sound. Several courts have affirmed that age, legal capacity, voluntariness, and the best interests of the child must be central considerations in cases involving the conversion and marriage of minors.

- The Constitution of Pakistan guarantees religious freedom under Article 20, which protects the freedom to profess, practise, and propagate religion. In its landmark judgment (SMC No. 1 of 2014) issued in June 2014, the Supreme Court of Pakistan affirmed that “religious freedom cannot be interpreted as a right to encourage conversions, but more importantly, should be seen as a right against forced conversions or imposing beliefs on others, because if all citizens have the right to propagate, then no citizen has the right of forced conversion or imposing beliefs on others.”¹²
- The Lahore High Court held that “Pumy Muskan is barely 14 years old. As she is not *sui juris*, she lacks the legal capacity to independently abandon her religion without the consent of her parents or lawful guardian or to change religion on her own. However, the question of faith being a matter of the heart and one’s conviction, no Court can declare her conversion invalid or void. It can only refuse to recognize or give effect to it for certain legal purposes. The Petitioner, being the lawful guardian of Pumy Muskan, is entitled to her custody. There is no reason to deprive her of that right.”¹³

Rather than determining the validity of her religious belief, the Court distinguished between a person's internal faith and the legal recognition of conversion. This reasoning reinforces the principle that constitutional protection of freedom of religion must operate consistently with the legal incapacity of children and the State's obligation to protect them from exploitation.

The Court further recognized that religious conversion is not merely a matter of personal conscience but a decision with profound legal consequences that affect personal status, succession, marriage, custody, and other civil rights. By emphasizing these far-reaching legal implications, the Court rejected the assumption that a child possesses the maturity and independent judgment necessary to make such an irreversible decision. This reasoning places child protection above formal declarations of consent where legal incapacity exists.

The Court reaffirmed that conversion alone does not extinguish the custodial rights of natural parents and that the best interests of the child remain the paramount consideration. The Court recognized that while children possess freedom of thought, conscience, and religion, the exercise of those rights must be guided by their evolving capacities and the legitimate role of parents in providing religious direction. This comparative approach strengthened the constitutional interpretation by aligning domestic law with Pakistan's international obligations.



Progressive Judgments (cont'd)

- In February 2022, the Islamabad High Court held that “A female child below the age of 18 cannot be deemed competent to freely grant her consent to enter into a marriage contract merely because she manifests the physical symptoms of having attained puberty. A marriage contract involving a child under the age of 18 years is a contract prohibited by law, which, even if executed by a child, is void *ab initio*. Neither a child under the age of 18 can consent to engage in sexual conduct in any form, nor can a parent or guardian of a child, contract a child out to engage in sexual conduct under a marriage contract.”¹⁴
- In July 2020 in Mehak Kumari case¹⁵ the Sindh High Court held that there is no prohibition under Islamic law or the law of the land for a converted Muslim woman to reside with her non-Muslim parents, which prevents the separation of children and parents after the alleged faith conversions.¹⁶
- In December 2021, the Sindh High Court ordered an investigation of abductor Ali Azhar (aged 44 years), accused of committing the offence of rape and child marriage of a 13-year-old girl Arzoo Raja.¹⁷ The court further presented Arzoo with the choice to either reside at a shelter home to contemplate over her will until she reaches 18 years of age, or re-join her parents at any time. One year after she started staying in a shelter home, the court issued another order, reuniting Arzoo Raja with her parents rather than her fraudulent husband and directing Arzoo’s parents to let her practice Islam if she so chooses.¹⁸

- In March 2023, the Federal Shariat Court held that prescribing a minimum age for marriage by the State is not contrary to the injunctions of Islam as laid down in the Holy Quran and Sunnah. The Court upheld the relevant provisions of the Sindh Child Marriages Restraint Act, 2013, affirming that fixing an age threshold for marriage falls within the State’s legislative competence and does not violate Islamic principles.
- In October 2021, the Federal Shariat Court ruled that setting a minimum age for marriage under the Child Marriage Restraint Act, 1929 is consistent with Islamic teachings. The Court emphasized that such legal safeguards serve broader social objectives, including ensuring access to education for girls, promoting women’s empowerment, and protecting their physical and mental health. It further noted that marriage in adulthood contributes to greater economic stability, personality development, and intellectual growth.¹⁹

These progressive judgments provide an important legal foundation for reform and guide future jurisprudence built on these principles by prioritising the best interests of the child, rigorous scrutiny of consent, and equal protection for all communities.



GLOBAL STANDING & INTERNATIONAL RESPONSES

Per the Child Marriage Data Portal, maintained by UNICEF’s Division of Data, Analytics, Planning and Monitoring, Pakistan ranks 6th globally with regard to the number of child marriages below age 15, surpassed only by India, Bangladesh, Nigeria, Indonesia, and Ethiopia. Concurrently, Pakistan ranks one lower - 7th place - for marriages under the age of 18 years; higher frequency was recorded in India, Bangladesh, China, Indonesia, Nigeria, and Brazil.²⁰

One encouraging statistic, provided by UNICEF and based on nations’ Demographic and Health Surveys, is that the child marriage prevalence statistic in Pakistan has been steadily declining by an average of 5.25 percentage points every five years (approximately 1.05 per year).²¹

Regarding the linear graph on the following page, of the seven core global regions analyzed by UNICEF, South Asia has seen the largest decrease in child marriage rates over the past decade. Nevertheless, taking into account the fact that many nations in the top ranks for child marriage rates are geographically situated within South Asia - including Pakistan - the region’s overall burden remains second highest as of 2023-24 despite the laudable progress. We have included the rates of Sub-Saharan Africa (the most affected global region) and the World for comparison purposes.

Table 7. Countries with highest rates of child marriage of girls (ranked)

Married by 15 years of age		
Country	Rank	Number of cases
India	1 st	90.5 million
Bangladesh	2 nd	23.4 million
Nigeria	3 rd	10.6 million
Indonesia	4 th	10.2 million
Ethiopia	5 th	8.7 million
Pakistan	6 th	5 million

Married by 18 years of age		
Country	Rank	Number of cases
India	1 st	222.4 million
Bangladesh	2 nd	43.4 million
China	3 rd	36.7 million
Indonesia	4 th	32.1 million
Nigeria	5 th	23.7 million
Brazil	6 th	21.9 million
Pakistan	7 th	20.5 million

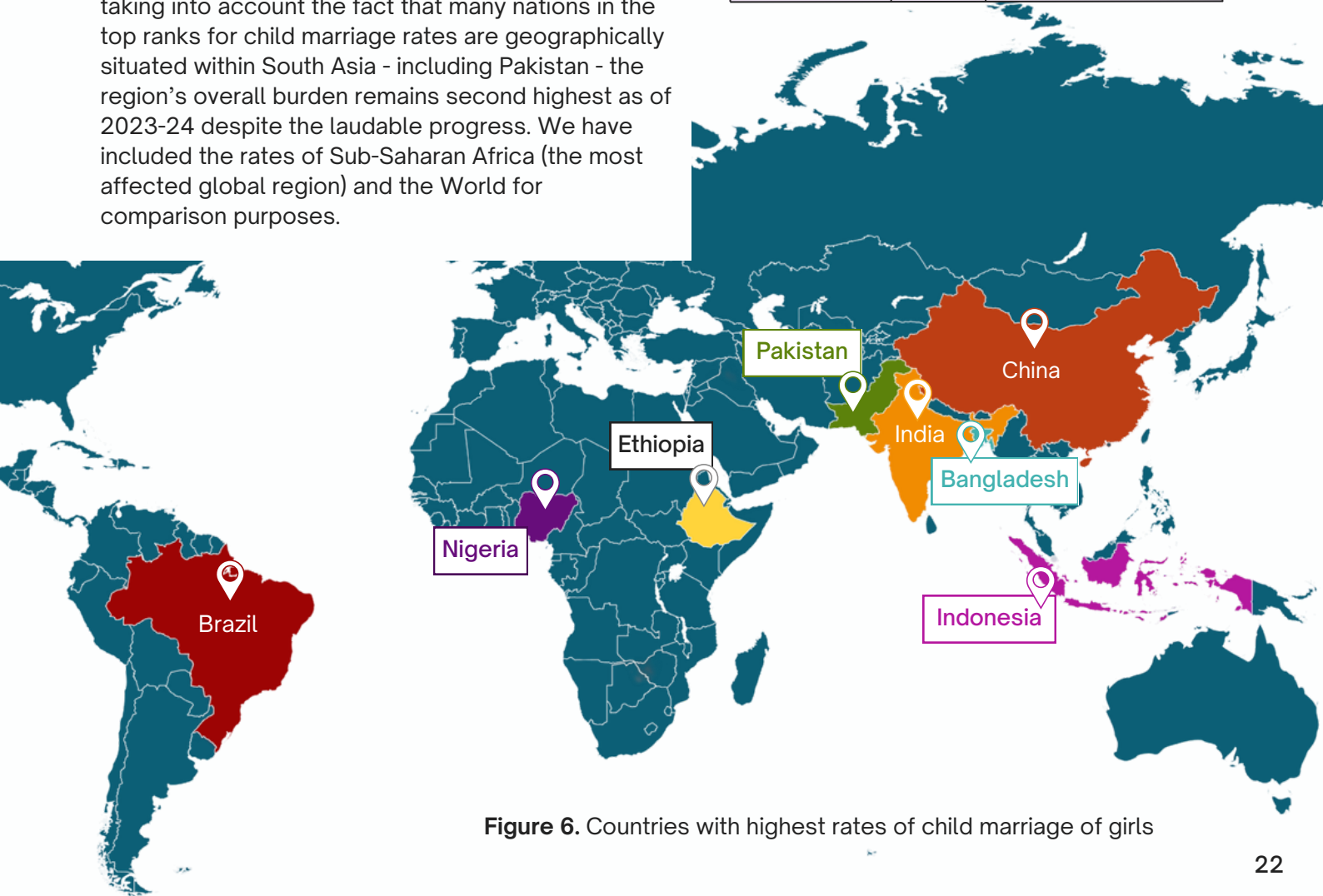
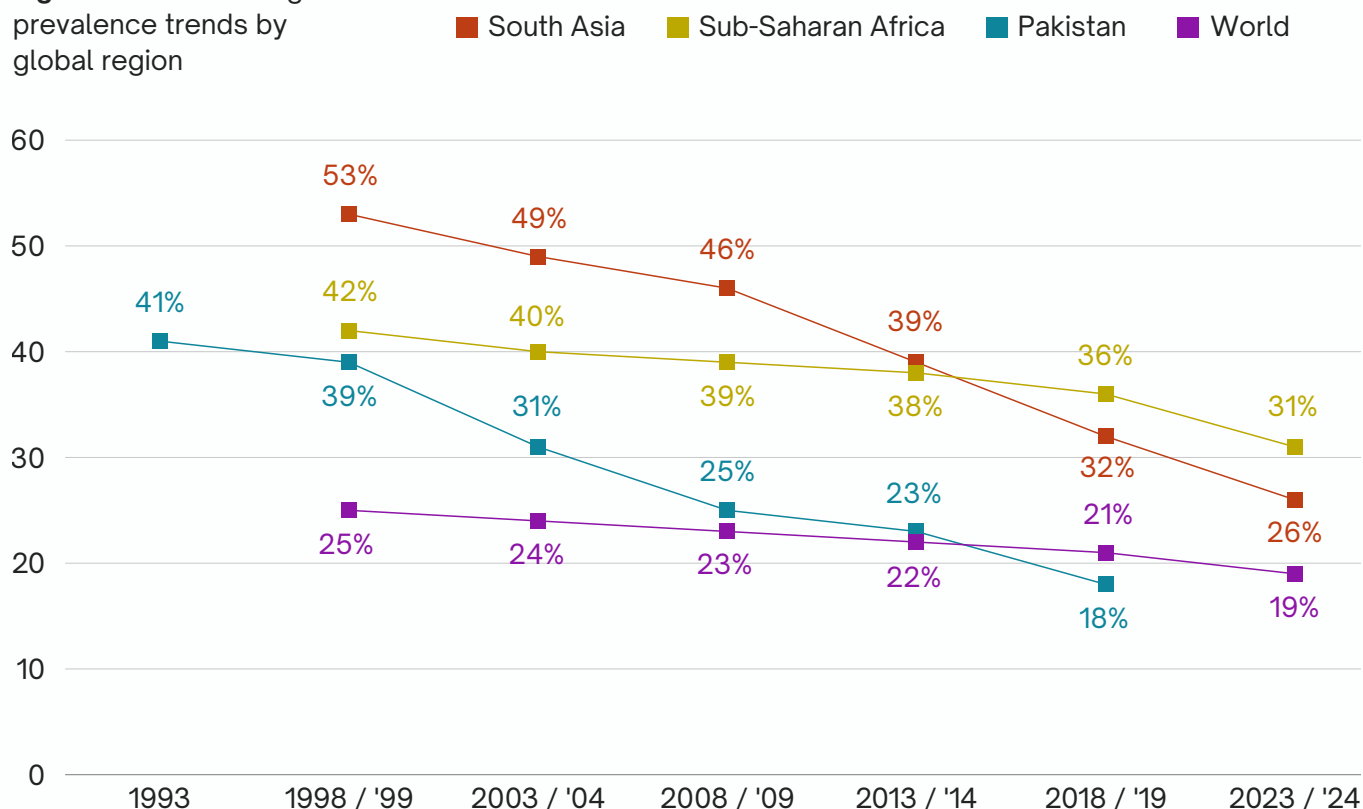


Figure 6. Countries with highest rates of child marriage of girls

Figure 7. Child marriage prevalence trends by global region



CASE STUDY

Sidra

Early one morning in March 2026 in Jaranwala, three men entered the home of father and scrap collector, Afzal Javed Masih, and kidnapped his teenage daughter, Sidra Javed, at gunpoint. Masih, who was at work at the time of the incident, was alerted by family members, after which he visited the local police station to file an FIR. Though authorities registered Masih's complaint, they incorrectly listed Sidra's age as 17 years, rather than 15 years and 7 months as per her birth certificate. Masih, who is illiterate, was not aware of the authorities' mistake - or intentional misrepresentation - until it was dictated to him by a minority rights advocate.

Police inexplicably did not arrest Ali Murtaza, the primary conspirator of the abduction, but instead briefly detained his relatives. After receiving documents alleging Sidra's conversion to Islam and marriage to Murtaza, authorities declined to investigate further, despite inconsistencies. For example, an affidavit signed by Sidra alleged that she was an adult and that she had chosen to accept Islam after being exposed to the faith on social media. Not only is her claim of reaching the age of majority easily disproven, but her family's financial situation has also precluded Sidra from purchasing a smartphone.

The most damning aspect of this case, which should have raised suspicions among authorities regarding Murtaza's character and trustworthiness, is that Masih had already approached the police regarding Murtaza's behavior a year prior. In 2025, Masih observed Murtaza loitering outside his home and, fearing for his safety and that of his elderly parents, wife, and five children, he ordered the man to leave; in response, Murtaza fired shots at the Christian family's residence. Fortunately, no injuries occurred; however, Masih's concern about Murtaza fell on deaf ears, as authorities refused to apprehend Murtaza for harassment.²²

To illustrate **Pakistan**'s decrease in child marriage rates, we compare it below to the statistics of **Afghanistan**, **Bangladesh**, and **Nepal**. Pakistan's most recent numbers were recorded in 2018, therefore we selected comparison countries that had statistics published that same year. In the interest of full transparency, however, we additionally include the most recent statistics of Afghanistan, Bangladesh, and Nepal, as the current child marriage rate in each country has continued to decline since 2018. We look forward to the release of Pakistan's post-2020 numbers whenever that may be.

The issue of coerced faith conversion in Pakistan has attracted sustained international concern and forms part of a broader assessment of the country's human rights record. Governments, United Nations mechanisms, and international partners have repeatedly called for stronger protections for religious minorities, particularly girls at risk of child marriage, sexual violence, and coercion. In 2022, seven United Nations Special Procedures mandate holders sent a joint communication to the government of Pakistan, expressing concern about the abductions, forced conversions, and marriages of Mehwish Patras, Chashman Kanwal, Zarvia Pervaiz, and Saba Nadeem.

On April 11, 2024, UN human rights experts urged Pakistan to harmonize its laws by establishing a uniform legal age of marriage at 18 years for

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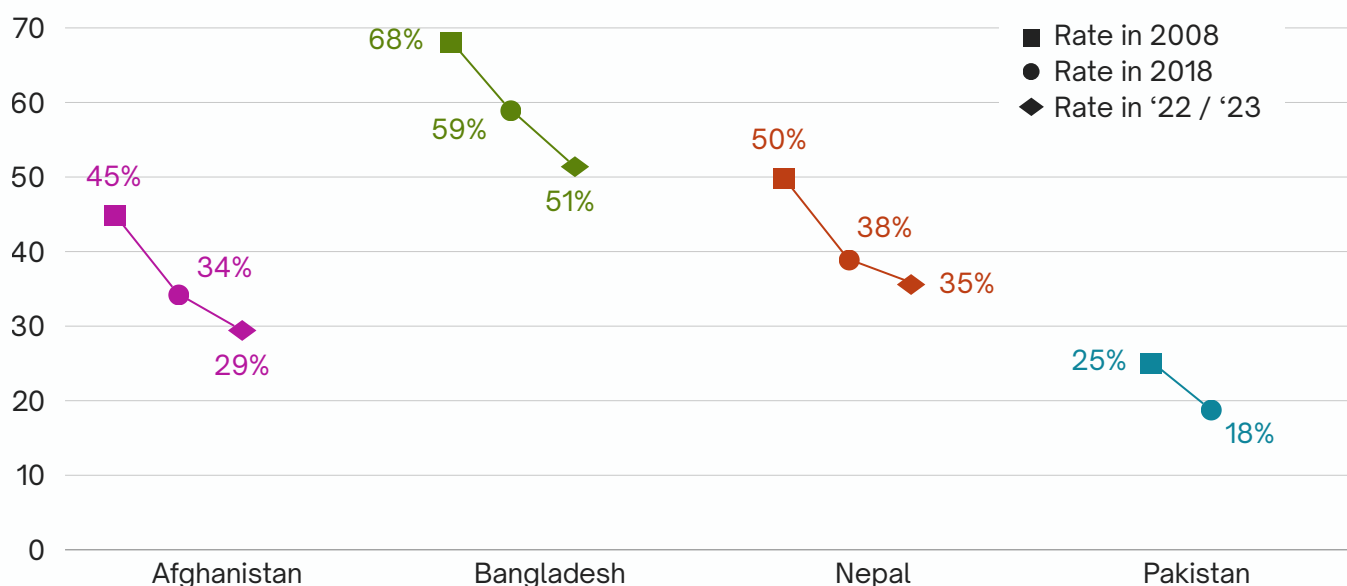
*If the above allegations prove to be accurate, they would be in contravention of victims' rights to liberty and security of person, to freedom from slavery and servitude, freedom from torture and other forms of inhuman treatment, protection against trafficking for purposes of forced marriage, domestic servitude and sexual exploitation, freedom to enter marriage only on the basis of their free and full consent, to freedom of thought, conscience and religion, to equal protection of the law without any discrimination, to freedom from arbitrary interference with their privacy, family, home or correspondence, and in the case of underage victims, additionally to education.*²³

”

both males and females nationwide. They emphasized the necessity for enhanced legal protections to shield girls from minority communities, particularly Christians and Hindus, from forced religious conversions, abductions, and child marriages.²⁴

Courts frequently validate forced marriages and conversions of minors by citing religious law, which often results in victims being denied reunification with their families. They highlighted

Figure 8. Child marriage prevalence trends, South Asia



with their families. They highlighted that perpetrators commonly evade justice, with authorities dismissing such offenses as purported "love marriages." The experts stressed that child, early, and forced marriages cannot be justified on religious or cultural grounds, and under international law, consent is irrelevant for victims under 18.

In April 2026, UN experts²⁵ once again reiterated their disapproval of Pakistan's inadequate response to reports of forced religious conversion and child marriage. While most cases involving Christian girls take place in Punjab province, the UN experts provide some additional context, noting that Sindh province is the backdrop of incidents involving Christian and Hindu minors alike. Citing recent statistics, the experts note that Christian minors make up 25% of victims and that certain other characteristics are common among targeted girls, notably being aged between 14 and 18 years and being from an impoverished background.

“

Any change of religion or belief must be genuinely free from coercion, and marriage must be based on full and free consent, which is not legally possible when the victim is a child.... These women and girls endure a continuous sense of terror, face coercion, and are deprived of their freedom of religion or belief and autonomy under patriarchal and political pressures.

”

The United Nations Special Rapporteurs' written statements and oral remarks reaffirm already long-standing and widely agreed precedents. UN Treaty Bodies, the core mechanisms whose monumental task is to interpret the very documents establishing the international human rights landscape, have made endless calls over the years to Pakistan to adopt and strengthen its institutional measures, legal framework, and enforcement mechanisms; criminalize coerced faith conversion; ensure impartial investigations; prosecute perpetrators; and guarantee equality and religious freedom for all minorities. These recommendations have been made by the Committee on the Elimination of Racial Discrimination (CERD), the Human Rights



Committee, and the Committee on the Rights of the Child (CRC).²⁶ Individual Member States of the UN continue to echo this feedback. During Pakistan's 4th Universal Periodic Review in 2023, several Member States, including Poland, Finland, Greece, Mexico, and India, recommended that Pakistan take concrete legal and institutional measures to criminalize and prevent forced conversions of minorities.²⁷ Outside of the UN context, some nations are more assertive in their response to Pakistan's human rights violations. Since 2018, the United States has annually renewed its designation of Pakistan as a Country of Particular Concern for engaging in, or tolerating, severe violations of religious freedom.²⁸ Across the pond, the United Kingdom sanctioned Muslim cleric Mian Abdul Haq of the Bharchundi Sharif shrine in Ghotki, Sindh, for his culpability in forced conversions and marriages of minority girls and women in Pakistan.²⁹

The European Union in 2021 and 2026 adopted resolutions that each addressed the misuse of blasphemy laws and the alarming pattern of coerced faith conversions affecting religious minorities, especially Christians and Hindus. Increasingly over the past few years as well, the EU has been reconsidering its conferral of GSP+

trade incentives and tariff relief upon Pakistan; the country continues to fall short of implementing 27 core international human rights conventions, a precondition for GSP+ designation. The EU's assessment reports express dismay about Pakistan's persistent shortcomings in the preservation of religious freedom and minorities' rights, including protections against coerced faith conversions, abuse of blasphemy laws, and mob violence against marginalized populations.³⁰

CASE STUDY

Aneeqa

14-year-old Aneeqa Fiaz was abducted by 38-year-old Muhammad Aslam Talib, two days before Christmas 2025. The girl's parents filed an FIR at a police station in Sadar, Sheikhupura, petitioning for the rescue of their daughter and the prosecution of Aslam for kidnapping with the intent of contracting marriage with a minor.

At the Lahore High Court hearing, Judge Tariq Saleem Sheikh reviewed the NADRA-issued birth certificate listing Aneeqa's age as 13, effectively disproving Aslam's claim that his 'wife' was an adult. Per the Child Marriage Restraint Act, Judge Sheikh declared the union nugatory, ordered the immediate release of Aneeqa to the custody of her parents, and commanded the arrest of Aslam. Notably, Judge Sheikh explicitly reaffirmed Pakistan's obligation to protect children, especially those from vulnerable communities, for example, faith minority groups. Moreover, he concluded that any act of coercion or deception negates claims of consent.

The case has now been transferred to the jurisdiction of the Sheikhupura District and Sessions Court, which will issue a judgment regarding Aslam's criminal activity based on a recorded statement provided by Aneeqa.³¹



CASE STUDY

Sataish

In February 2026, 14-year-old Sataish Mariam disappeared from her home in Sahiwal one evening while her family was asleep, causing her father, Basharat Masih, to frantically search the neighborhood for the missing girl. Multiple neighbors and community members told Masih that they had witnessed Sataish being driven away in a nondescript white vehicle by 26-year-old Ali Haider and two accomplices. Having already filed an FIR with local police, Masih returned after learning these new details and clearly identified Haider as the likely culprit. Yet, the authorities evidently disregarded Masih's updated information and declined to take action and rescue Sataish, because just a few days later, they told the father that Sataish had converted to Islam and married Haider, twelve years her elder. Masih expressed his bewilderment about the situation; Sataish rarely left her home. Although she had been a promising seventh-grade student, she had to unenroll from school and help care for her ill mother, a role that kept her at home most days.

Over the next six days, the police made numerous blunders. Despite receiving marriage and faith conversion documents and being aware of the girl's status as a minor, they added no additional charges to the original FIR. Kidnapping, child marriage, and forged legal documentation are all codified in penal provisions; however, Haider remained at large, allowing him more time to harbor his child bride without repercussion.

Furthermore, to ensure he evaded accountability, Haider - joined by some of his friends and relatives - visited Masih's home armed and attempted to pressure the family to retract their FIR by threatening them with violence. Sataish's father refused to relinquish his efforts to rescue his daughter. He even filed an additional complaint regarding this specific incident of trespass

and intimidation, but authorities once again made no arrests. The most deplorable misjudgment on the police's part, according to Masih, was their alleged facilitation of the recording of a false statement by Sataish that she had willfully converted and married. The magistrate reprehensibly accepted this misleading, false testimony without investigation, while simultaneously discounting Sataish's birth certificate as presented by her father. As a result, Masih watched as his teenage daughter was released into the custody of a man nearly twice her age.

Sataish's parents are understandably devastated, and her already sick mother is deteriorating from the additional emotional anguish. They are, however, hopeful that Christian lawyer, Hanif Hameed, will succeed in petitioning for a revised FIR including new charges under the new Punjab Child Marriage Ordinance of 2026.³²

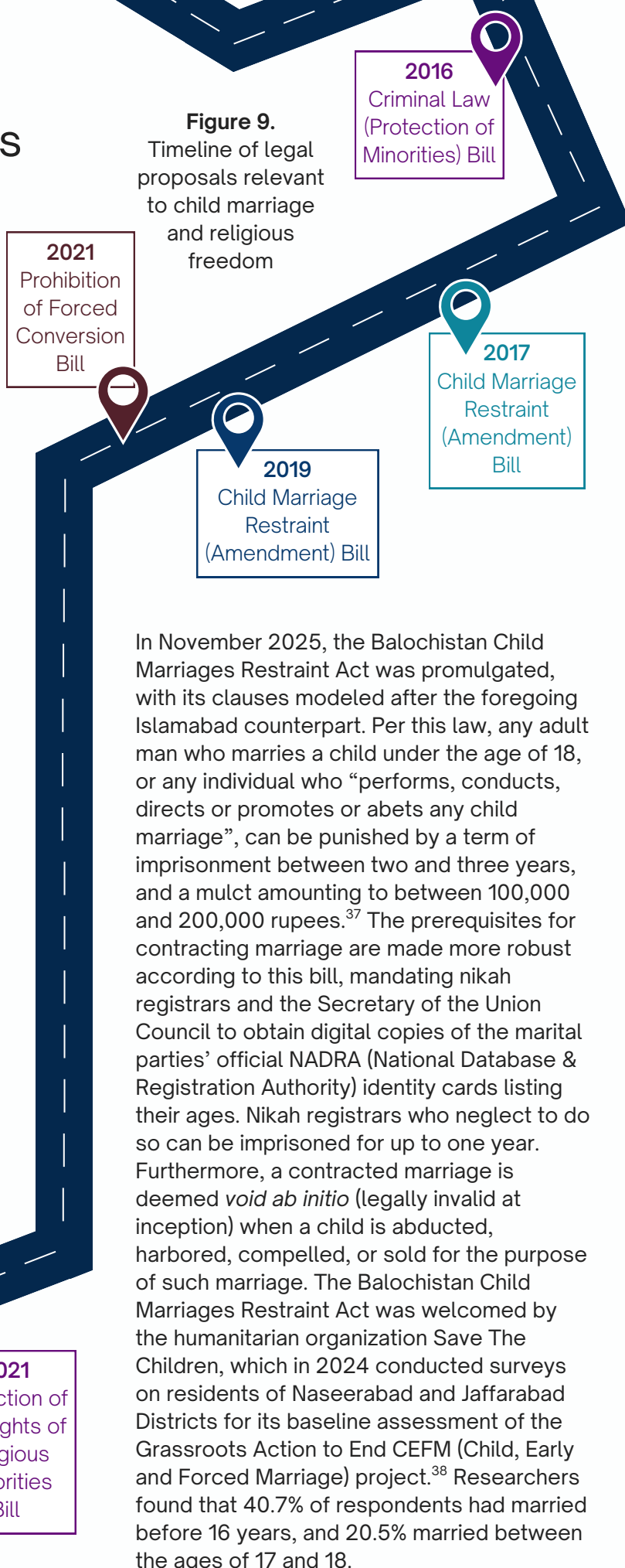


CHILD MARRIAGE LAWS: Progress & Challenges

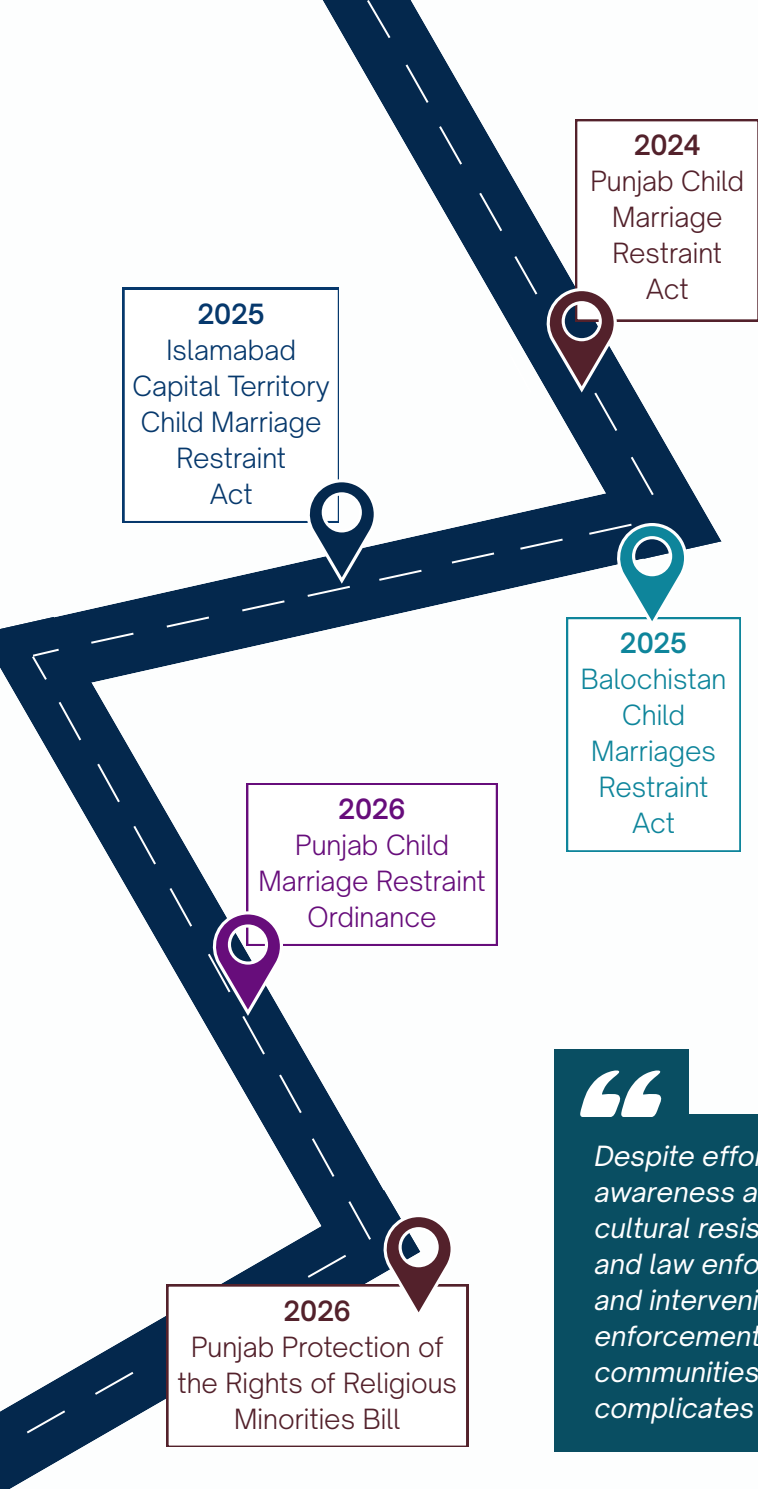
The legal framework on child marriage in Pakistan remains provincially fragmented. In most parts of the country, the minimum legal age of marriage is 16 years for girls and 18 years for boys, as stipulated under the 1929 Child Marriage Restraint Act.³³ Sindh was the first province to implement its own regional bill on the harmful practice; the 2013 Sindh Child Marriages Restraint Act was unprecedented and predated other regional laws by a decade. In an even more religiously contentious era ten years ago, the legislation withstood opposition from radical Islamic entities and was passed by the Provincial Assembly.³⁴

In May 2025, Pakistan's National Parliament passed the Islamabad Capital Territory Child Marriage Restraint Act, setting 18 as the minimum marriage age for both girls and boys, despite objections from the Council of Islamic Ideology.³⁵ The bill additionally sets a term of imprisonment not exceeding one year, as well as a fine, for registering *nikahs* (Islamic marriage contracts) involving spousal parties under the age of majority. Adult males found guilty of marrying minor girls are liable to a maximum three-year prison sentence. Notably, the law identifies stringent penalties - between three and seven years' imprisonment - for the crime of child trafficking, comprising elements such as "inducement", "force", "coercion", "enticement", "persuasion", or "compulsion" to "recruit", "harbor", "transport", or "obtain" a child for the purpose of contracting marriage.³⁶

Figure 9.
Timeline of legal proposals relevant to child marriage and religious freedom



In November 2025, the Balochistan Child Marriages Restraint Act was promulgated, with its clauses modeled after the foregoing Islamabad counterpart. Per this law, any adult man who marries a child under the age of 18, or any individual who "performs, conducts, directs or promotes or abets any child marriage", can be punished by a term of imprisonment between two and three years, and a mulct amounting to between 100,000 and 200,000 rupees.³⁷ The prerequisites for contracting marriage are made more robust according to this bill, mandating *nikah* registrars and the Secretary of the Union Council to obtain digital copies of the marital parties' official NADRA (National Database & Registration Authority) identity cards listing their ages. *Nikah* registrars who neglect to do so can be imprisoned for up to one year. Furthermore, a contracted marriage is deemed *void ab initio* (legally invalid at inception) when a child is abducted, harbored, compelled, or sold for the purpose of such marriage. The Balochistan Child Marriages Restraint Act was welcomed by the humanitarian organization Save The Children, which in 2024 conducted surveys on residents of Naseerabad and Jaffarabad Districts for its baseline assessment of the Grassroots Action to End CEFM (Child, Early and Forced Marriage) project.³⁸ Researchers found that 40.7% of respondents had married before 16 years, and 20.5% married between the ages of 17 and 18.



One legislation stands apart and warrants explicit mention. The Christian Marriage Amendment Act, passed in the Senate in 2023 and the National Assembly in 2024, and signed by President Zardari, raises the minimum age for marriage to 18 years.⁴¹ Though commendable, this bill's applicability is demographically exclusive to Christian citizens. As such, it raises concerns about its protective capacity for Christian girls who are abducted and 'converted' to Islam preceding underage marriage.

Notwithstanding the above legislative measures, enforcement remains weak. Deeply entrenched cultural norms, poverty, lack of education, and gender-based inequalities continue to drive child marriages. Moreover, legal loopholes and the frequent invocation of religious interpretations often undermine statutory protections, enabling perpetrators to evade accountability. In the afore-mentioned baseline assessment, Save the Children also canvassed the Sindh districts of Jacobabad and Khairpur, observing that ten years after the promulgation of the 2013 Sindh Child Marriages Restraint Act, the results leave much to be desired:

“

*Despite efforts by local NGOs and government agencies to raise awareness about the law, enforcement remains weak due to cultural resistance and lack of resources. Local administrations and law enforcement often struggle with effectively monitoring and intervening in child marriage cases, resulting in sporadic enforcement. Authorities frequently face resistance from communities that adhere to traditional practices, which further complicates the implementation of the law.*⁴²

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In February 2026, the Punjab Child Marriage Restraint Ordinance was enacted forthwith, raising the minimum age of marriage in the province to 18 years irrespective of gender.³⁹ Bar a few differences in penalty fines prescribed for the crime of marrying a child or solemnizing a child marriage, most of the bill's provisions align with its counterparts in Islamabad and Balochistan, including classifying underage marriage as a cognizable, non-bailable, and non-compoundable offense. Unsurprisingly, after just a few months in effect, it was challenged by Mufti Muhammad Aslam, who filed a petition at the Federal Shariat Court claiming that “criminalizing marriages involving individuals under the age of 18 was contrary to Islamic teachings”.⁴⁰

Only 30.7% of adult respondents were aware that there was a law on CEFM, and some who were aware of the law's existence did not have a specific understanding of what constitutes CEFM and what penalties violators face.⁴³ More children (43.8% of boys and 40.6%) responded that they were aware of the legislation, as would make sense considering that they encounter the topic - albeit superficially - in school curriculum, whereas their parents' generation did not.⁴⁴ Only 19.8% of female respondents knew how to access complaint mechanisms. This persistent gap between law and practice underscores the urgent need for uniform legislation, robust enforcement mechanisms, and community-level awareness initiatives to safeguard vulnerable children.

CASE STUDY

Diana

Diana* Yousaf, a 14-year-old girl from Sambrial Tehsil in Sialkot District, Punjab Province, was abducted on January 25, 2025, by Muhammad Anees and four accomplices while she was out purchasing groceries. She was taken to Gujrat District, where she was forcibly converted to Islam, coerced into marriage, gang-raped by five individuals, and impregnated due to repeated sexual assault over a period of five months.

Diana's father, Yousaf Masih, works as a laborer at a local brick kiln. On January 27, 2025, he reported his daughter's abduction and registered FIR No. 285/25 under Section 365-B of the PPC at Police Station Sambrial.

Fabricated certificates of conversion and marriage were issued in the Gujrat District to conceal the crimes of abduction and rape. The documents falsely stated that Diana had contracted Nikah (marriage) on January 17, 2025, and converted to Islam on January 18, 2025, when she was actually at home in Sambrial with her family. The marriage form fraudulently recorded her age as above 18 years, deliberately circumventing the Child Marriage Restraint Act. These antedated documents, issued four days before Diana's abduction, were part of the perpetrators' tactic to use the Nikahnama (marriage certificate) as a legal shield to evade accountability.

Yousaf Masih filed a petition under Article 199 of the Constitution of Pakistan in the Lahore High Court seeking the recovery and production of his minor daughter. The court ordered the police to present Diana before the court and arrest the suspects.

Police recovered Diana during a raid and arrested the accused. She was presented before the Lahore High Court on May 6, 2025. The court ordered three accused individuals, including the primary suspect Muhammad Anees, to be placed in judicial remand, while two suspects remain at large. The court

directed that Diana be sent to a government shelter home for women in Sialkot District for rehabilitation. Medical personnel at the shelter discovered that Diana was four months pregnant as a result of repeated rape by perpetrators.

Diana recorded her statement before the court, declaring that she was gang-raped by five individuals and had neither embraced Islam nor entered into any marriage. Following her statement, the police invoked Section 375-A of the PPC in the FIR to include an offence relating to gang rape.

On May 21, 2025, Diana recorded her statement before Sambrial Judicial Magistrate Khurshid Ahmad, in which she expressed her desire to be placed in the custody of her parents. The court ordered Diana to reunite with her parents five months after her abduction.

On June 6, 2025, Yousaf Masih filed a suit for jactitation of marriage in the Family Court, Sambrial, seeking a declaration that Diana's marriage to Muhammad Anees was invalid. On October 16, 2025, Judge Obaid Hassan Gondal issued a decree declaring the marriage dissolved.

This case represents a horrifying instance of sexual exploitation targeting underage minority girls, carried out under the deceptive cover of fraudulent faith conversion and forced marriage to obscure criminal accountability and evade justice. It underscores that even when justice is pursued and partially achieved, it can never fully erase the scars inflicted upon the soul or restore the dignity of survivors of sexual violence.

***Real name of the girl has been changed to protect her identity**

CASE STUDY

Nayab

Nayab Shahid Gill, a 13-year-old girl, was studying in Grade 6 at school in Gujranwala. She used to work at a salon owned by a Muslim man, Saddam Hayat, a father of four children. He kidnapped, forcibly married, and converted her on 20 May 2021. She was tortured and forced to sign documents. She had been threatened with firearms before every court appearance, forcing her to give statements in favor of her captors.

On 1 July 2021, Nayab, accompanied by a dozen members of Hayat's family, was presented in the court in police custody, and forced to make a statement that she was 19 years old and she had converted to Islam and married Hayat of her free will. Her parents' appeal to have their daughter's custody was rejected by the Lahore High Court, which issued an order to send Nayab with Saddam Hayat, refusing to acknowledge the official birth documents they produced, which confirmed that she was a minor, and instead the court accepted her claim that she was an adult.

In August 2021, a petition with the Supreme Court was filed against the LHC's decision, which remained pending for two years. In 2023, Saddam Hayat was arrested by the police in a case involving violence against her first wife, which made Nayab escape from her captors and reunite with her father, Shahid, and mother, Samreen. Her family had to relocate to another city to protect her from perpetrators of violence. On reuniting with family, she revealed that she at first refused to return home or convert back to Christianity out of fear for her and her family's safety. She took several months to come out of the trauma she faced during her captivity, and is now pursuing her education in school.

Nayab resumed his education despite challenges, and she aspires to become an empowered woman.⁴⁵

PSYCHOSOCIAL IMPACTS

The abduction, forced conversion, and child marriage of minor girls constitute severe forms of trauma with multidimensional psychosocial consequences. From a clinical and psychosocial perspective, these experiences significantly disrupt typical developmental trajectories.



Stigmatization & Marginalization

Survivors frequently experience social dislocation and stigmatization, which impedes reintegration into their families and communities. Stigma associated with sexual violence, forced marriage, and religious conversion often results in secondary victimization, where survivors are perceived as socially "tainted" or excluded. This process weakens social support systems, which serve an essential protective function in trauma recovery and contribute to chronic social isolation.

Additionally, repeated exposure to institutional failure, particularly delayed or inadequate responses from law enforcement and judicial systems, erodes institutional trust. This can lead to learned helplessness, a psychological condition in which individuals perceive themselves as powerless to influence outcomes, further compounding vulnerability and disengagement from formal support mechanisms.



Psychological & Clinical Outcomes

Empirical evidence from trauma psychology indicates that survivors of abduction and sexual coercion are at high risk of developing Post-Traumatic Stress Disorder (PTSD), Major Depressive Disorder (MDD), and Generalized Anxiety Disorder (GAD). Common symptom clusters include:

- Intrusive memories, flashbacks, and sleep disturbances
- Hyper-vigilance and persistent fear of re-traumatization and secondary victimization
- Emotional dysregulation, such as agitation, irritability, apathy, dysthymia, and withdrawal
- Persistent feelings of shame, guilt, and diminished self-worth



Image by ILO Asia-Pacific on Flickr (CC BY-NC-ND 2.0)

CASE STUDY *Jessica*

Jessica Ashfaq, a 16-year-old Christian girl from Faisalabad, was abducted on 7 April 2025 by Nouman Nadeem and his two accomplices when she was on the way back from school, where she is a student of Grade 9. Subsequently, she was coerced into a religious conversion and marriage against her will. Jessica's father, Ashfaq Masih, filed an FIR (1040/25) under Section 365-B of PPC. The authorities have failed to reunite her with her parents, overlooking official birth registration documents, in total disregard of the Child Marriage Restraint Act.



Developmental Disruption & Stagnation

The majority of affected individuals fall within the 13–18 age group, an already turbulent and dynamic period of development for adolescents. Trauma incurred during this critical time in a youth's life can result in

- Distorted self-concept and impaired identity formation
- Long-term avoidant/reclusive behaviors and difficulty establishing trust-based attachments to and relationships with others
- Susceptibility to prolonged, or lifelong, mental health problems



Family Turmoil

The impact extends beyond survivors to their families, who often experience collective trauma. Parents commonly report symptoms consistent with chronic stress, anxiety disorders, and depressive states, driven by feelings of guilt, helplessness, and fear for the safety of other children.

Social pressures and stigma may compel families to relocate or withdraw from community engagement, leading to fragmented social networks and reduced access to informal support systems. This contributes to broader family system destabilization.



Intergenerational Consequences

The convergence of social exclusion, psychological trauma, and institutional inadequacy creates conditions for intergenerational vulnerability. Persistent marginalization reinforces cycles of poverty, limited access to education, and reduced social mobility.

At a broader level, these dynamics contribute to heightened intergroup tensions and undermine social cohesion, particularly in contexts where minority communities already face structural discrimination. The psychosocial impact of these violations is profound, enduring, and multidimensional. Addressing these harms requires trauma-informed, survivor-centered interventions that integrate mental health services, social reintegration strategies, and institutional accountability. Without such measures, the long-term psychological and societal consequences will continue to impede recovery and perpetuate cycles of vulnerability.



Image by Sarah Naqvi on Flickr (CC BY-NC-ND 2.0)

MARIA SHAHBAZ CASE TIMELINE⁴⁶

29 July 2025

13 y.o. Maria Shahbaz (Bibi) fails to return home after breakfast

30 July 2025

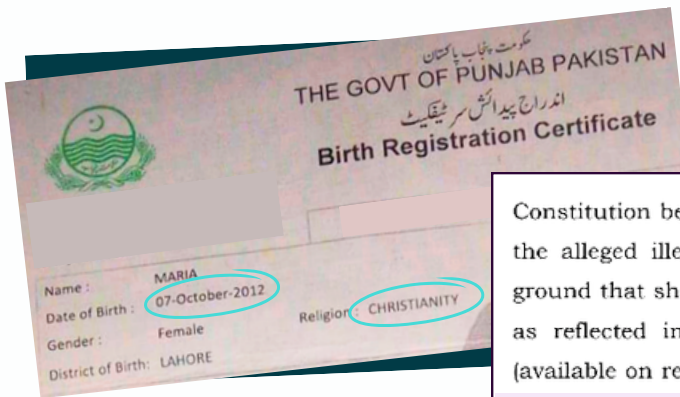
Her father, Shahbaz Masih, files FIR No. 5144/2025 in Lahore, alleging that she was abducted

31 July 2025

Maria records a statement announcing her willful marriage to a man named Shaheryar Ahmad in front of Model Town Judicial Magistrate Hassan Srfaraz Cheema

21 August 2025

Masih cites Constitutional Article 36 (protection of minorities) and Article 199 in his writ petition to the High Court



Excerpt:

Constitution before the High Court for the recovery of his daughter from the alleged illegal and unlawful custody of respondent No. 6, on the ground that she is a Christian and her exact date of birth is 07.10.2012, as reflected in her birth certificate and child registration certificate (available on record). Thus, she, at the time of her alleged marriage, was only twelve years, nine months, and twenty days old, and, therefore, she, being a minor, could not have lawfully contracted marriage with anyone. The High Court dismissed this petition vide order dated 25.08.2025.

25 August 2025

The High Court dismisses Masih's petition after just four days, neglecting to pursue an investigation into the circumstances surrounding Maria's disappearance. In response, Masih revises his petition and evokes a writ of habeas corpus, which would require an examination into the legality of Ahmad's custody of Maria.

Excerpt:

revision petition before the Sessions Judge, Lahore. During the course of the hearing of the said revision petition, a Secretary, Union Council, appeared in person and disowned the due execution and registration of the *Nikahnama* of the petitioner's daughter with respondent No. 6 in his Union Council. On this basis, the revisional court disposed of the matter with a direction to the Investigating Officer to incorporate these facts

9 October 2025

The Additional Sessions Judge of Lahore again dismisses Masih's petition:

"It has been observed by the Revisional Court that the nikahnama of Maria Bibi with Shehriyar was unregistered and forged. However, in this petition...such [a] question cannot be determined or decided..."

Masih appeals the decision once more, this time in front of the Lahore High Court, but...

17 October 2025

The Lahore High Court dismisses this appeal





3 February 2026

The Federal Constitutional Court **hears arguments from parties**, summarized as follows:

Petitioner: Shahbaz Masih,
father of Maria Bibi

➤ **Regarding the legality of marriage:** The Secretary of the Union Council has already declared the girl's *nikahnama* null and void, and it should therefore be discarded.

➤ **Regarding age discrepancies:** Documentation of Maria's age, namely the NADRA birth certificate, holds evidentiary value of her status as a minor, thereby refuting her claim to the contrary in court.

➤ **Regarding the contested custody:** That Maria is confirmed to be under the age of majority, and that her marriage is unrecognized by religious clerics, Ahmad's custody of the girl constitutes unlawful detention.

The learned counsel for the petitioner argued that the impugned orders of the High Court and the ASJ are illegal, resulting from misreading and non-reading of the material on record. The alleged marriage of the petitioner's daughter with respondent No. 6 is *ex facie* void, as she, being a Christian and a minor at the relevant time, could not lawfully contract marriage with the respondent No.6, a Muslim, under law, i.e., the Child Restraint Marriage Act. The purported *Nikahnama* is forged, a fact corroborated by the Secretary of the Union Council, who disowned its execution and registration. The statement of the minor recorded under section 164, Cr.P.C., cannot override documentary evidence of her age or validate an otherwise void marriage.

The custody of a minor girl by a person claiming marriage under a void and unregistered *Nikahnama* amounts to illegal detention and also violates the fundamental rights guaranteed under Articles 4, 9, 25, and 36 of the Constitution; however, the courts below erred in dismissing the petitions for her recovery without considering this important aspect of the matter.

Respondent: Shaheryar Ahmad, self-proclaimed husband of Maria Bibi

➤ **Regarding the legality of marriage:** Maria's recorded statement that her marriage to Ahmad was consensual sufficiently proves that it is both lawful and of mutual agreement between the spousal parties.

➤ **Regarding age discrepancies:** Maria's NADRA-issued birth certificate and B-Form are not certified as authentic and therefore should not be admissible in court.

➤ **Regarding the contested custody:** As Ahmad's wife, Maria cannot be considered unlawfully detained.

➤ *Habeas corpus* relief, as outlined in the Code of Criminal Procedure, is not applicable in cases of marital disputes.

The learned counsel for respondent No. 6 contends that the present petition is misconceived, frivolous, and an abuse of the process of law. The alleged *detenue* is not in unlawful custody, as she voluntarily married respondent No. 6 and recorded her statement under section 164, Cr.P.C., affirming her free will and consent. Such a statement carries significant evidentiary value, which cannot be lightly disregarded. The exact age of the girl is a disputed question of fact, which cannot be conclusively determined in summary proceedings under section 491, Cr.P.C., or constitutional jurisdiction. The petitioner's reliance on the birth certificate and Form-B is misplaced, as their genuineness can only be examined through a proper trial. Allegations regarding the execution or registration of the *Nikahnama* relate to investigation and do not justify habeas corpus relief. The revisional court only directed the Investigating Officer to record certain facts and made no finding of forgery or illegality against respondent No. 6. The proceedings under section 491, Cr.P.C., are not intended to decide matrimonial disputes or complex questions of fact.



3 February 2026 (cont'd.)

Federal Constitutional Court **makes final judgment**, summarized as follows:

On faith as it relates to marriage

From the above discussion, there remains no iota of doubt that a Muslim male can lawfully marry a Christian female. The question that now arises is whether such a marriage can be solemnized and registered under the Muslim Family Laws Ordinance, 1961 (the 'Ordinance'). The answer to this question is clearly in the negative, as the Ordinance applies only to Muslim citizens of Pakistan (see sec. 1(2) of the Ordinance). However, with respect to this question, the learned counsel for respondent No.6, in the presence of Mst. Maria Bibi, argued that she is no longer a Christian as she had converted to Islam even before the solemnization of the marriage. The marriage, as such, was legally solemnized between two Muslims under the Ordinance.

Our analysis:

In its reasoning on conversion, the Court held that a declaration of faith alone is sufficient and that no further inquiry into the genuineness of conversion is ordinarily required, even where the conversion appears to be motivated by marriage. This approach effectively removes judicial scrutiny from conversion claims, which is particularly troubling in a national context where allegations of forced conversions are widespread and where such acts are not explicitly criminalized under domestic law.

On faith as it relates to marriage; on the jurisdiction of the Court

In addition to the above, Mst. Maria Bibi herself produced Certificate Serial No. 2595 dated 29.07.2025, issued by Dar-ul-Afta Ahl-e-Sunnat (دارالافتاء اہل سنت), Lahore, to establish that she, in addition to the aforesaid affidavit, made a formal declaration of embracing Islam, duly attested by the witnesses and the head of the said institution. Undoubtedly, this certificate was issued two days after the solemnization of her marriage; however, it sufficiently verifies and confirms her earlier declaration made at the time of her marriage with respondent No. 6. The aforesaid declarations are adequate to conclude that Mst. Maria Bibi has fulfilled all the prerequisites for embracing Islam. Any further probe into the matter, or an attempt to ascertain the true nature of her prior disbelief, would amount to unwarranted intermeddling, unjustifiable on any ground. It is not within the province of this Court, particularly in the present jurisdiction, to inquire into the genuineness or otherwise of her conversion. Moreover, it is immaterial whether the motive of Mst. Maria Bibi was a genuine spiritual transformation or merely a device to contract marriage with respondent No.6, particularly when she had unequivocally admitted the correctness of the Nikahnama while recording her statement under section 164, Cr.P.C., before a court of competent jurisdiction. It is, therefore, concluded that she, *prima facie*, is no longer a Christian by faith and, as such, her marriage was validly solemnized under the Ordinance.

Our analysis:

The Court makes an egregious dereliction of duty by declining to investigate the suspicious order, abruptness, and speediness of events.

The formal faith conversion certificate being registered so soon **after** the marriage - rather than before - illustrates that the girl's 'acceptance' of Islam was sudden, likely non-consensual, and purposefully conspired by the perpetrator to ensure:

- that the marriage would be solemnized per the Muslim Family Laws Ordinance, which would otherwise not legitimize interfaith unions; and
- that the age discrepancy between the spousal parties would be legally justifiable under Sharia jurisprudence

On relevant legislations and precedents regarding marriageable age

Having addressed the foregoing aspects of the matter, we now turn to the other significant contention advanced by learned counsel for the petitioner regarding the validity of the marriage on the ground that Mst. Maira Bibi was allegedly a minor at the time of its solemnization.

The Province of Punjab has formally adapted the Child Marriage Restraint Act, 1929, through the Punjab Child Marriage Restraint (Amendment) Act, 2015, with certain modifications.

[point 13]Since the present controversy arises within the territorial limits of the Province of Punjab, it is thus to be examined and determined strictly in accordance with the legal framework provided under the Act of 1929, as applicable and adapted in the Province of Punjab.

[point 14] The question of the legality of child marriages, particularly in the context of the prohibitions contained in the Act of 1929, has consistently engaged the attention of the then superior courts of the country after independence. Notably, for the first time, the issue of the

.....It is true that a female under 16 years of age comes within the definition of child and a male above 18 years of age who contracts a child marriage is liable to be punished but there is nothing in the Child Marriage Restraint Act which affects the validity of such a marriage. The validity of the marriage in the present case must be determined according to the rule of Muhammadan Law and according to that law that marriage is valid as Mst. Shagufta Parween even according to her father was more than 15 years of age on the date of marriage and must be presumed to have attained puberty. The Child Marriage Restraint Act merely punishes the male for contracting a marriage with a "child" but it does not render the marriage invalid.

[point 16]

'Mr. A. G. Choudhri, learned counsel for the petitioner, has contended that the High Court should not have accepted the application filed by the respondent under section 491, Cr. P. C. Mst. Musarrat being a minor girl should have been ordered to go with her father. He further contended that as a case was pending against respondent No. 1 under sections 363/366, P. P. C., the High Court should not have entertained an application under section 491, Cr. P. C. The contention of the learned counsel has not impressed us. It is not disputed that Mst. Musarrat has attained the age of puberty and she had married with respondent No. 1 of her own free will. Such a marriage is valid according to Muhammadan Law. It was urged that such marriage is invalid under the Child Marriage Restraint Act and, therefore, it should not have been recognised by the High Court. This contention also has no force. Since the marriage is valid under the Muhammadan Law, respondent No. 1 is the guardian of Mst. Musarrat and the High Court was perfectly justified in allowing her to go with her husband. We are satisfied that substantial justice has been done in this case. We, therefore, do not consider this as a fit case to interfere in our special jurisdiction. The petition is dismissed.'

Our analysis:

Problematically, the Court places its deliberation of the married girl's age **after** its determination of her purported faith. This sequencing implies the court's intention from the outset to invoke religious doctrine as a means to later downplay or reject valid concerns about the girl's young age.

The Court states its intention to examine the case in accordance with the Punjab Child Marriage Restraint (Amendment) Act, which prohibits the solemnization of marriages of girls under the age of 16 years.

In the following paragraphs, however, the Court betrays its promise by citing two cases which relied on Muhammadan (Sharia) Law to permit the marriages of teenage girls based on the presumption that they had attained puberty (defined in Islamic jurisprudence as having experienced their first menstrual cycle). Absurdly, the Court places significance on these decades-old cases, including those of not-yet-sixteen-year-old Shagufta Parween in 1962 and Ms. Musarrat in 1970. Over the last half-century, however, consensus has increasingly coalesced around the view that child marriage is unacceptable under any circumstance. Reflecting this shift, Lahore High Court Justice Shahid Karim made the following judgment in 2024, directing the government of Punjab to revise its existing Child Marriage Restraint Act and eliminate the gendered disparity in minimum marriageable age:

"I have no doubt in my mind that the definition of child, in its present form, in [the] 1929 Act is discriminatory. In sum, the words in section 2(a) - 'if a male, is under eighteen years of age, and if a female, is under 16 years of age' - being unconstitutional, are held to be without lawful authority and of no legal effect. They are struck down".⁴⁷

On the age of the petitioner's daughter

In the present case, the contention of the petitioner is that his daughter is a minor child, approximately 12 years, 9 months, and 20 days of age, and that, on this ground alone, the marriage cannot legally stand. Even if, for the sake of argument, it is assumed that Mst. Maria Bibi is of the age alleged by the petitioner, her father in the instant petition; such a plea stands in stark contradiction to his earlier stance taken in the F.I.R., wherein he stated her age to be 13/14 years. Such inconsistency materially undermines the credibility of his version.

Moreover, the birth registration certificate issued by the Union Council, Canal View, Lahore, bears both the date of entry and the date of issuance as 13.11.2019, whereas the Child Registration Certificate issued by the National Database and Registration Authority bears the date of issuance as 12.09.2022. Both documents (available on record) were thus obtained approximately seven and ten years, respectively, after the alleged date of birth of Mst. Maria Bibi. The learned counsel for the petitioner failed to advance any plausible explanation for such an inordinate delay in the registration and issuance of these documents. In the absence of a satisfactory explanation, the probative value of these documents is significantly diminished, particularly when delayed registration of birth is always susceptible to manipulation unless corroborated by independent and reliable evidence.

Even otherwise, Mst. Maria Bibi had her date of birth recorded as 01.02.2007 in the *Nikahnama* and also refuted her father's stance regarding her alleged minority. In these circumstances, these documents cannot be relied upon as the sole basis for concluding that Mst. Maria Bibi was born on 07.10.2012, as alleged by her father, particularly when she is physically present in this court and appears to be of a more advanced age.

Since the marriage in question was solemnized by Mst. Maria Bibi with respondent No. 6 of her own free will and consent, as acknowledged by her in her statement recorded under section 164, Cr.P.C., and is valid under Muhammadan Law, the respondent No.6, being her husband, assumes the status of her lawful guardian (wali). Consequently, the High Court was fully justified in holding that her custody with her husband cannot be termed illegal or unlawful, particularly in the absence of any declaration of invalidity by a competent court of law.

20. For the foregoing reasons, it is concluded that the High Court correctly understood the controversy at hand and made a well founded decision based on the relevant law on the issue. In its thorough analysis of the applicable law and the available facts, the High Court arrived at a sound and reasoned conclusion that is both legally correct and just. Hence, no illegality, perversity, or misreading or non-reading of evidence has been found in the impugned judgments. Accordingly, leave is refused, and the petitions are dismissed.

Our analysis:

The Court's treatment of evidence is equally concerning. By discounting state-issued documents such as birth/child registration certificates, which are generally regarded as authoritative proof of age, the Court introduced a problematic degree of subjectivity in its reasoning. Notably, the Court takes issue with the recency of the issuance of Maria's documents, even implying that they could have been subject to manipulation. On the contrary, the Court declines to scrutinize the documents provided by the opposing party. Ironically, and hypocritically, it takes the faith conversion document at face value, despite that its issuance following the marriage rather than preceding it is undeniably suspicious.

Moreover, the Court's reliance on physical appearance as an indicator of age further undermines established evidentiary standards and raises questions about consistency and reliability in judicial reasoning.

POLICY RECOMMENDATIONS

In light of the findings presented in *Stolen Girls*, there is an urgent need for a coherent, rights-based, and nationally coordinated response to address child marriage, forced conversion, and abduction, particularly affecting girls from religious minority communities in Pakistan. The following priority actions are proposed by Voice for Justice and Jubilee Campaign:

- 1 Enact comprehensive legislation that clearly criminalizes coerced religious conversion as a distinct offence, with strict penalties for perpetrators and accomplices. The law should include safeguards consistent with international human rights standards, the principle of legality, religious freedom, and equality before the law.
- 2 Strengthen legal and judicial safeguards to prevent the misuse of conversion claims in cases involving minority girls, especially where such claims are linked to marriage. Courts should ensure that allegations of voluntary conversion and marriage are examined rigorously and free from coercion.
- 3 Amend federal and provincial child marriage laws to declare all marriages involving persons under 18 years of age null and void. Child marriage should be treated as a serious rights violation rather than a valid civil or religious act.
- 4 Ensure that all cases of abduction, coerced religious conversion, forced marriage, and sexual violence involving minority girls are independently, impartially, and promptly investigated. Police and other authorities must be protected from political, religious, or social pressure, and officials who fail to act lawfully should be held accountable.
- 5 Require police to apply all relevant legal provisions at the time of FIR registration and investigation, including sections addressing abduction, child abduction, forced marriage, and child protection.
- 6 Give primary evidentiary value to official age documents, including Child Registration Certificates, Computerised National Identity Cards, birth certificates, school records, and family registration documents. Where documentary proof is unavailable, age determination should rely on medically sound, non-invasive methods. Fraudulent marriage and conversion certificates, as well as statements obtained under duress, should not override reliable official records.
- 7 Ensure that courts interpret constitutional guarantees and statutory protections in a manner that upholds equality, justice, and fair trial rights for all citizens. Religious or personal law interpretations must not override child-protection standards or be applied in ways that discriminate against minority communities.
- 8 Require that conversion claims involving minors be examined by a competent court under conditions that reduce coercion. Statements of minor girls should be recorded in a protected setting, such as the judge's chamber, rather than in open court, where pressure from abductors or their associates may influence their testimony.



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- 9** Regulate conversion certificates through authorized state institutions and require proper registration. Certificates issued by schools, NGOs, political parties, or other unauthorized bodies should have no legal validity. Monitor the shrines and seminaries involved in the conversion of underage minority girls, ensuring that they do not operate with impunity.
- 10** Require marriage registrars to verify the age of both parties through official documents and to ensure the presence of a legal guardian where required by law. Marriage certificates should be completed accurately and fully before any marriage is solemnized.
- 11** Ensure that abducted girls are recovered promptly and safely, and that they are protected from intimidation while their statements are recorded. Victims should be able to testify freely, without fear of retaliation from abductors or their associates.
- 12** Guarantee that girls placed in shelter homes are not subjected to religious indoctrination or pressured to confirm conversion and marriage claims. Abductors or their supporters should not be allowed access to the victim during the period of protection.
- 13** Provide survivors with effective remedies and comprehensive support, including legal aid, psychological counselling, safe shelter, medical care, and rehabilitation support. Special attention should be given to the long-term trauma, social exclusion, and family separation often experienced by survivors.
- 14** Introduce affirmative measures to protect, promote, and fulfill minority rights, including reforms in the civil and criminal justice systems to make them more responsive to victims and their families. Training should be provided to police officers, magistrates, marriage registrars, and other relevant officials on domestic laws regarding child marriage, child protection, and international human rights standards.
- 15** Establish a reliable national data-collection system on forced conversion, child marriage, and related abuse against minority girls to understand the scale of the problem, identify trends, and develop effective policy responses.

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APPENDIX A

Abridged Additional Cases

Hoorab Basharat¹ has been living in a family consisting of six persons, including her father Basharat, aunt Mariam, and three siblings, in a house located at village Chak 7 in Faisalabad. Basharat, as a single parent, has been taking care of his children for six years after the death of his wife, and he works as a laborer to make both ends meet, even though he suffers from asthma and a fractured arm.

This poor family was leading a smooth life; however, their life changed drastically on the day when Hoorab visited a nearby grocery store to purchase some household items, but she didn't return home. On 28 December 2022, a Muslim worker at Mustafa grocery store, Muhammad Usman abducted her from Faisalabad and took her to Chiniot, where she was raped, forcibly converted, and forcibly married off to the captor.

On 30 December 2022, an FIR (No. 1291/22) under section 365-B of the Pakistan Penal Code was registered at Nishatabad police station against Mustafa and Usman, the owner and worker at a grocery store, for their involvement in the abduction of Hoorab. Later, another offense under section 4/5 of the Punjab Child Marriage Restrain Act

On 11 February 2023, the Municipal Committee, Chiniot declared the marriage certificate of Haroob and Usman dated 15 January 2023 to be unregistered, legally invalid, and fake. The police arrested the abductor, Muhammad Usman and made the recovery of the minor girl, Hoorab Basharat possible from the captivity of the oppressor.

On 17 February 2023, Hoorab was brought to the Magistrate, Faisalabad, who sent her to a shelter home, Dar-ul-Aman on the grounds that she is a minor girl, and her marriage is illegal according to Child Marriage Restraint Act, 1929.

During the investigation, Mustafa told the police that Usman had enticed the little girl with the promise of buying her an expensive new dress, while Usman confessed that he is not married to the little girl, and the court sent her to jail on judicial remand.

On 24 March 2023, Hoorab appeared before the Magistrate, Faisalabad and got her statement recorded that she doesn't want to stay at a shelter home; instead, she wants to live with her father, and the magistrate ordered her to reunite with her family three months after her abduction and forced faith conversions. Hoorab's father Basharat, had been receiving threats of dire consequences for pursuing the case. On 24 April 2023, Basharat was killed in a conflict with neighbors over a competition involving pigeon-flying competition that led to his brutal murder. An FIR (678/23) was registered in Police Station Nishat Abad, Faisalabad. However, the culprits have not been brought to justice.

Jubilee Campaign adopted Hoorab and her other siblings, and took care of their education, clothing, accommodation, and other needs for a period of two years.

Christina* Razzaq, a 12-year-old Christian girl from Pir Mahal in Punjab Province, was abducted at gunpoint on September 29, 2023, by Ahmed Raza and three armed accomplices as she returned from visiting her uncle's house. Subsequently, she was coercively converted to Islam and forcibly married under the Islamic name of "Chahat." During her month-long captivity, Christina was gang-raped multiple times by the four perpetrators.

The marriage form dated September 27, 2023 fraudulently recorded her age as above 17 years, deliberately circumventing the Child Marriage Restraint Act. This antedated document, issued two days before Christina's abduction, was part of the perpetrators' tactic to use the Nikahnama (marriage certificate) as a legal shield to evade accountability.

Christina's brother, Marqas Razzaq, reported her abduction at the Pir Mahal Police Station in Toba Tek Singh District, leading to the registration of FIR No. 798/23 on October 5, 2023, under Section 365-B of PPC. Police recovered Christina during a raid on October 29, 2023, and arrested Ahmed Raza, though the other three suspects escaped and remain at large.

On October 30, 2023, Christina was presented before the Pir Mahal Magistrate, where she recorded her statement under Section 164 of the CR.PC. that she was gang-raped by four individuals and had neither embraced Islam nor entered into any marriage. Following her statement, the police invoked Sections 375-A and 364-A of the PPC, relating to gang rape and abduction for rape, in the FIR.

On December 2, 2023, Christina's mother, Margret, filed a suit for jactitation of marriage in the Family Court, Pir Mahal, seeking a declaration that Christina's marriage to Ahmed Raza was invalid. On July 23, 2024, Judge Naveed

On December 2, 2023, Christina's mother, Margret, filed a suit for jactitation of marriage in the Family Court, Pir Mahal, seeking a declaration that Christina's marriage to Ahmed Raza was invalid. On July 23, 2024, Judge Naveed Anjum issued a decree declaring the marriage null and void. The Nikkah Registrar, Muhammad Irfan, stated before the court that he never solemnized the marriage. No record of the alleged marriage exists in the Union Council, and his signature and thumb impressions on the marriage form were forged.

On July 9, 2025, Additional Sessions Judge Pir Mahal, Jamshed Mubarak, found Ahmed Raza guilty of abducting and raping a minor girl. He sentenced Raza to life imprisonment and a fine of approximately \$351 USD under Section 376(iii) of the PPC, and to 10 years' rigorous imprisonment plus a \$176 USD fine under Section 364-A. The judge also ordered Raza to pay \$176 USD to Christina for mental anguish and physiological damage.

Although authorities have failed to apprehend the remaining suspects, the successful prosecution of the main perpetrator in this case demonstrates that justice is attainable when families from minority communities remain steadfast in their pursuit of justice despite obstacles and challenge the silence and stigma that often shield perpetrators of such heinous crimes.

*The girl's name has been changed.

In November 2023, while her father was at work at the Mayo Hospital in Lahore, 14-year-old **Shifa Razaqat**² was taken from her home in Mohalla Labor Colony by her neighbor, Najma Liaqat. Shifa's father, Razaqat Masih, filed an FIR at the Sheikhpura Police Station; however, local authorities made a callous remark to the concerned father, disregarding that a teenage girl had been wrested from her home and family: "Your daughter will never return to you, Inshallah (God willing)".

Exemplifying their disregard for the pleading father, authorities failed to recover Shifa for six months. Over the course of this half-year, Liaqat was able to obtain fabricated religious conversion and marriage certificates, which incorrectly renamed the girl Amina, falsely identified her age as 18 years, and documented her 'marriage' to a man more than three decades her elder, 48-year-old Syed Shabbar Ali Gillani. The records also listed Hafiz Fazal Dad Khan Chishti as the cleric who solemnized the marriage, although he denied this. This discrepancy raises questions about whether Chishti lied to cover his complicity in the crime, or if Liaqat purposefully placed the Islamic cleric's name on the marriage certificate to manufacture its authenticity.

On 11 March 2024, Shifa, likely under coercion, recorded her statement attesting to the marital union before a magistrate at the Lahore District Court. In combination with the fabricated documentation provided by Liaqat, Shifa's statement was cited as justification for police inaction to dissolve the alleged marriage, even though community members had raised to the authorities' attention rumors that Liaqat and his accomplices were planning to open a brothel.

Multiple hearings scheduled for March, May, and June were ultimately adjourned without proceeding, thereby prolonging Shifa's captivity. Human rights activist Anosh Waseem points out that the National Commission for Human Rights (NCHR) sent numerous communications regarding Shifa's case to the District Police Officer of Sheikhpura and Punjab's Inspector General of Police, none of which received responses. The FIR against the accused was reportedly withdrawn under financial influence, and Shifa was later divorced. After contacting her family from Islamabad, where she had been living with a group of girls, she returned home and reunited with her parents.

In January 2024, 18-year-old **Salma Bibi**³, a Christian domestic worker from Ajniawala, was abducted by Umer Khattari and forcibly eloped. Bibi's father, Munir Masih, initially sought intervention from the local council of elders (panchayat), but they alleged that the girl had willingly married Khattari and therefore did not require rescue. Without financial resources to escalate their concern to the authorities, and facing pressure from the panchayat, Masih relinquished the pursuit of his daughter.

Five months later, Salma's elder brother, Abid, happened upon Salma sitting in a rickshaw with a group of women in Gujranwala. Salma desperately rushed towards him, bleeding, pale, and with injuries across her body. After being brought home, Salma revealed the abuse she had incurred to her mother, who was tending to the girl's wounds. Khattari had repeatedly raped Salma after the abduction, before transporting her to Gujranwala, where she was sold to a brothel and further sexually abused by random men, including Khattari's acquaintances. As a result of the persistent rape, Salma became pregnant and was supplied with abortion pills

by the brothel procurer. After ingesting the medication, however, Salma suffered severe bleeding and was being transported to a local hospital when she unexpectedly encountered her brother.

Lacking the finances to secure professional trauma care for Salma, the girl's family opted to treat her at home to the best of their abilities; however, she passed away from hemorrhage just two days later. Having learned of Salma's death, Khattari falsely accused the girl's family of fatally poisoning her, but his allegations were refuted by local villagers who attested to Salma's severe bleeding and high fever prior to her death.

Unconscionably, police initially declined to arrest Khattari. It was only once Salma's younger sister Nisha was approached by him more than a month later and threatened with rape and murder that the authorities registered an FIR against the man and detained him.

In March 2024, teenager **Yarosha Masih**⁴, a resident of Ferozewalla, Sheikhpura, was manipulated by a Muslim neighbor, Imran Sarfaraz, to sign religious conversion and marriage documents; he had deliberately misled his victim into believing the papers were waivers to visit a water amusement park in Lahore. Subsequently, the girl's father Saleem Masih was summoned to court pursuant to a complaint filed by Sarfaraz alleging that Masih had been detaining Yarosha, who had been legally registered as his wife.

Masih provided the court with Yarosha's birth certificate, which identified her birth year as 2013, placing her at 11 years old at the time of the incident. Accepting the verified documentation, the court discarded Sarfaraz's petition and instead filed a case against him instead for marriage of a minor; additionally, Sarfaraz's mother, the marriage registrar, and witnesses of the betrothal were charged as accomplices. Ramesh Singh Arora, the provincial Minister for Minority Affairs in Punjab, directed the authorities to promptly arrest and prosecute Sarfaraz.

On Easter 2024, 16-year-old **Kainat Pervaiz**⁵ left her home in Nowshera, Khyber Pakhtunkhwa, to go grocery shopping, only to be abducted at gunpoint by a man named Muhammad Suleman, who transported the girl to his sister's vacated residence and raped her multiple times. The following day, Suleman asked Kainat's father, Pervaiz Masih, over the phone to meet him at the house so he could return his daughter. Masih, a retired Air Force Watchman, was at the office when he received the phone call, and Air Force authorities advised him not to wait for police intervention but rather immediately retrieve Kainat. Masih did as such, and Suleman presented a false narrative to his victim's father, claiming that he witnessed her aimlessly wandering the streets and offered her "safe shelter" in his sister's home. Obviously, Suleman's deception was immediately disproven when he unlocked the door to the room concealing Kainat, causing her to flee into her father's arms and tell him that Suleman had abducted and sexually assaulted her.

Having rescued his daughter, Masih and Kainat visited the local police station in Nowshera, where the girl relayed the incident that had transpired. Abhorrently, despite such a compelling testimony, police declined to arrest Suleman and instead encouraged Masih to settle with the perpetrator financially. Doing so would 'eliminate the need' to file an FIR and present the case in court, but it would also permit Suleman to pay a fine to avoid criminal prosecution and, likely, prison terms for kidnapping and rape of a minor. Masih rejected these recommendations. Police directed him to have Kainat medically examined for injuries at the district hospital and acquire a certificate of evidence of harm. Even though Masih obtained this documentation corroborating Kainat's testimony of being raped and bruised on her nose by Suleman, police refused yet again to file an FIR and instead delegated the case to local community elders (jirga). Although tasked with resolving the dispute, jirga members, with the assistance of police station officials, coerced Masih into signing a written compromise to relinquish Kainat for marriage to Suleman in exchange for financial compensation.

Masih sought assistance from a known advocate and secretary of the Central Peace Committee in Khyber Pakhtunkhwa, Matthew Suleman [of no relation to suspect], who accompanied the distraught father to the office of the Deputy Superintendent of Police. The deputy answered Masih's pleas by instructing the Nowshera station officer to promptly file an FIR against the abductor and provide a reasonable justification for the station's refusal to do so in prior interactions with Masih. The station officer did file an FIR, albeit five days after receiving instructions from his superior; additionally, he provided no explanation for the delay in so doing.

To this day, the FIR has not resulted in Suleman's arrest for his horrific violations against Kainat. In fact, as a noteworthy local resident of Nowshera, Suleman's influence has pressured Masih and his family to relocate to a shelter generously offered by Member of Parliament, Suresh Kumar. Moreover, Masih succumbed to pressure to drop the case against Suleman, lest he, his wife, and three daughters face further violence and threats by Suleman and his peers.

In March 2024, 13-year-old **Roshni Shakeel**⁶ was abducted by a man more than twice her age, 28-year-old Muazzam Mazhar, who had for some time been making repeated advances and proposals to the girl. Mazhar had even shared his dishonorable and criminal intentions with his father, Abbas, who made a transnational call to Roshni's father from Saudi Arabia, threatening him with violence if he did not relinquish the girl. Roshni's father rejected these demands, prompting Abbas to claim "there's nothing you 'Chuhra's' [religious slurs for Pakistani Christian converts] to stop us from taking her.

Within two days of Roshni's kidnapping, Mazhar colluded with a local Islamic cleric to fabricate a faith conversion certificate listing her identity as Muslim and age as 18 years. With this fraudulent documentation, Mazhar was able to marry the young girl and rename her Zehra Bibi. Roshni's father filed an FIR at the Multan Bench of the Lahore High Court, only to be turned away as his daughter had provided a statement attesting to her faith conversion and marriage.

One Muslim neighbor encouraged Roshni's father to give up on reclaiming the girl and reach a monetary settlement to defend his 'honor'. In similar cases, fathers who exhaust all efforts to rescue their daughters may be accused of dishonor and absurdly charged with kidnapping for purportedly trying to abduct the 'Muslim women' from their new 'husbands', even when such illegal marriages themselves are the result of child kidnapping and trafficking. Roshni's father would soon fall into this trap himself.

Roshni made a risky escape from Mazhar and returned home to her family. And, despite the turmoil and anguish she must have endured in the two months she spent in her abductor's captivity, she independently and fearlessly filed petitions at two courts in Multan against the counterfeit marriage certificate, which officials accepted without question in an egregious miscarriage of justice that would force Roshni back into the clutches of her abuser.

In October 2024, rather than arrest Mazhar for abducting and harboring a minor, Judge Farooq Latif unconscionably ordered the arrest of Roshni's father on charges of abduction for allowing his own daughter to remain with her family rather than sending her back to captivity. Roshni's mother has reflected on the development: "The police are torturing our family, including my husband's brothers, and have lodged false FIRs against us. The reason is to [hinder] us from raising our voice to obtain justice for our daughter. The Muslim family is behaving like Roshni is their property. They abduct her again and again, and police are cooperating with them."

In April 2024, 13-year-old **Sania Ameen**⁷ disappeared from her home, with no witnesses, as her elder sisters were preoccupied with chores, and their parents were out of town visiting a family relative. After realizing that the girl had gone missing rather than simply running errands nearby, the sisters summoned their parents home and initiated a search across the community for Sania. The girls' father, Ameen Masih, reported Sania's absence to the police in Sialkot. The following day, the family discovered a nondescript folder dropped outside of their home containing a marriage certificate falsely identifying Sania as an adult and indicating her marriage to 23-year-old already-betrothed Muhammad Saif Ali.

It was uncovered that Qari Shakir Hussain, a member of the Islamist political party Jamiat Ulema-e-Pakistan, had been a conspirator in the crime; the man boasts a notorious reputation of encouraging Muslim men to kidnap, religiously groom, and marry Christian girls and women. Despite widespread knowledge of his egregious conduct, his political influence often dissuades family members of kidnapped girls from pursuing criminal charges. Sania's new 'husband' Saif Ali has leveled warnings against the family for their refusal to drop the case against him, threatening to kidnap Sania's sisters Rabeeta, Hina, and Arooj.

Sonia Tariq⁸, a 15-year-old Christian girl from Lahore District in Punjab province, was abducted on November 7, 2024 from her workplace and subsequently compelled to convert to Islam. Although official records indicated that she was a minor, the Federal Constitutional Court declared her an adult capable of making independent life choices and declined to restore her custody to her parents.

Sonia's father, Tariq Nadeem, aged 57, resides in UET Block B, Lahore, with his family. He has five children, including three daughters and two sons. Due to a serious eye disease, he is unable to work. His wife and two daughters work as domestic helpers for influential families to support the household financially. Sonia Tariq was employed at a beauty parlour, Bellissimo by Aasia, in Lahore.

On November 7, 2024, Sonia did not return home after work. Her family contacted her acquaintances to locate

her, but in vain. Upon Sonia's disappearance, her father, Tariq Nadeem, submitted a complaint of her daughter's abduction at the police station Satukatla Lahore, which led to registration of an FIR (No. 3623/2024) against unidentified persons under section 365-B of PPC. Unfortunately, the police recorded Sonia's age as 18 years in the FIR, despite her NADRA-issued birth certificate showing that she was born on 21 May 2011. At the time of the incident, Sonia was only 13 years old and therefore legally a minor under Pakistani law.

Sonia appeared before a Judicial Magistrate and recorded her statement under section 164 Cr.P.C., asserting that she had voluntarily embraced Islam, adopted the Islamic name "Ayesha," and did not wish to return to her Christian family.

After repeatedly attempting to trace Sonia's whereabouts, her family was informed by her Muslim co-worker, Ayesha Barkat, and Ayesha's father, Akram Barkat, that Sonia had converted to Islam and was living with Zulfiqar Dogar. However, when the family contacted Zulfiqar Dogar, he denied that Sonia was in his custody and claimed that he did not know her whereabouts.

The petitioner later submitted a supplementary statement nominating Ayesha Barkat, Akram Barkat, and Zulfiqar Dogar as accused persons. He alleged that Sonia had been abducted for sexual exploitation under the pretext of religious conversion and marriage.

On November 10, 2024, Tariq Nadeem filed a writ petition in the Lahore High Court (LHC) under Article 199 of the Constitution of Pakistan, seeking Sonia's recovery and custody. During proceedings held on 19 December 2024, Justice Muhammad Amjad Rafiq observed that Sonia was a minor according to the NADRA birth record. The Court further noted that she was residing at Madrisa, Madina-tul-Quran, an unregistered religious institution located in Valencia Town, Lahore. The Court directed that she should be shifted to Dar-ul-Aman, a government-run shelter home for women in Lahore. The Court further instructed the administration of Dar-ul-Aman to formally assume responsibility for her care, while the question of her future custody was left to be determined by the competent magistrate.

In January 2025, the perpetrators sought Sonia's custody from the shelter home, claiming that she wished to reside with a Muslim friend. The Judicial Magistrate rejected the request, holding that the LHC had already placed Sonia under judicial protection and that she could not be removed from the shelter facility. However, in June 2025, another magistrate permitted Sonia to leave the shelter home with a person of her own choice.

Despite pressure from certain police officials to discontinue pursuing the case, Sonia's family continued to exercise available legal remedies to regain her custody.

Tariq Nadeem subsequently challenged the Lahore High Court's verdict before the Federal Constitutional Court (FCC). During proceedings held on 23 April 2026, counsel for the petitioner argued that even if Sonia had changed her faith, her custody should remain with her parents because she was still legally a minor. The Court directed the police to produce Sonia before the bench.

On May 5, 2026, Sonia appeared before the FCC and stated that she was 20 years old, had converted to Islam voluntarily, remained unmarried, and did not wish to return to her family because they would pressure her to revert to Christianity. During the hearing, the bench comprising Justice Aamer Farooq and Justice Karim Khan Agha questioned the authenticity and reliability of Sonia's birth certificate issued by the National Database and Registration Authority (NADRA). The judges remarked that official records could potentially be manipulated and should not automatically be treated as conclusive proof of age. The Court ordered an ossification test to medically assess Sonia's age, while Sonia was directed to remain at Dar-ul-Aman, Lahore, and her parents were permitted visitation rights.

During the hearing on May 20, 2026, a Special Medical Board from Services Hospital Lahore submitted its report estimating Sonia's age to be between 18 and 19 years. Relying primarily on the medical opinion, the FCC bench comprising Justice Aamer Farooq and Justice Syed Arshad Hussain Shah observed that no order regarding her custody could be passed because Sonia, being a major, is legally entitled to independently decide where she wishes to live and whom she wishes to associate with, including whether to maintain contact with her parents.

Sonia is residing at a place provided by the perpetrators and remains under their undue influence. The family remains deeply concerned regarding her safety, emotional well-being, and possible exploitation. They are convinced that she was coerced into embracing Islam. They fear that Sonia may have been secretly married following her conversion, although no marriage certificate has been presented before the courts. This absence

of scrutiny has potentially enabled those involved to evade accountability for possible offences relating to child marriage, sexual exploitation, and unlawful confinement. The case reflects serious violations of human rights and religious freedom, as minor girl Sonia's faith conversion occurred in circumstances and environment that involved prolonged separation from family, vulnerability, exploitation, and coercion, and undermined the international standard of informed, free, and genuine consent in making such choices by children, and the right to fair trial, disregarding the official record of birth.

In January 2025, the home of a Catholic family in Okara District, Punjab, was ambushed by 40-year-old neighbor Sajjad Baloch and two additional assailants; during the episode, the attackers abducted teenager **Ariha Gulzar**⁹ and forced her into their car. The girl's father, Gulzar Masih, witnessed the intrusion and kidnapping but was unable to thwart the crime. Instead, he immediately phoned Baloch's family to plea for his daughter's release, only to be told by the family to wait two or three days. However, the following day, Masih received a call from the Baloch family, threatening Ariha with rape and sex trafficking should Gulzar and his wife try to intervene further. Nonetheless, the girl's parents would not relinquish their attempts to rescue their daughter.

Just a few days later, the Baloch family fled and were untraceable after locking up their former residence. Masih requested the assistance of local police who, despite being cognizant of Sajjad Baloch's criminal history and reputation, failed to locate him and rescue his victim. Masih intended to file charges against Baloch, but his financial hardship impeded him from doing so.

Finally, in April, the Lahore High Court ordered that Ariha be presented in court to testify. At the hearing, the girl claimed to be 18 years old and stated that she had accepted Islam and married Baloch consensually; however, her visibly distressed and disoriented appearance drew scrutiny about the veracity of her remarks. This observation, in addition to the family's presentation of Ariha's birth certificate, was taken into consideration by Justice Shahram Sarwar, who made the common-sense decision to order the underage girl's return to the custody of her family.

In January 2025, 12-year-old girl **Saba Shafique**¹⁰ disappeared from outside of her residence in Lahore, Punjab with 35-year-old Muhammad Ali who expeditiously transported her to Sialkot to acquire fabricated faith conversion and marriage documentation from a corrupt cleric. Subsequently, the two moved to Shaheed Benazirabad, Sindh, where they remained for two months until local authorities entered the home to rescue Saba and detain Ali.

Following her return to Lahore and reunion with her parents, Saba divulged further details of her time in captivity. Ali deceived the girl into believing he would bring her to a local marketplace and purchase gifts for her, all while lavishing her with promises that he would 'keep her happy'. After becoming uneasy about Ali's behavior, Saba asked him to return her, as her parents would be concerned about her whereabouts. Instead, Ali obtained the false documents alleging her faith conversion and the duo's marriage, even coercing Saba into recording a statement that she was 18 years old and that she did not wish for her parents to intervene.

Cognizant that his victim's family was likely appealing to authorities for assistance in recovering the girl, Ali took Saba to District police to file a petition to protect the marriage against undesired family interference. During her time with Ali, Saba stated, she was physically and mentally abused, confined, and punished when she cried for her parents. Reflecting on the time preceding the incident, Saba's mother Rakhil said that Ali had never behaved predatorily towards any of the village children in a way that would raise suspicions. Sohail Habil of HARDS Pakistan, the leading actor in securing freedom for Saba, says the organization intends to file charges against Ali for child marriage and rape.

In January 2025, 15-year-old **Sanaha Masih**¹¹ was abducted from her aunt's home in Sialkot, Punjab, by one Muhammad Anees and four collaborators. The girl's father, Yousaf Masih, is one of the hundreds of impoverished Catholic and Christian men, women, and children conscripted into peonage at brick kilns across Pakistan. Anees had never raised suspicions about his nefarious intent, so he was not initially believed to be the perpetrator, but after learning about the man's involvement in his daughter's disappearance, Masih filed a case with authorities.

Nearly two weeks lapsed - during which Sanaha's family made endless rejected pleas for help from officials - before action was taken, albeit minimal. Rather than searching for the missing child, police informed Sanaha's parents that she had willfully converted to Islam and married Anees. The faith conversion and marriage certificates shown to the family were clearly fabricated. The family's attorney Hanif Hameed discredited the documents, noting that the dates listed for Sanaha's purported faith conversion and marriage were before she

had even been abducted from her home in Sambrial.

Saneha's family filed a petition with the Lahore High Court, citing the fraudulent 'evidence' issued by the perpetrator in Gujrat District. In May, approximately four months after her disappearance, Saneha was rescued by police and presented in court. Having observed her emotional trauma and physical injuries, the court ordered that she be placed in a state-run rehabilitation facility in Sialkot. There, it was discovered that Saneha had been impregnated as a result of rape during her time in captivity. Meanwhile, Anees was placed on judicial remand while authorities searched for the absconding co-facilitators.

Two weeks after her first appearance in court, Saneha recorded a statement before a magistrate expressing her wish to return to her family. Now at home, she is recovering from the ordeal. Concurrently, the family lawyer, Hameed, is making preparations to file charges of rape, forced religious conversion, and child marriage against Anees and his accomplices.

In May 2025, 16-year-old girl, referred to as '**daughter of Shahzad Masih**',¹² was abducted by 28-year-old married man Muhammad Asim in Nankana Sahib, Punjab. Prior to the kidnapping, the girl would be verbally harassed by Asim, who was a chef at a restaurant located alongside her regular route to and from her academy. Gradually, Asim became more aggressive, even physically accosting her in numerous instances. The girl's father encouraged her to choose a different route to school and try to avoid any further interactions with Asim, as being vocally resistant to the man could potentially foment hostility from the broader Muslim community.

Though she had started walking with her classmates to be safe, Asim kidnapped her one day when she was alone. He forcibly pressed her inked thumbprint to blank documents which were later made into marriage and faith conversion certificates. When Asim brought the girl to his home, his first wife rejected the plural marriage and left with their two children. Out of the sight of his adult wife, over the course of the next few days, Asim physically, sexually, and psychologically tormented the girl in his home. All the while, Asim brainwashed her into thinking that her family would never welcome her if she were to return to them due to her new Muslim identity and the stigma of surviving rape.

Asim forced his victim to ingest drugs, and when she was intoxicated and easily manipulated, he brought her to the residences of multiple local Muslim men who raped her. Each time she resisted being sexually trafficked, Asim would beat her with implements or restrain her to the bed.

Simultaneously, the girl's family made endless entreaties to the authorities on behalf of her, but they were not permitted to file an FIR. The police baselessly claimed that the girl was not a victim but rather married Asim out of love. In light of the authorities' deplorable failure to exercise due diligence, the girl's father and elder brother sought help from local Muslim elders. Having learned of these developments and the family's attempts to rescue the girl, Asim filed a counter-petition against his victim's parents for 'harassment'.

The girl's family made another last ditch effort, contacting the legal aid organization Christians' True Spirit, who successfully filed a writ of habeas corpus with Additional Sessions Judge Imran Javed Gill. In August, police arrested Asim and additionally placed the girl under 'protective custody', though she was mocked for her situation by a female officer. Even an employee at a local hospital who was tasked with treating the girl's abuse-related injuries humiliated her. In light of this gross mistreatment, Judge Gill permitted the girl's release into her parents' custody to ensure her safety and prevent further harm.

While visiting a shop in Sherakot, Lahore to purchase henna ink In June 2025, 15-year-old **Mahnoor**¹³ was approached by the security guard of the factory she worked at, named Junaid, who told the girl that their employer wanted to give her Eid gifts. In reality, the whole explanation was a ruse, as the supervisor, Faisal, and his wife Kiran, through brute force, pushed Mahnoor into Junaid's car to be rushed away to his home.

At Junaid's home in Shangla District, Khyber Pakhtunkhwa, Mahnoor was coerced into accepting Islam and placing her fingerprint on a marriage certificate. In the subsequent months, Junaid confined the girl to one room, with the lack of stimuli causing her anxiety. Mahnoor saw a silver lining in Junaid's brother Sohail who initially expressed pity for the girl and claimed he wanted to help her. Rather, he intended to traffick her; she barely avoided this horrifying prospect. Mahnoor's relief was short-lived, however, as Junaid brought her to court to record a false statement that the faith conversion and marriage were legitimate. If she refused to, Junaid threatened, he would kill her father.

Some time after returning to Junaid's home, Mahnoor was able to call her father and desperately ask for his help. He sought help from legal advocacy group The EDGE Foundation, which was able to secure her release after multiple negotiation sessions.

In June 2025, 26-year-old Babar Mukhtar abducted 14-year-old **Alishba Adnan**¹⁴, the daughter of Vehari District, Punjab sanitation worker Adnan Masih. The father immediately went to the city police station in Burewala to file an FIR, but he was repeatedly denied the ability to do so. Masih stopped by the police station numerous times but never made progress in galvanizing the authorities to act.

Masih reached out to a legal advocacy team and activist Albert Patras, who called the police and was informed that Alishba had allegedly converted to Islam and married Mukhtar; these details had not yet been relayed to Alishba's father. Patras requested the religious conversion and marriage documents to scrutinize their veracity, but the police rebuffed his inquiry. Even the senior police officer declined to heed Patras' supplications to file an FIR.

In the meantime, Alishba's father has been replaying events in his head, trying to discern how she had been kidnapped. He concluded that the abduction likely occurred when she was making a routine visit to her uncle, with whom Mukhtar was acquainted. Masih wonders whether the faith conversion and marriage were the result of threat and blackmail, or of seduction. Regardless, Masih explains, the age difference between 14-year-old Alishba and 26-year-old Mukhtar placed the teenager in a vulnerable position susceptible to manipulation.

During a court hearing in July, Alishba's parents were astonished when their daughter claimed that she had willingly converted to Islam, accepted a new name - Fatima - and married Mukhtar. Although the magistrate declared the marital union null and void after reviewing the girl's authenticated birth certificate identifying her as a minor aged 14 years, Alishba refused to return to her parents and was instead transported to a state-run rehabilitation facility. Presently, Masih and his wife have been thrust into emotional turmoil, all while the couple is raising Alishba's five younger siblings, including a pair of newborn twins. The girl's parents believe that Alishba chose to be placed in a women's shelter rather than return home because Mukhtar was not detained and could potentially exact retribution on her parents and five younger siblings.

Patras hopes to successfully file charges against Mukhtar for kidnapping, rape, child marriage and/or coerced marriage, and child sexual exploitation. He regrets that the current penal code does not include a provision outlawing forced religious conversion, which he would have liked to charge Mukhtar with as well.

In July 2025, after refusing repeated proposals from a man by the name of Usman Ali, 19-year-old Christian woman **Adan Sabir**¹⁵ was kidnapped at gunpoint by the unrelenting harasser, who subsequently provided a Faisalabad court with marriage and faith conversion certificates in an attempt to preemptively dissuade interferences by Adan's family or the authorities. During a court hearing the following month, Adan offered no verbal testimony, and her family believes her silence was the result of threats and intimidation by Ali; the perpetrator was permitted to return home with Adan.

In September, Adan's parents petitioned the Lahore High Court, which reviewed the documents and the indicators of coercion and ultimately ordered the young woman to be released from Ali's custody and return home. By November, the court officially approved of the divorce, severing the fabricated marital ties between Adan and Ali. However, just under a half-year later, in April 2026, when Adan became engaged to marry a Christian man, her ex-husband located the family's home in Jaranwala and fired gunshots. Adan and her parents have been forced to relocate frequently to elude Ali, but he has digitally tracked the family's movements. Adan's mother, Afasn, explains that Ali's harassment and continued verbal threats have subjected her daughter to anxiety, night terrors, and hypervigilance.

In November 2025, 21-year-old Christian woman **Monica Jennifer**¹⁶ disappeared from her home, sending her family into a state of concern, as she is a woman of routine who would not vanish without word to her relatives. Monica's brother, Raza, and their parents immediately attempted to file an FIR, aware that delays in registering complaints grant perpetrators a margin of time in which they can swiftly convert their victims and obtain fabricated marriage certificates before any police involvement.

Despite the family's efforts to prevent this from happening, however, police did not file an FIR until nearly a week after her disappearance. In the meantime, Monica was summoned to court, where she claimed that she had accepted Islam and married her Muslim neighbor by choice. Her family, however, calls foul at this assertion, noting that the young woman was a devout Pentecostal Christian and had close relationships with her family. Monica's brother Raza strongly believes that the Muslim neighbor, Waleed Ahmad, groomed and manipulated his sister into accepting an unwanted marriage. Regarding his sister's nikahnama (Islamic marriage certificate), Raza observed that the document excluded Ahmad's national identification number.

Meanwhile, Ahmad's family has threatened Monica's family, warning them that they would file a blasphemy case against the distressed Christian family if they continue to scrutinize Monica's status and Ahmed's involvement. The implications of such a threat cannot be overstated - individuals accused of blasphemy often become targets for violence and even lynchings by radical Muslim extremists, even when they are proven innocent, or the 'evidence' against them is of poor quality and dubious veracity.

Nonetheless, Monica's family has received the help of advocacy organizations that have assisted in filing an application requesting intervention by Dr. Shoaib Suddle, Chairman of the One Man Commission for Minorities, established by the Supreme Court.

In April 2026, Maria Asif, a Vehari resident and mother of 13-year-old **Maryam Asif Masih**¹⁷, returned from work one evening to find that the girl was not home. Before her disappearance, Maryam had been two months into an unofficial apprenticeship with 41-year-old Muhammad Kashif, a local artisan. Maria had accepted Kashif's offer to teach Maryam profitable skills so that she could help support her impoverished Christian family; this would also allow the girl's parents to work full-time without worrying about childcare.

On the night of Maryam's vanishing, Kashif's wife informed her that her husband had taken Maryam and fled; she was similarly unaware of the two missing people's location. Maria phoned her estranged husband, Asif Masih, who rushed to the scene with his own father and Maryam's grandfather, Zulfikar. The group filed an FIR at the Gaggoo Police Station but were discouraged by the authorities' disinterest in pursuing the rescue of the barely-teenaged girl.

In light of local police's negligence, Maria, Asif, and Zulfikar sought help from the Vehari District Police Officer, who reprimanded the municipal branch and directed them to prioritize the case. Rather than springing into action, the Gaggoo Police authorities became antagonistic to the family, annoyed that they had contacted his superior and caused him to be chastised. Sub-Inspector Muhammad Shafique even verbally attacked Maria and told her that Maryam would never return.

Weeks later, Maria was informed that her daughter had allegedly testified to a magistrate in Lahore that she had converted to Islam and willingly married Kashif. Maria contested the marriage registration, which falsely stated Maryam's age as 19, despite the fact that her birth year is 2013; she also criticized the court for not requesting documentation of age before accepting Maryam's statement at face value. Nonetheless, Maria's suspicions went unaddressed, and Sub-Inspector Shafique recommended that the family stop their efforts to rescue Maryam.

The girl's grandfather, Zulfikar, learned from peers at the local evangelical church he attended that Kashif had purportedly committed these acts before, even selling his girl victims to human traffickers. Maryam's family has obtained legal counsel from attorney Zunaira Patrick, who is working to rescue the girl and press charges against Kashif.

On 15 May 2026, **Minahil* Nadeem**, a 16-year-old Christian girl and a student of class 9 from Chak No. 134/16-L, Tehsil Mian Channu, District Khanewal, was abducted and taken to Sialkot. Minahil's father, Nadeem Abbas, a mason, filed a complaint at Police Station Saddar Mian Channu, resulting in registration of FIR No. 507/2026 dated 16 May 2026 under Section 365-B of the Pakistan Penal Code (PPC).

Two weeks after the abduction, police recovered Minahil during a raid at RB Café Hotel in Sialkot and arrested the accused, Ansar Allah Ditta. On 29 May 2026, Minahil was produced before the Judicial Magistrate Sohail Anjum, wherein she stated that she wants to marry Ansar Allah Ditta. Judicial Magistrate observed that a minor child cannot legally enter into marriage and directed that Minahil be placed in Dar ul Aman, Khanewal.

On 30 May 2026, Minahil underwent a medical examination at THQ Hospital, Mian Channu. The medical report confirmed sexual activity between the abductee and the accused. Biological samples were forwarded to the Punjab Forensic Science Agency (PFSA) for DNA analysis; the final PFSA report is pending.

Minahil's father, Nadeem Abbas, filed an application before the Judicial Magistrate, Mian Channu, seeking to add in the FIR an offence under section 376 (iii) of the PPC (rape of a child), and requesting that custody of the minor girl be returned to her parents.

On 4 June 2026, Minahil recorded a statement before Judicial Magistrate Zafar Iqbal under section 164 Cr.P.C. in which she stated that she had accompanied Ansar Allah Ditta voluntarily, that no one had abducted or raped

her, and that she wished to marry him. Following submissions by counsel for the complainant, the magistrate sent Minahil to Dar ul Aman and Ansar Allah Ditta to judicial custody in District Jail Khanewal.

Minahil filed an application for her release from Dar-ul-Aman, which was admitted for hearing. On 18 June 2026, Minahil stated before the judicial magistrate, Mian Channu, Muhammad Sohail Anjum, that she had embraced Islam, and that she wished to be released from Dar-ul-Aman. She also alleged that Hanif Hameed Mattu Advocate had issued death threats to her during a visit to Darul Aman and expressed fear for her life and safety from her family and the lawyer. The Judicial Magistrate directed her return to the Shelter Home, Khanewal.

Minahil lied in the statement made under duress of police and Darul Aman officials before the judicial magistrate regarding death threats, conversion, and intent to marry. Judicial Magistrate Sohail Anjum himself dictated to the minor girl to state in her testimony that she faced threats from her family and their legal counsel, despite the absence of such facts. Learned counsel for the petitioner's father, Hanif Hameed Mattu Advocate, argued that a minor has no legal capacity to contract marriage or change religion on her own, and any form of cohabitation, before attaining the age of eighteen years, with or without consent, is classified as child abuse and is a legally punishable offense. Moreover, he requested the judicial magistrate to interpret the relevant laws governing minors, and cited Lahore High Court's judgment (W.P. No.45156 of 2019) authored by Justice Tariq Saleem Sheikh in favour of his arguments, and requested the judicial magistrate to restore Minahil's custody to her parents.

On 23 June 2026, Minahil stated before the judicial magistrate, Muhammad Sohail Anjum, that a Muslim woman, Shazia Mai, had converted her to Islam, and she felt safe with Shazia. Judicial Magistrate ordered Minahil's release from the shelter home, Khanewal, into the custody of Shazia Mai under strict police protection.

The case raises serious concerns regarding the conduct of judicial, police, and shelter-home officials, particularly the possibility that the minor victim was induced or pressured to make statements under duress, including claims of conversion and an intention to marry the accused. The court decision placed the minor in the custody of a person other than her legal guardians, who have a connection with the accused, which is inconsistent with child-protection principles and merits careful legal scrutiny.

Given Minahil's age, the medical findings indicating sexual activity, the circumstances of abduction, and the sequence of events, the statements attributed to the minor girl require careful examination for possible coercion, undue influence, or manipulation. The available facts suggest that the accused have subjected the minor girl to sexual exploitation during two weeks of illegal confinement, without any lawful marriage having taken place. The facts also indicate that the accused and his associates had opportunities to exert pressure on the minor girl during confinement and while she was in the shelter home, which could have affected her questionable statements before the Judicial Magistrate.

*Real name of the girl has been changed to protect her identity.

Appendix A References

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- ⁸ Nasir Iqbal, “FCC questions integrity of Nadra records in custody case”, 7 May 2026.
- ⁹ Morning Star News, “Muslims Kidnap 12-Year-Old Christian Girl in Pakistan”, 5 February 2025.
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- ¹⁴ Morning Star News, “Christian Girl in Pakistan Abducted, Converted/Married”, 23 June 2025.
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- ¹⁶ Christian Daily International, “Kidnapped Christian woman in Pakistan forcibly converted, married, brother says”, 26 November 2025.
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APPENDIX B

List of Cases, 2019 - 2025

#	Date	Name	Age	District	Province
1	Jan. 2019	Christine Jalil	13	Faisalabad	Punjab
2	Feb. 2019	Saima Iqbal	35	Rawalpindi	Punjab
3	Feb. 2019	Sadaf Khan	13	Bahawalpur	Punjab
4	Feb. 2019	Sheeza Riasat	15	Gujranwala	Punjab
5	Feb. 2019	Shazia Bibi	14	Lahore	Punjab
6	Mar. 2019	Rimsha Javed	15	Lahore	Punjab
7	Mar. 2019	Nida	11	Hyderabad	Sindh
8	Apr. 2019	Areesha	14	Lahore	Punjab
9	Apr. 2019	Neha Pervaiz	14	Karachi	Sindh
10	Apr. 2019	Malika Sabir	13	Lahore	Punjab
11	Apr. 2019	Sadaf Emmanuel	12	Lahore	Punjab
12	May 2019	Sara Aslam	17	Sheikhupura	Punjab
13	May 2019	Sania Latif	15	Faisalabad	Punjab
14	May 2019	Sheetal Asghar	17	Sheikhupura	Punjab
15	June 2019	Neha Khawar	16	Lahore	Punjab
16	June 2019	Beenish	14	Sheikhupura	Punjab
17	June 2019	Saima Riaz	15	Faisalabad	Punjab
18	July 2019	Pumy Muskan	14	Sargodha	Punjab
19	July 2019	Saima Sardar	30	Faisalabad	Punjab
20	July 2019	Beenish Imran	14	Lahore	Punjab
21	Aug. 2019	Kanwal	17	Gujrat	Punjab
22	Sept. 2019	Sobia	22	Kasur	Punjab
23	Sept. 2019	Faiza Mukhtar	15	Sheikhupura	Punjab
24	Sept. 2019	Samara Munir	14	Faisalabad	Punjab
25	Oct. 2019	Mahek Bashir	14	Faisalabad	Punjab
26	Oct. 2019	Charlotte Javed	13	Faisalabad	Punjab
27	Oct. 2019	Huma Younas	14	Karachi	Sindh
28	Nov. 2019	Reeha Saleem	16	Gujrat	Punjab
29	Jan. 2020	Saneha Sabir	14	Lahore	Punjab
30	Mar. 2020	Komal Patras Saleem	18	Lahore	Punjab
31	Mar. 2020	Saima Javed	12	Sahiwal	Punjab
32	Apr. 2020	Myra Shehbaz	14	Faisalabad	Punjab
33	June 2020	Mehwish Hadayat	22	Lahore	Punjab
34	June 2020	Farzana Sohail	12	Faisalabad	Punjab
35	June 2020	Farah Shaheen	13	Faisalabad	Punjab
36	July 2020	Saneha Kinza	15	Faisalabad	Punjab
37	Sept. 2020	Sheeza Maqsood	16	Faisalabad	Punjab
38	Sept. 2020	Mehak Siddique	13	Vehari	Punjab
39	Oct. 2020	Shama	25	Gujranwala	Punjab
40	Oct. 2020	Mehwish Haroon	13	Lahore	Punjab
41	Oct. 2020	Arzoo Raja	13	Karachi	Sindh
42	Dec. 2020	Sanam Munir	13	Okara	Punjab
43	Jan. 2021	Mashal Rafique	17	Rawalpindi	Punjab
44	Jan. 2021	Neha Munawar	13	Muzaffargarh	Punjab
45	Feb. 2021	Sawera Khalid	13	Lahore	Punjab

46	Feb. 2021	Mishal Adnan Naveed	15	Karachi	Sindh
47	Feb. 2021	Shabana Bibi	21	Lahore	Punjab
48	Feb. 2021	Mehwish Patras	14	Gujranwala	Punjab
49	Feb. 2021	Shakaina Johnson	13	Lahore	Punjab
50	Mar. 2021	Kiran Bashir	16	Lahore	Punjab
51	Mar. 2021	Beenish Javaid	15	Lahore	Punjab
52	Mar. 2021	Sunaina James	14	Gujranwala	Punjab
53	Mar. 2021	Muskan Sabir	19	Sialkot	Punjab
54	Apr. 2021	Maham Niaz	7	Lahore	Punjab
55	Apr. 2021	Neha Razaqat	14	Rawalpindi	Punjab
56	Apr. 2021	Amsal Haroon	16	Gujranwala	Punjab
57	May 2021	Saba Sattar	16	Lahore	Punjab
58	May 2021	Shanza	14	Sukkur	Sindh
59	May 2021	Nayab Shahid Gill	14	Gujranwala	Punjab
60	June 2021	Abroo Majeed	18	Gujranwala	Punjab
61	June 2021	Sandhia	14	Gujranwala	Punjab
62	June 2021	Shama Baboo Masih	14	Karachi	Sindh
63	July 2021	Shamim Bibi	25	Sheikhupura	Punjab
64	July 2021	Alesha Nadeem Masih	9	Hyderabad	Sindh
65	July 2021	Samina Anwer	16	Nankana Sahib	Punjab
66	July 2021	Kainat	16	Lahore	Punjab
67	July 2021	Saira Waris	17	Gujranwala	Punjab
68	July 2021	Chashman Kanwal Gulzar	14	Faisalabad	Punjab
69	July 2021	Reena Nazir	17	Faisalabad	Punjab
70	Aug. 2021	Mehwish	14	Sheikhupura	Punjab
71	Aug. 2021	Princy Francis	14	Haripur	Khyber Pakhtunkhwa
72	Aug. 2021	Muqadas Nadeem	16	Jhang	Punjab
73	Aug. 2021	Simran Iqbal	16	Nankana Sahib	Punjab
74	Aug. 2021	Shiza Ghafoor	15	Nankana Sahib	Punjab
75	Aug. 2021	Mumtaz Bibi	38	Faisalabad	Punjab
76	Aug. 2021	Beenish	20	Lahore	Punjab
77	Aug. 2021	Anita Emmanuel	18	Bahawalpur	Punjab
78	Sept. 2021	Liza Younas	8	Karachi	Sindh
79	Sept. 2021	Nisha Sattar	17	Sheikhupura	Punjab
80	Sept. 2021	Asher Siddique	15	Lahore	Punjab
81	Oct. 2021	Rimsha Iqbal	16	Bahawalpur	Punjab
82	Oct. 2021	Misbah Imdad	17	Faisalabad	Punjab
83	Nov. 2021	Merab Abbas	12	Sahiwal	Punjab
84	Nov. 2021	Saba Bibi	15	Bahawalpur	Punjab
85	Dec. 2021	Zarish	17	Kasur	Punjab
86	Dec. 2021	Angel	15	Kasur	Punjab
87	Jan. 2022	Mahnoor Ashraf	14	Lahore	Punjab
88	Jan. 2022	Naima/Haleema Javed	15	Lahore	Punjab
89	Feb. 2022	Hina Mukhtar	22	Sheikhupura	Punjab
90	Feb. 2022	Mariam Ashraf	14	Sahiwal	Punjab
91	Mar. 2022	Aliza Naeem Akhter	20	Faisalabad	Punjab
92	Mar. 2022	Neha Tufail Masih	15	Gujranwala	Punjab
93	Mar. 2022	Parsicla Dilwar	15	Faisalabad	Punjab
94	Apr. 2022	Zarvia Pervaiz	12	Rawalpindi	Punjab
95	May 2022	Fiza Irfan	12	Toba Tek Singh	Punjab

96	May 2022	Saba Nadeem	15	Faisalabad	Punjab
97	June 2022	Mehwish Razzaq	15	Faisalabad	Punjab
98	June 2022	Mishal	18	Lahore	Punjab
99	June 2022	Meerab Polous	15	Faisalabad	Punjab
100	July 2022	Maha Asif	12	Lahore	Punjab
101	July 2022	Mariam David	15	Karachi	Sindh
102	July 2022	Merab Mohsin	16	Karachi	Sindh
103	July 2022	Merry Afzal	17	Sahiwal	Punjab
104	July 2022	Muni Kanwal Yousif	16	Okara	Punjab
105	Aug. 2022	Muqadas Anwar	22	Faisalabad	Punjab
106	Sept. 2022	Kinza Sindhu	14	Lahore	Punjab
107	Sept. 2022	Muskan Ashiq	14	Faisalabad	Punjab
108	Sept. 2022	Riya Kayanat	15	Faisalabad	Punjab
109	Nov. 2022	Rija Pervaiz	16	Lahore	Punjab
110	Dec. 2022	Sitara Arif	15	Faisalabad	Punjab
111	Dec. 2022	Hurab Basharat	13	Faisalabad	Punjab
112	Dec. 2022	Mishal Rasheed	15	Okara	Punjab
113	Jan. 2023	Mehak Pervaiz	14	Narowal	Punjab
114	Jan. 2023	Sania Bibi	15	Rawalpindi	Punjab
115	Jan. 2023	Samreen Aftab	15	Faisalabad	Punjab
116	Feb. 2023	Naina Ashraf	13	Lahore	Punjab
117	Mar. 2023	Sheeza	14	Nankana Sahib	Punjab
118	Mar. 2023	Kiran	13	Sahiwal	Punjab
119	Apr. 2023	Monica	13	Lahore	Punjab
120	Apr. 2023	Sehar Munawar	13	Okara	Punjab
121	Apr. 2023	Angel	14	Faisalabad	Punjab
122	May 2023	Muskan Liaquat	14	Sheikhupura	Punjab
123	May 2023	Angel Robin	14	Lahore	Punjab
124	May 2023	Muskan Asghar	16	Gujranwala	Punjab
125	May 2023	Silvia Babar	16	Faisalabad	Punjab
126	June 2023	Numra Faryad	17	Gujranwala	Punjab
127	June 2023	Ateeqa Shakeel Sharif	23	Bahawalpur	Punjab
128	July 2023	Rumi Kiran	25	Vehari	Punjab
129	July 2023	Shazia	30	Lahore	Punjab
130	July 2023	Angel Sarfraz	15	Karachi	Sindh
131	July 2023	Sania Basharat	16	Lahore	Punjab
132	Aug. 2023	Kinza Khuram	13	Faisalabad	Punjab
133	Aug. 2023	Hira Imran	16	Lahore	Punjab
134	Sept. 2023	Mariam Farooq	16	Gujranwala	Punjab
135	Sept. 2023	Muqadas	13	Gujranwala	Punjab
136	Oct. 2023	Christina* Razzaq	12	Toba Tek Singh	Punjab
137	Oct. 2023	Yarosha Saleem	11	Sheikhupura	Punjab
138	Nov. 2023	Shifa Rafaqat	14	Sheikhupura	Punjab
139	Nov. 2023	Nisha Aslam	16	Kasur	Punjab
140	Jan. 2024	Salma	18	Sheikhupura	Punjab
141	Feb. 2024	Laiba Suhail	10	Faisalabad	Punjab
142	Feb. 2024	Anmol Kiran	23	Rawalpindi	Punjab
143	Mar. 2024	Kainat Pervaiz	16	Nowshera	Khyber Pakhtunkhwa
144	Mar. 2024	Alishba Iftikhar	20	Lahore	Punjab
145	Mar. 2024	Muskan Suleman	15	Badin	Sindh
146	Mar. 2024	Roshni Shakeel	13	Multan	Punjab

147	Mar. 2024	Mehak Younis	14	Sialkot	Punjab
148	Apr. 2024	Angela Hameed	17	Lahore	Punjab
149	Apr. 2024	Sania Ameen	14	Sialkot	Punjab
150	Apr. 2024	Mona Fazal	14	Jamshoro	Sindh
151	Apr. 2024	Angel George	16	Lahore	Punjab
152	Apr. 2024	Nisha Nazeer	20	Faisalabad	Punjab
153	May 2024	Sara Saleem	17	Faisalabad	Punjab
154	May 2024	Beenish Nazeer	16	Sialkot	Punjab
155	June 2024	Huma Allah Ditta	18	Lahore	Punjab
156	June 2024	Naila Sadiq	17	Sialkot	Punjab
157	June 2024	Saneha Nazir	14	Lahore	Punjab
158	June 2024	Muqadas Arif	16	Kasur	Punjab
159	June 2024	Sana Javed	18	Lahore	Punjab
160	June 2024	Alina Khalid	14	Rawalpindi	Punjab
161	June 2024	Wardah Emmanuel	15	Faisalabad	Punjab
162	July 2024	Alina Imran	17	Rawalpindi	Punjab
163	July 2024	Jasmine Christopher	15	Karachi	Sindh
164	July 2024	Neha Javed	13	Kasur	Punjab
165	July 2024	Saneha Javed	18	Kasur	Punjab
166	Aug. 2024	Mehak Victor John	21	Kasur	Punjab
167	Aug. 2024	Fairy Shoukat	12	Kasur	Punjab
168	Sept. 2024	Diya Aslam	17	Lahore	Punjab
169	Sept. 2024	Muskan Anwar	16	Karachi	Sindh
170	Sept. 2024	Alishba Sohail	18	Multan	Punjab
171	Sept. 2024	Saneha Shahbaz	16	Lahore	Punjab
172	Sept. 2024	Diya Iftikhar	16	Faisalabad	Punjab
173	Oct. 2024	Kiran	20	Khanewal	Punjab
174	Oct. 2024	Angel Shoukat	11	Karachi	Sindh
175	Oct. 2024	Alishba	13	Karachi	Sindh
176	Nov. 2024	Sheryl Babar	14	Gujranwala	Punjab
177	Nov. 2024	Khalida George	19	Jamshoro	Sindh
178	Nov. 2024	Sonia Tariq	15	Lahore	Punjab
179	Dec. 2024	Jessica	16	Karachi	Sindh
180	Jan. 2025	Sataish Mazhar	17	Lahore	Punjab
181	Jan. 2025	Sana	15	Lahore	Punjab
182	Jan. 2025	Ariha Pervaiz	13	Okara	Punjab
183	Jan. 2025	Diana* Yousaf	15	Sialkot	Punjab
184	Jan. 2025	Aria Gulzar	14	Okara	Punjab
185	Jan. 2025	Saba Shafiq	13	Lahore	Punjab
186	Jan. 2025	Saneha Sharif	14	Sialkot	Punjab
187	Feb. 2025	Saneha Asher	14	Faisalabad	Punjab
188	Apr. 2025	Jessica Ishfaq	17	Faisalabad	Punjab
189	Apr. 2025	Jessica Iqbal	16	Lahore	Punjab
190	Apr. 2025	Abigail Zoe	16	Tando Muhammad Khan	Sindh
191	May 2025	Nisha Abass	14	Lahore	Punjab
192	May 2025	Victoria* Shahzad	16	Nankana Sahib	Punjab
193	May 2025	Kiran Javed	15	Multan	Punjab
194	May 2025	Afia Riaz	15	Gujranwala	Punjab
195	June 2025	Mahnoor	15	Lahore	Punjab
196	June 2025	Alishba Adnan	14	Vehari	Punjab
197	June 2025	Sadaf Mahmood	17	Lahore	Punjab

198	June 2025	Khatija Shahbaz	15	Lahore	Punjab
199	July 2025	Shamraiz	15	Sargodha	Punjab
200	July 2025	Neha Musa	19	Bahawalpur	Punjab
201	July 2025	Maria Shahbaz	13	Lahore	Punjab
202	Aug. 2025	Mariam Arshad	14	Bahawalpur	Punjab
203	Sept. 2025	Sanam Razzaq	17	Faisalabad	Punjab
204	Oct. 2025	Muskan Francis	22	Lahore	Punjab
205	Oct. 2025	Sawera Mushtaq	17	Khushab	Punjab
206	Oct. 2025	Uzma	18	Faisalabad	Punjab
207	Oct. 2025	Meerab Patras	17	Lahore	Punjab
208	Nov. 2025	Monica Jennifer	21	Rawalpindi	Punjab
209	Dec. 2025	Ramesha	17	Khushab	Punjab
210	Dec. 2025	Aneeqa Fiaz	14	Sheikhupura	Punjab

***Real names of some girls have been changed to protect her identity**

APPENDIX C

Case Documents

- 1 Police registered the following FIR six months after the abduction of 11-year-old **Yarosha Saleem** from Sheikhpura, under sections 498-B of PPC (forced marriage) and sections 4 and 5 of The Child Marriage Restraint Act. Eventually, the custody of the minor girl was handed over to her parents.

		پولیس فارم نمبر 24-5-1 ابتدائی اطلاعی رپورٹ نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 154 مجرہ ضابطہ فوجداری		سرگرم نمبر: SKP-FRW-016955 Citizen Feedback 	
تاریخ رویت وقوعہ: 10.10.2023		فروزوالہ: 1569/24 قحانہ: فیروزوالہ ضلع: شیخوپورہ ای بک نمبر: Ferozewala-4/8/2024-3259			
1	تاریخ رویت رپورٹ	2	تاریخ رویت رپورٹ	3	تاریخ رویت رپورٹ
09-04-2024 08:00 AM	6	قحانہ سے روایت کی تاریخ وقت	08-04-2024 01:50 PM	09-04-2024 08:00 AM	08-04-2024 01:50 PM
نام و سکونت اطلاع دہندہ مستفیض سلیم بلال ولد سروران: پتہ: سڑک نمبر 31 تا سیرت روڈ نزد گل چوک کوٹ کبیر لاہور، (پیشگی کار نمبر: 3-2735023-35202 فون نمبر: 03004658986)		مختصر کیفیت جرم (معدہ دفعہ) کو مل اگر کچھ کمی گئی ہے بجریہ: تہذیب 498B THE CHILD MARRIAGE RESTRAINT ACT 1929 - 4- THE CHILD MARRIAGE RESTRAINT ACT 1929 - 5-			
جائے وقوعہ و فاصلہ قحانہ سے اور سمت بھدرہ راجہ 45 کون بلا صلا 6 کلومیٹر جانب جنوب از قحانہ بیٹ نمبر: 6 رانا 45 کون		کارروائی متعلقہ تفتیش اگر اطلاع درج کرنے میں کچھ توقف ہوا ہو تو اس کی وجہ بیان کی جائے 7298456			

دستخط: محمد حامد فیض رسول بیک نمبر: 2017/SKP ASI محمد: ٹیلی فون نمبر: 03454219618

بخدمت جناب SHO صاحب قحانہ فیروزوالہ ضلع شیخوپورہ درخواست برائے اندراج مقدمہ بر خلاف عمران سر فراز ولد محمد سر فراز 22 ریمانڈ پی بی زوجہ سر فراز ساکنان ڈاکخانہ فیروزوالہ شیخوپورہ 3 نکاح خواجہ گوہان نکاح 4 نکاح رجسٹرڈ جناب عالی گزارش ہے کہ سائل محنت مزدوری کرتا ہوں اور سبکی مذہب سے تعلق ہے مورخہ 27.03.24 کو قحانہ فیروزوالہ سے بذریعہ پولیس ملازمین سائل کو اطلاع ملی کہ کل مورخہ 28.03.24 کو اپنی بیٹی پردشہ کو معزز عدالت ASI فیروزوالہ پیش کریں جس پر سائل بمعدہ اپنے قریبی رشتہ دار سلاسل جان ولد بشیر مٹو نیل اور سلیم اقبال کو لے کر عدالت حضور میں پیش ہوا تو پتہ چلا کہ الزام علیہ نمبر 2 جسے بے جا کی پیشینہ برائے پیش کرنے سائل کی بیٹی الزام علیہ نمبر 2 کی بہو اور الزام علیہ عمران سر فراز کی بیوی کو جو کہ مسلمان ہو چکی ہے برائے پیش کرنے عدالت دائر کر رکھی ہے یہ کہ سائل نے معزز عدالت میں اپنی بیٹی پردشہ اور اس کا پیدا انٹی سرٹیفکیٹ جس کے مطابق سائل کی بیٹی کی عمر 11 سال ہے معزز عدالت میں پیش کیے جس پر معزز عدالت نے پیشینہ خارج فرمادی عدالت حضور میں پیشینہ کے ساتھ سائل کی بیٹی کا نکاح نامہ لف تھا جس میں نکاح کی تاریخ 10.10.2023 درج تھی یہ کہ سائل کی بیٹی کی عمر کا تمام الزام علیہان کو بتو بی علم تھا اس کے باوجود اپنی بیٹی کی خاطر سائل کی معصوم اور نا بالغ بیٹی کو زبردستی مذہب تبدیل کر دیا اور وہ غلام پھلا کر قبول اسلام اور زبردستی نکاح کر دیا کہ سائل کو سخت زیادتی کی ہے الزام علیہان مسلسل سائل کو قتل کرنے کی دھمکیاں دے رہے ہیں۔ استدعا ہے کہ قانونی کارروائی کی جائے۔

عرضے نشان انگو فیہ سلیم بلال مستفیض مذکور۔ از قحانہ: اس وقت ایک تحریری درخواست اذان مستفیض مندرجہ بالا خانہ نمبر 2 بمعنون عنوان بالا بغرض اندراج مقدمہ قحانہ میں موصول ہوئی جو معنون تحریر درخواست سے درست صورت جرم 498B تہذیب 4/5 پائلڈ میرج ریٹرن ایکٹ پائی جاکر رپورٹ ابتدائی مذکور مرتب کر کے اصل تحریری درخواست مقدمہ نقل FIR بغرض تفتیش بدست واصل

C/1612 معقب خالد جاوید SI فون نمبر 03008130005 اور سال ہے جناب SHO صاحب کو بھی مقدمہ مذکور کی نسبت مطلع کیا گیا ہے۔

محمد حامد فیض رسول ASI
08-04-2024

- [illegible]

- 3 Police registered an FIR under section 365-B of PPC (abduction) in the case of 14-year-old **Alina Khalid** from Islamabad/Rawalpindi. The court ordered custody of the minor girl to her abductor or purported husband.

(7) Ammex - A

سیریل نمبر: 2147483647

پولیس لارم نمبر: 5-24(1)

ایڈیشنل ایس ایچ آر پولیس ٹیسٹ، جرم قابل دست اندازی پولیس واپس شدہ ڈیوڈ 154 مجبورہ ضابطہ فوجداری

نمبر: 1066/24 تھانہ: مکتہ ضلع: اسلام آباد ای ٹی نمبر: KAN-6/25/2024-1827

1	تاریخ و وقت رپورٹ	بکوالر نمبر (31) 25-06-2024 04:35 PM	6	تھانہ سے روانگی کی تاریخ و وقت	Online
2	نام و سکونت اطلاع دہندہ مستفیض	خالد مسیح ولد شنگارا مسیح، پتہ: سکندریہ مسجد اسلام آباد شناختی کارڈ نمبر: 7-1261947-61101 فون نمبر: 03089264285			
3	مختصر کیفیت جرم (معدومہ) وال اگر کچھ کھو گیا ہے	بجریم: تپ 365B			
4	جائے وقوعہ و فاصلہ تھانہ سے اور سمت	بعد رقبہ ضیاء مسجد بقاصہ قریب 02 کلومیٹر بہانہ شمال از تھانہ			
5	کارروائی متعلقہ تفتیش اگر اطلاع درج کرنے میں کچھ توقف ہوا ہو تو اس کی وجہ بیان کی جاوے	حسب آدہ تحریری درخواست مقدمہ درج رجسٹر ہوا۔			

دستخط: Zahid Mehmood نیٹ نمبر: 1089-ID عہدہ: ASI ٹیلی فون نمبر: 03009718173

(ایڈیشنل اطلاع نیچے درج کریں)

بخدمت جناب SHO صاحب تھانہ مکتہ اسلام آباد جناب عالی مودبانہ گزارش یکہ مسائل آپ کے تھانہ کی حد و ضیاء مسجد کئی نمبر 12 کاروائی ہے اور سالہ کی بیٹی عیسیٰ جسکی عمر تقریباً 14 سال ہے اور تالیف اسکو ہمارے بڑی جوتھاب کا کام کرتے ہیں حیدر علی اور کی نامی لڑکوں نے حرام کاری کے لئے اغواء کر لیا ہے اور: معلوم مقام پر قتل کر دیا ہے مسائل کا تعلق کر چکن کیوٹی ہے اور قوی امکان ہے کہ میری بیٹی کے ساتھ غلط کاری کر کے اسے موت کے گھاٹ اتار دیا جائے گا سالہ کی بیٹی تالیف ہے اور اسکو حیدر علی اور کی وغیرہ نے بہانہ پھسلا کر کے اغواء کر لیا ہے مسائل کو سخت پریشانی ہے کہ میری بیٹی کے ساتھ کوئی بڑا سانحہ رونما ہو جائے جناب سے التماس یکہ میری بیٹی کو اغواء کرنے والوں کے خلاف سخت سے سخت قانونی کارروائی عمل میں لائی جائے اور میری بیٹی جو تالیف ہے اسکو بازیاب کرایا جائے اور ہمیں قوی طلب یکہ اس اغواء میں مراد علی شاہنائی لڑکے بھی ملوث ہیں اور ریکارڈ یافتہ ہیں کے خلاف بھی قانونی کارروائی عمل میں لائی جائے اور ہمیں انصاف فراہم کیا جائے العارض دستخط بحروف انگریزی مسائل خالد مسیح ولد شنگارا مسیح سکندریہ مسجد اسلام آباد موبائل نمبر 03089264285/034221078201 کاروائی پولیس: مسائل بالائے تحریری درخواست بھاضری تھانہ دی جو حرف بحرف درج بالا ہوئی تحریر منہمور درخواست و حالات سے مردست صورت جرم 365B تپ پائی جا کر ابتدائی اطلاعی رپورٹ جرم مذکور درج رجسٹر کی جناب SHO صاحب علاقہ تھانہ میں ہے جسکو اطلاع بابت اندراج مقدمہ ہڈی جاری ہے محرر بعد تکمیل ریکارڈ نقول FIR جائیجاہاز الفرائن کو ارسال کرے FIR: اے تفتیش حوالے SSIU پٹ کرے۔

ASI Zahid Mehmood
25-06-2024

*Image has been digitally adjusted for legibility purposes

- 4 Police registered an FIR under section 365-B of PPC (abduction) in the case of 13-year-old **Maria Shahbaz** from Lahore. The Federal Constitutional Court ordered custody of the minor girl to her abductor or purported husband, rather than her parents.

Authentication

پولیس فارم نمبر: 15-24 (15)

LHR-NWT-043108

Citizen Feedback

ابتدائی اطلاع دہندہ جرم قابل دست اندازی پولیس رجسٹر شدہ دہندہ نمبر 154 محمود شاہد فوجداری

نمبر: 5144/25 قاتل: نواب ٹاؤن ضلع: لاہور ایفک نمبر: NT-29/07/2025-9042

تاریخ وقت: 29-07-2025 05:30 AM

31-07-2025 08:00 AM	6 قاتل سے روائی کی تاریخ وقت	نمبر: 80 (80)	30-07-2025 03:05 AM
شہباز شکیلا بیگم، پتہ: ڈاک خانہ لاہور شہر، تحصیل لاہور، ضلع لاہور		نام و سکونت اطلاع دہندہ مستفیض	
35202-1302128-5-35202 فون نمبر: 03000334559		مختصر کیفیت جرم (معدومہ) مال اگر کچھ کھو گیا ہے	
مرتبہ: ASI قاتل نواب ٹاؤن لاہور		363 تپ	
از سولہ روہ بلاصلہ 2 کلومیٹر جانب جنوب		4 جائے وقوعہ و قاتل قاتل سے اور سمت	
بیلہ نمبر: 2 نواب ٹاؤن		5 کاروائی متعلقہ تفتیش اگر اطلاع درج کرنے میں کچھ توقف ہوا تو اس کی وجہ بیان کی جائے	
حسب آدہ تحریر درخواست مقدمہ درج رجسٹر ہوا			

دستخط: غلام حسین

پلاٹ نمبر: 2471L

مہمہ: SI

بیلہ نمبر: 03009482381

(ابتدائی اطلاع دہندہ درج کریں)

بخدمت جناب ایس ایچ او صاحب قاتل نواب ٹاؤن لاہور جناب عالی گزارش میکر میں کسی شہرہ راز و نجس شخص ساکن محلہ رنول پورہ شوکر نیاز بیگ لاہور کارہائیں ہوں مورخہ 29/7/25 بوقت 5:30 بجے میری بیٹی مسماہ ماریہ شہباز بھر تقریباً 13/14 سال گھر سے ناشہ لینے کیلئے گئی تو واپس نہ آئی جسکو ہم اپنے طور پر تلاش کرتے رہے ہیں ہوتا حال واپس نہ آئی ہے مجھے قوی یقین ہے کہ میری بیٹی ماریہ شہباز کو کسی نامعلوم نے اغوا کر لیا ہے لہذا نامعلوم نے اغوا کر لیا ہے لہذا نامعلوم کے خلاف مقدمہ درج کر کے میری بیٹی کو برآمد کیا جائے العبدہ سیکھ بچہ و فروف و نشان انکھو نا شہباز مسماہ ماریہ شہباز میں کمرہ تفتیش میں موجود و نکہ ایک تحریری درخواست فرسٹ ڈسک سے بارک شدہ موصول ہوئی جو مضمون درخواست حالات واقعات سے سر دست صورت جرم 363 تپ پائی جاتی ہے مقدمہ درج رجسٹر کر کے تفتیش حوالے INV ونگ کی جائے دستخط بچہ و فروف اردو رحمت ASI قاتل نواب ٹاؤن لاہور تفتیشی بوقت 3 بجے رات مورخہ 30/7/25 از قاتل حسب آدہ تحریر درخواست مقدمہ درج رجسٹر کر کے اصل تحریر درخواست مع نقل FIR بغرض تفتیش بدست ارندہ کنسٹیبل عقب انچارج انوسٹی گیشن ارسال ہے جناب SHO صاحب کو مقدمہ حذا کی بابت مطلع کیا گیا ہے۔

غلام حسین SI

30-07-2025

*Image has been digitally adjusted for legibility purposes

- 5 Marriage certificate of a 13-year-old, **Roshni Shakeel** from Multan, which falsely shows her as an adult and self-sufficient.

نکاح نامہ

410

26

36303-44717252-5

36303-2209630-9

18 سال

11-03-2024

5000 روپے حق المیراد رستہ

5000 روپے حق المیراد رستہ

11-03-2024

نکاح نامہ

410

26

36303-44717252-5

36303-2209630-9

18 سال

11-03-2024

5000 روپے حق المیراد رستہ

5000 روپے حق المیراد رستہ

11-03-2024

*Image has been digitally adjusted for legibility purposes

6



- 7 Marriage certificate of a 13-year-old, **Maria Shahbaz** from Lahore, which obtained validation by the courts in Pakistan, despite that it was not properly filled, was without an identity card number, and falsely showed her as an adult.

The image shows two pages of a handwritten marriage certificate in Urdu. The left page contains the main text of the certificate, including the names of the bride and groom, the date, and the signatures of the witnesses and the registrar. The right page contains a list of 15 numbered points, likely a checklist or a list of conditions, and a section for the bride's and groom's details. The document is signed by a registrar and has a circular seal at the bottom.

*Image has been digitally adjusted for legibility purposes

- 8 A welfare NGO issued this certificate of conversion for 14-year-old **Nisha Abbas** from Lahore, which shows her as an adult and her Islamic name "**Maryam**". Her earlier name was changed after forced conversion.

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

اِنَّ الدِّينَ عِنْدَ اللَّهِ الْإِسْلَامُ

فون 0338-2568898

New Muslim Welfare Association Pakistan

Markazi Office: Jamia Masjid Ammer Hamza, Bilal Gunj, Lahore.

Regd NO: F-28/EDD-CDD (MPS) RA-VA OF 2003/28

سند اسلام

نیو مسلم ویلفیئر ایسوسی ایشن (پاکستان)

آج بتاریخ 15-02-2026 مطابق 2026

مسی اسماءہ شہیدہ بی بی صبر عیسیٰ

ابن بنت عیسیٰ

عمر 18 سال

مذہب مسیحی

شناختی کارڈ نمبر nil

غیر شادی شدہ / شادی شدہ

لاولہ / صاحب اولاد

رہائش مستقل

رہائش عارضی

نیو مسلم ویلفیئر ایسوسی ایشن لاہور (پاکستان) میں حاضر ہوئے / ہوئیں اور بلا جبر واکراہ اسلام لانے کی خواہش ظاہر کی، ان کی خواہش کے مطابق "کلمہ طیبہ" اور "کلمہ شہادت" کی تلقین کی گئی اور وہ ارکان اسلام کی تعلیم کے بعد دائرہ اسلام میں داخل ہو گئے / ہو گئیں اور ان کا اسلامی نام **مریم بی بی**

بچوں کا اسلامی نام بالترتیب **(کوئی نہیں)** رکھ دیا گیا۔

مسلمانوں سے درخواست ہے کہ اپنے اپنی اس نو مسلم بھائی / بہن کو اپنا اپنی دینی بھائی / بہن سمجھیں۔ دینی اور دنیوی امور میں ان سے تعاون کریں۔

اللہ تعالیٰ ہم سب کو دین اسلام پر استقامت نصیب فرمائیں۔ آمین

جس کے ہاتھ اسلام قبول کیا اس کا نام **عبد الرحمن**

مکواہ: **عبد الرحمن**

مکواہ: **ابن مسعود**

مہر جنرل سکریٹری

مہر صدر تنظیم

دستخط نو مسلم / یا نشان انگوٹھا: **Nisha**

- 9 A madrassah (seminary) issued this certificate of conversion for 15-year-old **Wardah Emmanuel** from Faisalabad, which shows her Islamic name "**Ayesha**". Her earlier name was changed after forced conversion.

JAMIA FARIDIA (Regd.)
SAHIWAL - PAKISTAN

PH: 040-4466985 4466985 Fax: 040-4460985 www.jamiefaridia.org.pk www.facebook.com/jamiefaridia

1214 تاریخ: 29/06/2024

Original

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ (المعراج: 208)

إِنَّا الْقَائِمِينَ بِهَذَا الطَّوِاقِ الْإِسْلَامِيِّ (المرآة: 19:3)

قبولیت اسلام

تصدیق کی جاتی ہے کہ مندرجہ ذیل کوائف کے حامل نے
زیر دستخطی کے زور پر اسلام قبول کیا۔ اللہ تعالیٰ جل مجدہ
استقامت بخشے۔
وصلی اللہ تعالیٰ علی حبیب سیدنا محمد وآلہ وصحبہ وبارک وسلم

قدیم نام وردہ جدید نام عائشہ ولدانکھ (بیمالہ شیاہ)

عمر 16 سال سابق مذہب عیسائیت ازدواجی حیثیت غمراہی شادی شادی کا رز نمبر 33102-1332482-2

مکہ مکہ 213 رب ذریعہ سال 1445ھ فیصلہ آباد

نچوں کے نام	قدیم	جدید
	/	/

دستخط/نشان انگوٹھا نو مسلم

دستخط جس کے زور پر اسلام قبول کیا

مہر

- 10 A madrassah (seminary) issued this certificate of conversion for 17-year-old **Jessica Ashfaq** from Faisalabad, which shows her Islamic name “**Tayyaba Fatima**”. Her earlier name was changed after forced conversion.

شہادۃ قبول اسلام

مدرسہ جامعہ دارالحفاظ

اہل سنت جماعت رجسٹرڈ پک 123 بج سب سید منورہ فیصل آباد

از دفتر
جامعہ دارالحفاظ

تصدیق کی جاتی ہے کہ جسینہ ولدیت اشفاق بیگم

ساکن 214 در مدرسہ دارالحفاظ سید منورہ فیصل آباد

قوم سید جو عسائی تھا آج مورخہ 22-04-07 کو جامعہ دارالحفاظ

میں اپنے عسائی سابق مذہب سے توبہ کر کے دائرہ اسلام میں داخل ہوا

اس کا اسلامی نام طیبہ خواجہ اشفاق بیگم

رکھا گیا دعا ہے کہ اللہ تعالیٰ اپنے محبوب پاک صاحب لولاک علیہ الصلوٰۃ والسلام کے صدقہ سے اسے مذہب حق، مذہب اہل سنت و جماعت پر قائم و دائم رکھے۔ آمین

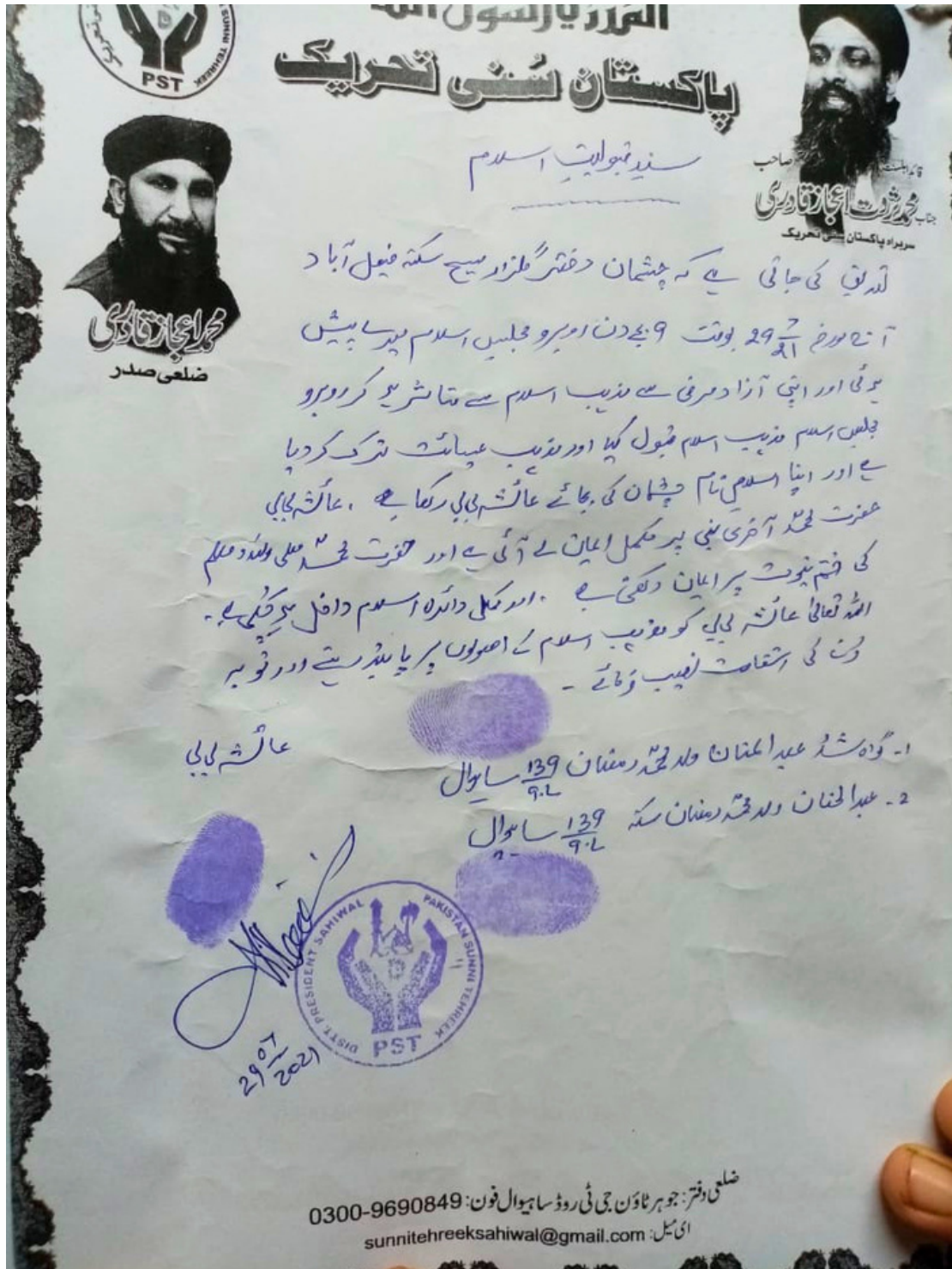
دستخط تاریخ 22-04-07

صاحبزادہ قاری عبد الجبار رضوی
مدرسہ جامعہ دارالحفاظ (رجسٹرڈ)
پک 123 بج سب سید منورہ فیصل آباد

صاحبزادہ
قاری عبد الجبار
رضوی
مدرسہ جامعہ دارالحفاظ فیصل آباد

*Image has been digitally adjusted for legibility purposes

- 11 A political party issued this certificate of conversion for a 14-year-old **Chashman Kanwal Gulzar** from Faisalabad, which shows that her earlier name was changed to the Islamic name “**Ayesha**” after forced conversion.



*Image has been digitally adjusted for legibility purposes

- 12 Islamabad High Court issued an order giving custody of 14-year-old **Alina Khalid** from Islamabad/Rawalpindi to her abductor or purported husband, rather than her parents, merely based on her coerced statement and fabricated documents.

JUDICIAL DEPARTMENT
W.P. No. 2635 of 2024

VERSUS **Assistant Commissioner, ICT Rural, etc.**

Khalid Masih

Serial No. of order of proceedings	Date of order of proceedings	Order with signatures of judge, and that of parties of counsel, where necessary.
1	02.10.2024	3 Mr. Muhammad Gulzar, Advocate for petitioner. Mr. Khalid Mahmood Dhoon, AA-G. Mr. Zaheer Farooq State counsel. Muhammad Husnain Ali Law Officer child Protection

On the preceding date i.e. 18.09.2024, learned AA-G was directed to file report on behalf of Child Protection Institute. Today, learned AA-G alongwith Law Officer, Child Protection Institute has filed the report.

Perusal of the same would reveal that the daughter of the petitioner out of her free will has desired to join her husband and in view of the same learned Assistant Commissioner (Pothar) has handed over the custody of the detainee to her husband. As per contents of the report, petitioner's daughter is presently residing with her husband. Disposed of as having become infructuous.

(ARBAB MUHAMMAD TAHIR)
JUDGE

Certified to Be True Copy
19 OCT 2024
30574 18/10/24
P-2
A.B. ANSARI

*Image has been digitally adjusted for legibility purposes

- 13 The Multan Bench of Lahore High Court dismissed the petition of 13-year-old **Roshni Shakeel**'s mother, seeking her recovery, and handed over the custody of the minor girl to her abductor or purported husband, rather than her parents.

FORM No. HCJD/C-121.
ORDER SHEET
IN THE LAHORE HIGH COURT
MULTAN BENCH, MULTAN.
JUDICIAL DEPARTMENT
Case No. Crl. Misc. No.1889-H/2024

S.No.of order/ Proceeding	Date of order/ Proceeding	Mst. Nazia	Versus	SHO, etc.
02.	25.03.2024	Order with signature of Judge, and that of parties of counsel, where necessary.		
Ch. Muhammad Umer Ashraf, Advocate with petitioner. Mr. Umar Farooq Khan, Addl. Prosecutor General with Umar SI along with record. Mr. Muhammad Bilal Hussain, Advocate for private respondents.				

In pursuance of order passed by the court, Umar SI, Police Station Seetal Mari, Multan appears before the court and produces the alleged detainee namely Roshni Shakeel (Zahra). She states before the court that she contracted marriage with Moazzam/respondent No.2 and now happily living with him. She further states that nobody abducted or detained her illegally.

Application No. 47591
Date of presentation 27.3.24
of Application 27.3.24
Date of Receipt of fee 27.3.24
No. of Words/Pages 2
Copying fee 1
Urgent fee 1
Registration & Postage fee 3
Agency fee 10
Court of and application 27.3.24
Total 27.3.24
Name of Counsel 27.3.24
The order was dictated, pronounced and signed on the same day.
Date of receipt of copy 27.3.24
Date of preparation 27.3.24
Date of issuance of Copy 27.3.24

Dismissed as withdrawn.

(Ali Zia Bajwa)
Judge

EXAMINER COPY SUPPLY SECTION
27.3.24
AUTHORISED UNDER ARTICLE 67
OF QANUN-I-SHAHADAT ORDER 1984
TRUE COPY
27.3.24
EXAMINER COPY BRANCH
LAHORE HIGH COURT
MULTAN BENCH MULTAN

*Image has been digitally adjusted for legibility purposes

- 14 The Magistrate Mianchannu handed over the custody of 16-year-old **Minahil Nadeem** to a stranger lady, who converted her, rather than her parents. The lady was a close relative of her abductor.

IN THE COURT OF MUHAMMAD SOHAIL ANJUM
JUDL. MAGISTRATE SEC-30, MIANCHANNU
APPLICATION FOR RELEASING THE PETITIONER FROM
DAR-UL-AMAN/SHELTER HOME

23.06.2026

Present: Petitioner Mehnaz Bibi in person produced by Zakia 1231/LC.
Mehboob Ali TSI in person.
Shazia Mai in person.
It is fresh petition. Be registered.

Petitioner has been produced from the Dar ul Aman and is present before the court & wants to get her statement recorded. Meanwhile, statement of Mehnaz Bibi has been recorded on a separate sheet wherein she categorically statement that her family met her and informed her that her sister is not coming to take her nor she will risk her life for her. She further stated that one Mst. Shazia Mai w/o Muhammad Imran Shah, r/o Chahwan, Dak Khana Khas, Pir Abdur Rehman, Northern Tehsil Ahmad Pur Sial, Dist. Jhang converted her to Islam and she feels safe with her and therefore, wants to be released from Shelter Home with her. She further requested sought police protection till handing her over.

In view of above referred statement of the petitioner, instant application is **allowed** and petitioner is hereby ordered to be released from Shelter Home Khanewal along with Mst. Shazia Mai w/o Muhammad Imran Shah, r/o Chahwan, Dak Khana Khas, Pir Abdur Rehman, Northern Tehsil Ahmad Pur Sial, Dist. Jhang under strict police protection. The Superintendent/Incharge of Shelter Home is directed to fulfill all the lawful proceedings before releasing the petitioner. SIO concerned is also directed to provide strict protection till handing over the petitioner to the Incharge Shelter Home Khanewal. File be consigned to record room after its due completion.

Announced:
23.06.2026

Muhammad Sohail Anjum
Judl. Magistrate Sec-30
Mianchannu

Attested to be True Copy
BABAR ALI
A.C.C.
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APPENDIX D

Expert Insights

Lazar Allah Rakha

Child marriage and forced conversion of underage minority girls is a matter of profound concern for stakeholders across the globe. Minor girls, lacking maturity, are unable to grasp the long-term consequences of changing religion. The officials, however, are reported to pressure them to claim conversion in their statements before the magistrate, warning that otherwise they may be accused of apostasy.

Whenever a girl records her statement before a magistrate under Section 164 of the Code of Criminal Procedure, her abductor is present in court, often standing behind her. Abductors threaten minor girls with severe consequences if they speak against them, including making videos of sexual violence public, and threatening to kill the girls or their family members. They also present fabricated documents before the court to secure impunity for their crimes.



These factors compel girls to testify against their parents, affirming “voluntary” conversion and marriage, even when they are victims of abduction and abuse. In such circumstances, any statement given by a minor girl is clearly tainted by coercion.

The Punjab Child Marriage Restraint Act 2026 explicitly classifies child marriage and any cohabitation flowing from it, with or without “consent”, as child abuse and a punishable offence. It requires that, if a girl’s age is proven to be less than 18 years at the time of marriage, the court shall not, under any circumstances, send a minor girl with her abductor or purported husband based on mere statement or purported consent; she must either be placed in state custody or returned to her lawful guardian.

State authorities frequently disregard existing laws dealing with child marriage, sexual violence, and protection of children and women. State laws and Sharia are applied side-by-side, but courts commonly take refuge in Sharia when it suits them, arguing that if a girl has attained puberty, she has the right to marry according to Islamic law, while overlooking clear statutory protections. In most cases involving child marriage and forced conversion of minority girls, state laws and official birth-related documents receive little or no weight at the magisterial, lower, high, and superior court levels.

Legally, the consent or statement of a minor has no evidentiary value. Yet courts often fail to act neutrally and do not assess whether the girl’s statement is free of pressure or intimidation. Orders continue to be issued placing minor girls in the custody of their abductors rather than their parents, based solely on such coerced statements, which amounts to a serious violation of the law.

Police are often reluctant to register a First Information Report (FIR) against abductors. When they do, they frequently record the girl’s age as above 16 or “about 18”, and usually apply only Section 365-B of the Pakistan Penal Code (PPC), which deals with abducting a woman to compel her into marriage or illicit intercourse. They routinely avoid invoking other relevant sections such as 361, 363, 364-A, and 498-B PPC, which specifically address taking children from parental custody, abduction of minors, and forced marriage of minority girls. Under such provisions, the statement or consent of a minor carries little or no legal evidentiary value, because the law recognizes that a child cannot validly consent to abduction or marriage. Police often avoid using these sections precisely because they reduce the weight that can be attached to the minor’s statement, making it harder to use her words later to exonerate the accused. This selective use of provisions narrows the legal frame of the case and benefits the abductors. Manipulation of age in FIRs significantly weakens the case of the girl’s family. The FIR is the foundational step in criminal litigation; it frames the alleged offence, identifies applicable sections, and shapes subsequent investigation. When the girl’s age is misreported, and key child-protection sections are omitted, it becomes easier for police to conduct a superficial, biased investigation and far more difficult for families to secure justice.

The statement recorded under Section 164 of the Code of Criminal Procedure plays a decisive role in cases registered under Section 365-B of PPC. This provision allows a magistrate to record a formal statement or confession that can later be used as evidence in court, provided it is considered voluntary.

Once the girl is presented before the area magistrate and records a statement that nobody has kidnapped her and that she has accepted Islam of her own free will, the police are given a justification to quash the FIR and close the case. In practice, this single statement often becomes the sole basis for cancelling the proceedings, despite the girl's minor status and the surrounding coercive environment. The combination of age inflation, selective use of PPC sections, and reliance on Section 164 statements creates a legal pathway that systematically favours abductors over minor girls and their parents.

Investigations in these cases are often unfair and one-sided, with outcomes that favour abductors, who typically come from a Muslim background. Once the police receive a certificate claiming the girl's conversion to Islam, their attitude toward the girl's parents changes, and their willingness to assist drops significantly.

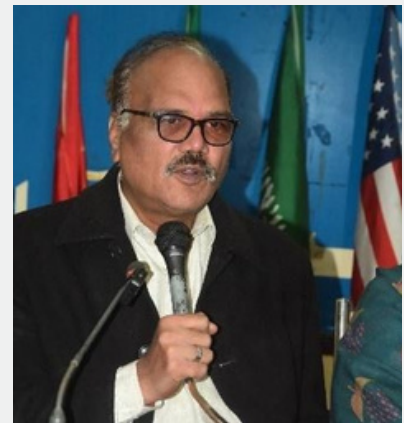
Investigators may influence the girl's statement before the court, implying that embracing Islam is inherently superior to remaining in a Christian family. Police frequently show reluctance to arrest perpetrators, and instead try to dissuade parents from pursuing the case by displaying conversion and marriage certificates of their daughters. In some instances, police submit reports that lead to the quashing of the FIR. If parents persist in seeking justice, police sometimes register FIRs against them, framing the situation as a "public order" issue to force them to abandon the case.

Within police stations, parents experience discriminatory, hostile, and inhuman behaviour. Faced with persistent mistreatment and little prospect of justice, many parents ultimately give up their legal battles. This erosion of hope further entrenches impunity for perpetrators and leaves minor girls without effective protection from the state.

Lala Robin Daniel

Under Pakistani domestic law, marriage to any girl under 18 years of age constitutes a crime, at least in principle. Yet, because existing laws are poorly implemented, the sexual abuse of underage minority girls remains widespread, routinely concealed under the guise of marriage and conversion.

Although compelling a person to abandon their faith and adopt another religion is a grave human rights violation, there is no specific law in Pakistan that criminalizes forced religious conversion. This legal vacuum allows perpetrators to operate with almost complete impunity.



In practice, perpetrators abduct underage girls from minority communities and often coerce them through threats and violence to change their religion and enter into marriage. The formal registration of these marriages serves to provide superficial legal cover to what is essentially abuse, enabling offenders to evade accountability. This impunity has made underage minority girls extremely vulnerable. They are left unsafe in their own society, knowing that those who exploit them face little or no consequence.

The conversion of underage minority girls to Islam is often celebrated socially, particularly within religious circles. Authorities in key institutions, including the police, the judiciary, and shelter homes, frequently encourage these girls to practice Islam, in some cases with the express belief that they will gain divine favour in the afterlife. Girls are also told that leaving Islam for any other faith is considered apostasy, reinforcing a one-way path into Islam with no socially or legally acceptable exit.

The most important decisions of a person's life, such as marriage and religious conversion, are sometimes made within a few hours in these cases. This is deeply disturbing, because religion is a complex philosophy; it normally takes years of learning and reflection for someone to understand and genuinely embrace its beliefs. Yet, it is now common for children to be compelled to make formal declarations of conversion without any prior exposure to the new religion, its teachings, or its language.

Judges sometimes behave less like impartial adjudicators and more like members of a village council, making arbitrary decisions grounded in their own religious convictions rather than in law and evidence. In some cases, judges determine the fate of minority girls by ordering them to stand before the court so they can be assessed by physical appearance alone. On that basis, they may declare a girl "fit for marriage", disregarding official documents, such as birth certificates, that clearly show she is underage. The courts continue to validate child

marriages, even when marriage forms (nikah nama) contain altered ages, missing identity numbers, or are associated with unregistered unions, all of which are illegal under domestic law. One judge, for example, justified validating the child marriage of Farah Shaheen on the reasoning that our ancestors did not have properly registered marriage contracts.

The social acceptance of converting minor children appears to be increasing, and is gradually becoming normalized in Pakistan. Minority families now fear for even their toddler daughters, held in their laps, because there is no defined minimum age for conversion to Islam. The lack of any age threshold means that, in practice, even very young children can be declared converts, further eroding the security of minority communities.

In the Pakistani context, a marriage between two persons from different religions and different socio-economic backgrounds is structurally fragile and often destined to fail. Many minority girls taken away under the cover of conversion and marriage simply disappear from public view. They continue to live unwanted lives where the Muslim families do not truly accept them as daughters-in-law. Some are denied basic maternal rights; there have been cases where convert women are not allowed to breastfeed their own children, further cementing their marginalization within the household.

A smaller number of girls manage to run away from their abductors or purported husbands after months or years of violence and discrimination within Muslim families. Even then, most do not return to their original families, often because of fear, stigma, or ongoing threats. They mostly live separately with their children, in conditions of acute financial hardship. In some instances, the lack of support and economic opportunity pushes them into sex work, recreating a cycle of exploitation similar to what they experienced following their coerced conversion and marriage.

Hanif Hameed Mattu

In many cases, abducted Christian girls who are forced to convert are coached about Islam by the accused's relatives and, at times, by police officers and officials of the Dar-ul-Aman (government shelter homes), to give statements in court that favour their abductors. The girls are encouraged to pray regularly and to study Islamic religious texts, often with the personal aspiration of earning heaven. Such proselytizing goes beyond the lawful mandate of government officials.

The government should impose a complete ban on religious conversion and marriage for all persons under 18 years of age. Such a ban would reflect the basic principle that children lack the maturity and legal capacity required to make decisions of this gravity, particularly entering into marriage or changing their faith. Recognizing child marriage and child faith conversions as legally null and void is essential to protect children's rights, to align with international child protection standards, and to deter perpetrators from using religion as a tool to legitimize exploitation.

Courts must rely on official documentation such as birth certificates issued by the Union Council and Child Registration Certificates issued by NADRA to verify a girl's age. The ossification test for age determination should be ordered only when no documentary evidence is available, not used to override clear official records.

To reduce the element of coercion, girls' statements under Section 164 of the Code of Criminal Procedure should be recorded in the presence of the girl's parents or legal guardians, ensuring that she is not isolated with those who may be influencing or intimidating her.

Dar-ul-Aman should adopt a clear policy allowing parents to meet their daughters during their stay, and female religious leaders from the Christian community should be designated to provide counselling specifically for Christian girls.



Akmal Bhatti

Complaints of forced conversions of underage minority girls are widespread in Pakistan, largely because perpetrators escape accountability by relying on their religious affiliation and manipulating documents presented before the courts. The introduction of safeguards is required to close a major loophole that currently allows abusers to hide exploitation behind claims of voluntary conversion and marriage by children.

Investigations and trials in such cases are often neither fair nor lawful. Both the judiciary and the police tend to favour abductors, relying on forged certificates and statements made by minor girls under duress. The court's reasoning includes claims that birth certificates can easily be tampered with, that newly converted girls cannot be allowed to return to non-Muslim parents, and that girls appear to be adults based on physical appearance, even when documentary proof indicates they are underage. A striking example is the Federal Constitutional Court's refusal to accept strong, credible birth certificate evidence showing that both Maria Shahbaz and Sonia Tariq are minors, and its failure to order their custody to be returned to their parents.

It is the core responsibility of legal duty-bearers to ensure that marginalized groups, especially religious minorities, enjoy equal access to justice. To meet this obligation, the government should enact a dedicated law to prevent the forced conversion of minor girls from religious minority communities, introducing a specific offense into the Pakistan Penal Code that explicitly recognizes forced conversion of minors as a crime. Such a law should include a clear provision stating that persons under 18 years of age do not have the legal capacity to decide to change their faith on their own, and that any change of religion by a minor requires the consent of their parents or legal guardians.



Ghazala Shafique

Socioeconomic conditions and religio-political dynamics strongly shape the pattern of forced conversion and child marriage of minority girls in Pakistan. In practice, older men from nearby localities monitor households where young girls live, watching for times when parents leave home for work, and the girls are alone. When they find such an opportunity, these sexual predators reportedly break into houses and forcibly take the girls to religious institutions, followed by marriage registrars who rapidly issue certificates of conversion and marriage, giving a veneer of legality for what is fundamentally a criminal act.

In many cases, judges issue verdicts based on personal mindsets or religious convictions rather than on the law and evidence. For example, a judge in Quetta justified validating a child marriage by arguing that Hazrat Maryam (Mother Mary) married at the age of 13, treating this as a precedent. Such reasoning may have meaning in a religious narrative, but it directly contradicts the existing legal framework, which prohibits child marriage and is meant to protect children from abuse.

Both the general public and, more specifically, police and judges often support the abductor or purported husband once they learn that a minor girl has “converted” to Islam. These cases are frequently framed as “love jihad” or romantic elopement rather than as abduction, sexual violence, or forced conversion.

This environment makes it nearly impossible for girls to renounce Islam and return to their parents; in most cases, they remain separated from their families for life due to social pressure, fear, and institutional bias.

There is a need to clearly assert that marriage of Christian girls under Mohammadan (Muslim) law is unacceptable. Each religious community in Pakistan has its own legal framework to regulate marriage, and Muslim family law should not be allowed to override or supersede the marriage laws of religious minorities. Respecting distinct personal laws is essential both for protecting minority rights and for preventing the misuse of conversion and marriage as tools of coercion.

The government should organize comprehensive training programs for police officers, magistrates, and Nikah Khwans (Marriage Registrars) so they better understand laws relating to marriage, sexual violence, and the



protection of children and women, and can act in line with domestic legal standards.

The government should promote public service messages via telephone, print, electronic, digital, and social media, clearly informing people from all backgrounds that marriage of any boy or girl below 18 years of age is illegal and that anyone facilitating such a marriage will face specific legal punishments.

Bishop Ibrahim Daniel

Every person has the right to change religion freely, guided by their own conscience and conviction. For adults, the doors of any religion should remain open, without undue restriction, and such a change should be respected as an exercise of personal liberty. However, when a minor girl, with no understanding of the new faith, is forcibly converted and then married off on the same day to satisfy someone's sexual desires, the situation becomes a grave violation of human dignity and rights.

Forced conversion of underage minority girls is not an isolated phenomenon; it is a growing reality that is gradually becoming normalized in Pakistan. As a result, minority families increasingly perceive the environment as unsafe for their daughters, living in constant fear of abduction, coercion, and abuse.

This climate of insecurity has pushed many Hindu and Christian families either to migrate to other countries or to relocate within Pakistan, often to unfamiliar areas. Young Christian girls in particular are left with fewer opportunities for education and decent livelihoods when their families are forced to move or live in hiding.

There is also an emerging pattern in which parties from Christian or Hindu communities choose to convert to Islam specifically to contract a marriage through court under Mohammadan (Muslim) law. In these situations, faith conversion is used as a tool to benefit from a particular marriage framework, rather than as a genuine expression of religious belief. This instrumental use of conversion for the sole purpose of marriage needs to be addressed, both to prevent the misuse of religious identity and to ensure that any change of faith reflects authentic conviction rather than circumstantial or legal pressure.



Ruth Rukhsana

The status, whereabouts, safety, and living conditions of underage minority girls often remain unknown, particularly in cases where they are taken away under the guise of faith conversion. Once removed from their families and communities, these girls become even more vulnerable in captivity and may be subjected to sex trafficking, sexual exploitation, and conditions resembling slavery. This disappearance under the packaging of conversion makes monitoring, protection, and accountability extremely difficult, and allows prolonged abuse to continue out of public view.

A bill aimed at criminalizing forced conversion of minority girls was at one point under serious consideration by the government, but it was ultimately rejected. This rejection came under pressure from powerful religious and political actors, including bodies such as the Council of Islamic Ideology and the Ministry of Religious Affairs, who claimed that forced conversions of minorities do not occur in Pakistan. There is still no specific law to address the offence of forced conversions in Pakistan; it has become easier for perpetrators to carry out child marriage and sexual violence with impunity, using religious conversion as a shield against prosecution.

In recent years, the slogan "Stop Forced Conversion in Pakistan" has gained prominence, and the cries of abducted minority girls and their parents have begun to resonate internationally. Serious, coordinated efforts are needed from all concerned stakeholders to locate and bring back abducted girls, end their suffering, and ensure the enactment and implementation of a law that criminalizes forced conversions and holds perpetrators accountable.



APPENDIX E

Relevant Legislations

Pakistan Penal Code

292A. Exposure to seduction:

Whoever seduces a child by any means whatsoever with an intent to involve him in any sexual activity or exposes him to obscene and sexually explicit material, document, a film, video or a computer-generated image or attempts to do the aforementioned act, shall be punished with imprisonment of either description for a term which shall not be less than one year and may extend up to seven years or with fine which shall not be less than one hundred thousand rupees and may extend up to five hundred thousand rupees, or with both.

292B. Child pornography:

(1) Whoever takes, permits to be taken, with or without the consent of the child or with or without the consent of his parents or guardian, any photograph, film, video, picture or representation, portrait, or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of obscene or sexually explicit conduct, where,

(a) the production of such visual depiction involves the use of a minor boy or girl engaging in obscene or sexually explicit conduct;

(b) such visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaging in obscene or sexually explicit conduct; or

(c) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in obscene or sexually explicit conduct;

is said to have committed an offence of child pornography.

(2) The preparation, possession or distribution of any data store on a computer disk or any other modern gadget, shall also be an offence under this section.

292C. Punishment for child pornography:

Whoever commits an offence of child pornography shall be punished with imprisonment of either description for a term which shall not be less than fourteen years and may extend up to twenty years and with a fine which shall not be less than one million rupees, or with both.

361. Kidnapping from lawful guardianship:

Whoever takes or entices any minor under fourteen years of age if a male, or under sixteen years of age if a female, or any person of unsound mind, out of the keeping of the lawful guardian of such minor or person of unsound mind, without the consent of such guardian, said to kidnap such minor or person from lawful guardianship.

Explanation: The words "lawful guardian" in this section include any person lawfully entrusted with the care or custody of such minor or other person.

Exception: This section does not extend to the act of any person who in good faith believes himself to be the father of an illegitimate child or who in good faith believes himself to be entitled to the lawful custody of such child, unless such act is committed for an immoral or unlawful purpose.

362. Abduction:

Whoever by force compels, or by any deceitful means induces, any person to go from any place, is said to abduct that person.

363. Punishment for kidnapping:

Whoever kidnaps any person from Pakistan or from lawful guardianship, shall be punished with imprisonment of either description for a term which may extend to seven years, and shall also be liable to fine.

364. Kidnapping or abducting in order to murder:

Whoever kidnaps or abducts any person in order that such person may be murdered or may be so disposed of as to be put in danger of being murdered, shall be punished with imprisonment for life or rigorous imprisonment for a term which may extend to ten years and shall also be liable to fine.

364A. Kidnapping or abducting a person under the age of fourteen:

Whoever kidnaps or abducts any person under the age of fourteen in order that such person may be murdered or subjected to grievous hurt, or slavery, or to the lust of any person or may be so disposed of as to be put in danger of being murdered or subjected to grievous hurt, or slavery, or to the lust of any person shall be punished with death or with imprisonment for life or with rigorous imprisonment for a term which may extend to fourteen years and shall not be less than seven years.

365. Kidnapping or abducting with intent secretly and wrongfully to confine person:

Whoever kidnaps or abducts any person with intent to cause that person to be secretly and wrongfully confined, shall be punished with imprisonment of either description for a term which may extend to seven years, and shall also be liable to fine.

365B. Kidnapping, abducting or inducing woman to compel for marriage etc.:

Whoever kidnaps or abducts any woman with intent that she may be compelled, or knowing it to be likely that she will be compelled, to marry any person against her will, or in order that she may be forced, or seduced to illicit intercourse, or knowing it to be likely that she will be forced or seduced to illicit intercourse, shall be punished with imprisonment for life, and shall also be liable to fine; and whoever by means of criminal intimidation as defined in this Code, or of abuse of authority or any other method of compulsion, induces any woman to go from any place with intent that she may be, or knowing that it is likely that she will be, forced or seduced to illicit intercourse with another person shall also be punishable as aforesaid.

366A. Procurement of minor girl:

Whoever by any means whatsoever induces any minor girl under the age of eighteen years to go from any place or to do any act with intent that such girl may be, or knowing that it is likely that she will be, forced or seduced to illicit intercourse with another person shall be punishable with imprisonment which may extend to ten years and shall also be liable to fine.

375. Rape:

A person A is said to commit "rape" if A-

(a) penetrates his penis, to any extent, into the vagina, mouth, urethra or anus of another person B or makes B to do so with A or any other person; or

(b) inserts, to any extent, any object or a part of the body, not being the penis, into the vagina, the urethra or anus of B or makes B to do so with A or any other person; or

(c) manipulates any part of the body of B so as to cause penetration into the vagina, urethra, anus or any part of body of B or makes B to do so with A or any other person; or

(d) applies his mouth to the vagina, anus, urethra or penis of B or makes B to do so with A or any other person, under the circumstances falling under any of the following seven descriptions,- firstly, against B's will; secondly, without B's consent; thirdly, with B's consent, which has been obtained by putting B or any person in whom B is interested, in fear of death or of hurt; fourthly, with B's consent, when A knows that A is not B's husband and that B's consent is given because B believes that A is another man to whom B is or believes herself to be lawfully married; fifthly, with B's consent when, at the time of giving such consent, by reason of unsoundness of mind or intoxication or the administration by A personally or through another of any stupefying or unwholesome substance, B is unable to understand the nature and consequences of that to which B gives consent; sixthly, with or without B's consent,

when B is under sixteen years of age; or seventhly, when B is unable to communicate consent.

Explanation 1.- For the purposes of this section, "vagina" shall also include labia majora.

Explanation 2.- Consent means an unequivocal voluntary agreement when B by words, gestures or any form of verbal or non-verbal communication, communicates willingness to participate in the specific sexual act:

Provided that if B who does not physically resists to the act of penetration, it shall not by the reason only of that fact be regarded as consenting to the sexual activity.

Explanation 3.- In this Chapter,-
"person" means male, female or transgender; and
"rape" includes "gang rape".

Explanation 4.- A bona fide medical procedure or intervention shall not constitute rape.

375A. Gang rape:

Where a person is raped by one or more persons constituting a group or acting in furtherance of a common intention, each of those persons shall be guilty of the offence of gang rape and shall be punished with death or for imprisonment for the remainder period of natural life or imprisonment for life and fine.

376. Punishment for rape:

(1) Whoever commits rape shall be punished with death or imprisonment of either description for a term which shall not be less than ten years or more than twenty-five years or for imprisonment for the remainder period of his natural life and shall also be liable to fine.

(1A) Whoever commits an offence punishable under sub-section (1) or sub-section (2) of section 377 or section 377B and in the course of such commission causes any hurt punishable as an offence under section 333, section 335, clauses (iv), (v) and (vi) of sub-section (3) of section 337, section 337C, clauses (v) and (vi) of section 337F shall be punished with death or imprisonment for life and fine.

(3) Whoever commits rape of a minor or a person with mental or physical disability shall be punished with death or imprisonment for life and fine.

(4) Whoever being a public servant including a police officer, medical officer or jailor, taking advantage of his official position, commits rape shall be punished with death or imprisonment for life and fine.

377. Unnatural offences:

Whoever voluntarily has carnal intercourse against the order of nature with any man, woman or animal, shall be punished with imprisonment for life, or with imprisonment of either description for a term which shall not be less than two years nor more than ten years, and shall also be liable to fine.

377A. Sexual abuse:

Whoever employs, uses, forces, persuades, induces, entices, or coerces any person to engage in, or assist any other person to engage in fondling, stroking, caressing, exhibitionism, voyeurism or any obscene or sexually explicit conduct or simulation of such conduct either independently or in conjunction with other acts, with or without consent where age of person is less than eighteen years, is said to commit the offence of sexual abuse.

377B. Punishment:

Whoever commits the offence of sexual abuse shall be punished with imprisonment of either description for a term which shall not be less than fourteen years and may extend up to twenty years and with a fine which shall not be less than one million rupees.

498B. Prohibition of forced marriage:

Whoever coerces or in any manner whatsoever compels a woman to enter into marriage shall be punished with imprisonment of either description for a term, which may extend to seven years or for a term which shall not be less than three years and shall also be liable to fine of five hundred thousand rupees.

Provided that in case of a female child as defined in the Child Marriage Restraint Act, 1929 (XIX of 1929), or a non-Muslim woman, the accused shall be punished with imprisonment of either description for a term which may extend to ten years but shall not be less than five years and shall also be liable to a fine which may extend to one million rupees.

The Punjab Child Marriage Restraint Act 2026

First published, after having received the assent of the Governor of the Punjab, in the Gazette of the Punjab (Extraordinary) dated May 11, 2026.

An Act to restrain the solemnization of child marriages in the Punjab.

It is necessary to restrain the solemnization of child marriages in the Punjab and to provide for the matters connected therewith and ancillary thereto.

It is hereby enacted by Provincial Assembly of the Punjab as follows:

1. Short title, extent and commencement

- (1) This Act may be cited as the Punjab Child Marriage Restraint Act 2026.
- (2) It extends to the whole of the Punjab.
- (3) It shall come into force at once.

2. Definitions

In this Act—

- (a) “Act” means the Punjab Child Marriage Restraint Act 2026;
- (b) “best interests of the child” means the child’s well-being and holistic development, including safety, health, education, dignity, identity and protection from abuse, exploitation and harmful practices, to be assessed in the light of the child’s age and evolving capacities;
- (c) “child” means a person, male or female, who is under eighteen years of age;
- (d) “child marriage” means an act of Nikah or solemnizing a marriage where both or either of the contracting parties is a child;
- (e) “Code” means the Code of Criminal Procedure, 1898 (V of 1898);
- (f) “contracting party” means either of the parties whose Nikah or marriage is, or about to be, performed or solemnized;
- (g) “Court” means the Court of Sessions as provided under the Code;
- (h) “Government” means Government of the Punjab; and
- (i) “guardian” means a natural guardian or a guardian appointed under the Guardians and Wards Act, 1890 (VIII of 1890).

3. Registration of child marriages

- (1) No Nikah registrar shall register a child marriage.
- (2) Whoever contravenes the provision of sub-section (1) shall be liable to be punished with simple imprisonment for a term which may extend to one year and with fine of one hundred thousand rupees.

4. Punishment for marrying a child

Whoever, being an adult above eighteen years of age, contracts a marriage with a child, shall be punished with rigorous imprisonment which may extend to three years but shall not be less than two years and shall be liable to fine which may extend to five hundred thousand rupees.

5. Child abuse and its punishment

- (1) Any form of cohabitation, before attaining the age of eighteen years, with or without consent, resulting from a child marriage shall be the child abuse under the Act.
- (2) Any person who induces, forces, persuades, entices or coerces any child bride or child groom to engage in child abuse or commits child abuse shall be punished with imprisonment for a term which may extend to seven years but shall not be less than five years and with fine which shall not be less than one million rupees.

6. Child trafficking and its punishment

(1) Any person who induces, forces, persuades, entices, compels or coerces any child to leave, or takes such child beyond the territorial boundary of the Punjab for the purpose of defeating and evading the provisions of the Act for child marriage, shall commit the offence of child trafficking, and shall be punished with imprisonment which may extend to seven years but shall not be less than five years and with fine which may extend to one million rupees.

(2) Any person who recruits, harbours, transports, provides or obtains any child for the purpose of child trafficking shall commit an offence under the Act which shall be punished with imprisonment which may extend to three years and with fine which may extend to five hundred thousand rupees.

7. Punishment for guardian involved in a child marriage

Where a guardian or any other person in any capacity, lawful or unlawful, does any act to promote a child marriage, child abuse or permits a child marriage to be solemnized, or intentionally or negligently fails to prevent it from being solemnized, shall be punished with rigorous imprisonment which may extend to three years but shall not be less than two years, and shall also be liable to fine which may extend to five hundred thousand rupees.

8. Jurisdiction under the Act

Notwithstanding anything contained in section 190 of the Code, no court other than the Court of Sessions shall take cognizance of or try any offence under the Act.

9. Power to issue injunction

(1) Notwithstanding anything to the contrary contained in any other law, the Court may, if satisfied with the information laid before it through an application that a child marriage is going to be arranged, issue an injunction:

Provided that where the person who has laid the information before the Court requests to keep his identity hidden from the contracting parties or from the parent or guardian of the contracting parties or other parent, the Court shall adopt appropriate measures to protect the identity of such person.

(2) No injunction under sub-section (1) shall be issued against any person unless the Court has previously given notice to such person, and has afforded him an opportunity to show cause against the issuance of the injunction:

Provided that the Court may dispense with such notice if it deems necessary.

(3) The Court may, either on its own motion or on an application of any person, rescind or alter any order made under sub-section (1).

(4) Where an application under sub-section (3) is received, the Court shall afford an opportunity for the applicant to appear before it either in person or by a pleader, and if the Court rejects the application wholly or in part, it shall record in writing the reasons thereof.

(5) Whoever, knowing that an injunction has been issued against him under sub-section (1), disobeys such injunction, shall be punished with imprisonment for a term which may extend to one year or fine which may extend to one hundred thousand rupees or with both.

10. Offences to be non-bailable

Notwithstanding anything contained in the Code, an offence punishable under the Act shall be cognizable, non-bailable and non-compoundable.

11. Trial of offences

The Court shall, on taking cognizance of a case under the Act, proceed with the trial and conclude it within ninety days.

12. Applicability of the Code

Subject to the provisions of the Act, the provisions of the Code shall mutatis mutandis apply.

13. Best interests of the child

(1) In all actions and decisions taken under this Act, including prevention, investigation, prosecution, bail, sentencing and protective injunctions, the best interests of the child shall be a primary consideration.

(2) For the purposes of sub-section (1), the Court shall consider:

- (a) the child's safety and protection from violence, intimidation, retaliation and social stigma;
- (b) the child's physical and mental health, including risks arising from cohabitation or pregnancy;
- (c) the child's right to education and development, and future opportunities;
- (d) the child's views, having regard to age and evolving capacities;
- (e) immediate protective needs, including safe shelter and supervised custody where required; and
- (f) any other factor necessary to secure the child's dignity, autonomy and welfare.

(3) No child shall be treated as an offender merely by reason of being a contracting party to a child marriage.

(4) In any proceedings under this Act where a contracting party who is a child has been taken, enticed, induced, coerced, trafficked or otherwise removed from lawful guardianship for the purpose of marriage, the Court shall not treat the mere statement or purported consent of such child to reside with or accompany the adult contracting party as determinative of custody, residence or protective orders.

(5) In cases under this Act, the Court shall conduct an independent and reasoned assessment of the child's safety, welfare and best interests, having regard to:

- (a) the circumstances in which the child was removed or taken;
- (b) any element of coercion, undue influence, intimidation, deception, grooming or abuse;
- (c) the age, vulnerability and evolving capacity of the child;
- (d) the likelihood of continued harm, exploitation or retaliation; and
- (e) the necessity of protective custody, safe shelter, counselling or supervised arrangements.

(6) No finding of voluntary consent by a child shall, by itself, defeat the protective jurisdiction of the Court under this Act.

(7) The Court shall prioritize the physical safety, mental well-being, dignity, education and long-term development of the child over any claim based on marital status, customary practice or alleged consent.

(8) The Government may, by rules, prescribe child-friendly procedures for recording statements and providing protection and support services to a child in proceedings under this Act.

14. Power to make rules

The Government may, by notification in the official Gazette, make rules for carrying out the purposes of the Act.

15. Repeal and saving

(1) The Child Marriage Restraint Act, 1929 (XIX of 1929) and the Punjab Child Marriage Restraint Ordinance 2026 (I of 2026) are hereby repealed.

(2) All orders made and decisions taken under the repealed Act and repealed Ordinance shall be deemed to have been validly made and taken under the Act.

Ch Amer Habib
Secretary General

