

Free to Convert, Practice, and Profess

*A Review of Anti-Conversion Laws in Algeria, India,
and Nepal*



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JUBILEE
CAMPAIGN





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INTRODUCTION

For many years, the inhumanity of apostasy and anti-conversion laws and their corresponding harsh punishments has been a major point of concern highlighted at the United Nations. In 2012, the Special Rapporteur on freedom of religion or belief flagged the nefarious effects of apostasy laws and made recommendations on how to abolish and prevent them. In March 2019, the Rapporteur again highlighted these laws and how they were fundamentally discriminatory in nature.

These reports have been coupled by action by the Office of the United Nations High Commissioner for Human Rights (OHCHR) in 2011 with the various opportunity expert workshops that resulted in the Rabat Plan for Action. This was followed by the Beirut Declaration and Faith for Rights framework in 2017 which echoes the Special Rapporteur's report calling for the repeal of anti-apostasy laws as they have "a stifling impact on the enjoyment of freedom of thought, conscience, religion or belief."

Despite widespread consensus on the need to immediately and unconditionally abolish legislations restricting freedom of religion or belief, such as apostasy laws, anti-conversion laws, and also blasphemy laws, at least 70 nations across the world criminalize blasphemy, 22 of which similarly criminalize apostasy. This number, however, does not include the additional countries that do not legally outlaw religious conversion but instead violate the individuals' right to convert by punishing acts of peaceful evangelism and proselytism.

In this report, we will be discussing legislations and policies targeting religious conversion and faith minorities in three countries of interest which Jubilee Campaign has been working on extensively over the past few years: Algeria, India, and Nepal. We have consistently been advocating for Algerian prisoners of conscience targeted by discriminatory proselytism laws, monitoring trends of violence against those accused of conversion in India, and raising the case of a pastor in Nepal.





ALGERIA

At the outset, the Algerian Constitution identifies Islam as the official national religion and prohibits institutions and individuals from “infringing [upon] the Islamic morals”, however, in Article 51 guarantees the right of Algerian citizens to freedom of opinion and freedom of worship.⁽¹⁾ It is important to note that as recently as 2020, the constitutional referendum removed the phrase “freedom of conscience” from the document. As such, it is no surprise that issues of the manifestation of faith are addressed additional legislations and policies.

Article 144 of the Algerian Penal Code criminalizes “offending the prophet and messengers of God or disparaging the dogma or precepts of Islam” and stipulates punishment ranging from three to five years’ imprisonment and a hefty fine.⁽²⁾ Blasphemy laws such as this one are in many instances used to arbitrarily arrest faith minorities on often false accusations. In January 2021, Algerian authorities arrested Christian man Hamid Soudad for a

cartoon of the Prophet Muhammad that he had shared to his personal Facebook account three years prior in 2018. Having been provided no access to legal representation or a fair trial, Soudad was sentenced the following day to five years’ imprisonment on the charges of “insulting the Prophet of Islam”. Numerous details of Soudad’s case and swift sentencing are worthy of scrutiny. For example, the case does not meet the law’s requirement of directness between speech and the alleged harm incurred; a whole three years had passed between when Soudad had posted the allegedly offensive cartoon on his Facebook profile and when he was arrested, calling into question what harm could have been so recently inflicted by such an old post. Furthermore, the sentence imposed upon Soudad both deviates from judicial precedence and is disproportionate to the alleged crime. In similar past cases, Algerian authorities have reserved the five year prison sentence only to individuals who originally created the allegedly blasphemous content. Soudad was

was not the artist of the cartoon; rather, he only shared the cartoon, and yet he still received the maximum penalty under the blasphemy law. Finally, a five-year prison sentence is much too harsh a punishment for a non-violent crime; for comparison, an Algerian citizen can be sentenced to five years' imprisonment for crimes such as selling, distributing, or storing bladed weapons for illicit purposes.(3)

Another individual targeted by Algeria's blasphemy laws is Christian political prisoner of conscience Suleiman Bouhafs. In 2016, Algerian authorities arrested Bouhafs after he had posted remarks on Facebook criticizing Islam, and he was charged with "harming the image of the Prophet" and sentenced to three years' imprisonment. In 2018, however, after receiving a presidential pardon, Bouhafs fled to neighboring Tunisia where he has resided the past few years. In an unfortunate recent turn of events, in August 2021 Bouhafs' neighbors witnessed plainclothes police abducting him and forcing him into a vehicle. Days later, Bouhafs was discovered to be in the capital of Algeria, having been illegally repatriated by Tunisian authorities. Now stuck once again in the country he had successfully escaped, Bouhafs faces new charges including blasphemy under Penal Code Article 144.(4)

With regards to legislations that target legitimate and consensual acts of religious conversion – an activity which falls under the umbrella of freedom of religion or belief – Ordinance 06-03 on the Conditions and Rules of Practice of Faiths

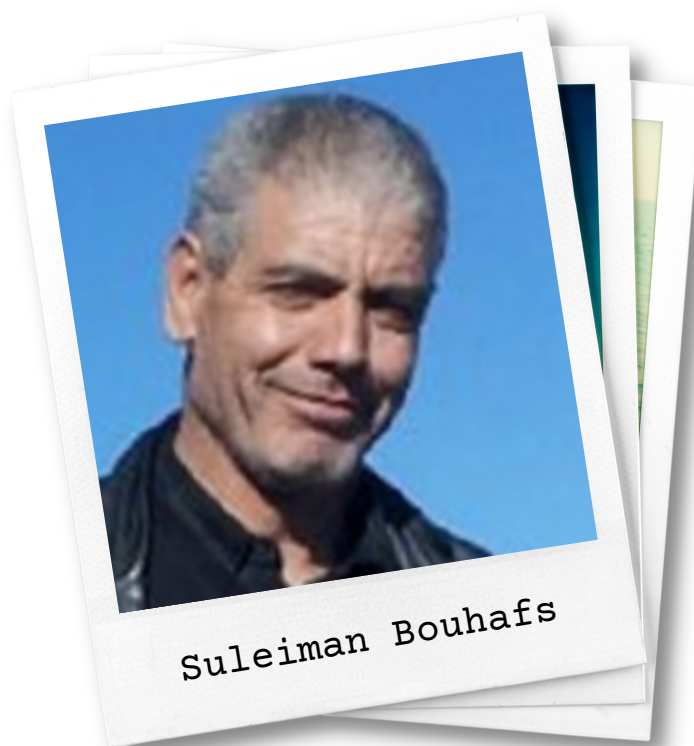
other than Islam prohibits "printing, storing or distributing materials intended to convert Muslims away from Islam", a charge which is accompanied by a prison term of up to five years and a maximum fine of one million dinars (\approx USD \$7000).(5) In June 2021 in the span of just a couple weeks, Algerian authorities arbitrarily closed Oran City's Oratoire Church and its bookstore, and arrested the church's Pastor Rachid Seighir and the bookstore clerk Nouh Hamini on charges of "distributing publications or any other propaganda undermining the faith of a Muslim". Pastor Seighir and Hamini were each sentenced to two years in prison and fines of 500,000 dinars (\approx USD \$3500). Fortunately, on appeal, the two's sentences were commuted to one year in prison each and fines of 200,000 dinars (\approx USD \$1500). In September 2021, Pastor Seighir once again sought to appeal for a complete acquittal but the regional court of appeals upheld his suspended sentence.(6) In November 2021, United Nations officials, including Special Rapporteur on freedom of religion or belief, Dr. Ahmed Shaheed, and Special Rapporteur on minority issues, Ferdinand de Varennes, sent a joint letter to the Algerian Government urging that they "take all necessary measures to ensure the protection of the rights and freedoms of Mr. Soudad" as he was unjustly targeted for the exercise of his right to freedom of religion or belief.(7) In mid-April 2021, authorities arrested Christian convert Foudhil Bahloul and three of his close friends before searching his home and seizing possessions without warrant; the items and texts that were confiscated were

confiscated were related to his Christian faith. Algerian authorities held Bahloul's first hearing on 30 June 2021 without legal counsel and charged him with distributing Bibles in order to "spread poisonous ideas to the unemployed youth" which "destabilized their faith in Islam", and sentenced Bahloul to six months' imprisonment and a fine of 100,000 dinars (\approx USD \$710). In December 2021, Bahloul's appeal was rejected.(8)

Another two individuals, though they were not charged with illegal evangelism and proselytism, were condemned as alleged "apostates" by radical Muslims for their promotion of the Orthodox Church. In Béjaïa province in December 2020, a regional court sentenced Copt convert Abdelghani Mameri to six months' imprisonment for his work advertising the church. During the trial, radical Muslims supported harsh penalties against the 'apostate', the Prosecutor of the Republic demanded a two-year prison term and 200,000 dinar fine (\approx USD \$1500) for Mameri, and even Mameri's defense lawyer encouraged his client to recant his faith. Also in December 2020, the same regional court sentenced another Coptic convert, Mabrouk, to three years in prison and a fine of 50,000 dinars (\approx USD \$350) for the same charges as Mameri; this lengthy prison term surpassed the Prosecutor of the Republic's demands of six months' imprisonment.(9)

Despite the above numerous cases of individuals being detained and imprisoned for their faith or expressions about faith,

Algerian President Abdelmadjid Tebboune refused to address questions regarding religious prisoners of conscience during a presidential address in August 2021, stating simply that "dozens of people, who were convicted by the courts for imprisonment or who are under judicial prosecution, were accused of defamation".(10)



Suleiman Bouhafis



Rachid Seighir



INDIA

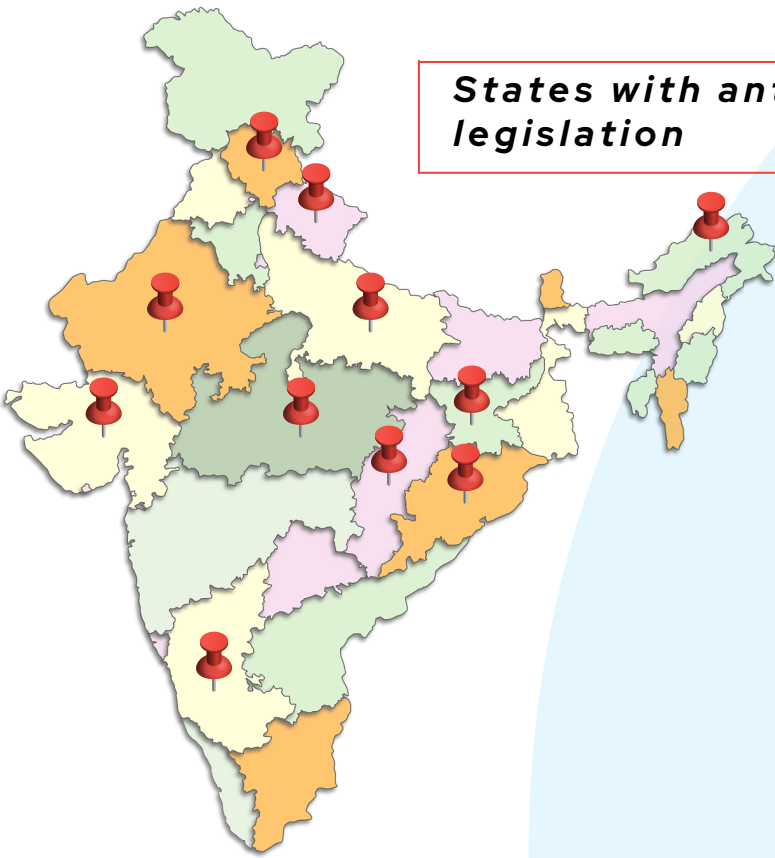
In comparison to Algeria, India's Constitution of 1949 is more comprehensive in its guarantees regarding freedom of religion or belief. Article 25 allows Indian citizens to freely profess, practice, and propagate religion, however these rights are subject to "public order, morality and health". Article 26 expands on this by providing faith communities the right to establish religious institutions, manage their own affairs, own property, and establish houses of worship.⁽¹¹⁾

Chapter XV of India's Penal Code outlines Offenses Relating to Religion and Articles 295 and 298 can be considered blasphemy laws. Article 295A criminalizes "deliberate or malicious acts intending to outrage religious feelings of any class" with three to five years' imprisonment and/or a fine. Article 298 stipulates that any individual who "with the deliberate intention of wounding the religious feelings of any person, utters any word or makes any sound in the hearing of that person or makes any gesture in the sight of that

person" shall be imprisoned for up to one year and receive a fine.⁽¹²⁾

Eleven of India's 28 states (36%) – Arunachal Pradesh, Chhattisgarh, Gujarat, Himachal Pradesh, Jharkhand, Karnataka, Madhya Pradesh, Odisha, Rajasthan, Uttar Pradesh, and Uttarakhand – have enacted legislations that counter allegedly "forced", "coercive", and "fraudulent" religious conversions. In reality, radical Hindus have used these laws to falsely accuse faith minorities – primarily Christians and Muslims – of fraudulent conversion for simple acts such as praying for individuals' health or delivering humanitarian assistance, the latter of which has been a primary focus of Indian Christian communities during the COVID-19 pandemic. In its Yearly Report 2021, the Evangelical Fellowship of India's Religious Liberty Commission counted numerous false accusations of fraudulent religious conversion, often accompanied by arbitrary arrests and violence, notably in the above listed states: Chhattisgarh [22

States with anti-conversion legislation



to Christianity, Simon was disowned by his family and went multiple days without food. In June in Punjab, three women who had recently accepted Christian faith were physically assaulted by three male perpetrators who lived in the same community. In October in Bihar, a group of Hindu extremist forcefully re-converted a recent Christian convert woman back to Hinduism; after she refused to re-convert, the perpetrators bound her limbs and shoved food into her mouth, forcing her into submission.

accusations], Gujarat [3 accusations], Himachal Pradesh [1 accusation], Jharkhand [6 accusations], Karnataka [18], Madhya Pradesh [36 accusations], Odisha [3 accusations], Uttar Pradesh [69 accusations], and Uttarakhand [8 accusations].⁽¹³⁾

Moreover in 2021, Indian Christians who had recently converted to Christianity were targeted with violence and exile by their families, neighbors, and radical Hindu extremists. In February in Chhattisgarh, a Christian convert and childcare worker, Kanni Barse, requested to be transferred to another childcare facility as she was being harassed and threatened by her coworkers for converting to Christianity. In February in Jharkhand, the family of a recently-converted Christian woman threatened to kill her and eventually expelled her and her two children to the forest. In April in Uttar Pradesh, a blind 19-year-old recent convert

Two of the most recent state anti-conversion legislations are Uttar Pradesh's Prohibition of Unlawful Religious Conversion Ordinance of November 2020 and Madhya Pradesh's misleadingly named Freedom of Religion Act of January 2021. Both of these laws have been enacted in response to the 'love jihad' conspiracy theory which has permeated Hindu nationalist circles. The 'love jihad' theory postulates that Muslim men are seducing and marrying Hindu women with the ulterior motive of converting them to Islam. As such, these policies in Uttar Pradesh and Madhya Pradesh have predominantly been used by Hindu extremists who falsely accuse Muslim men of 'love jihad' in order to prevent, dissolve, and punish legitimate interfaith marriages. Numerous concerns have been raised about Uttar Pradesh's and Madhya Pradesh's 'love jihad' laws, most notably that they are being misused

to target Muslim minority men for arbitrary arrest and imprisonment. Upon deeper consideration, they encroach upon loving interfaith marriages and violate the brides' choice of a marriage partner by incorrectly assuming that Hindu women are naïve and vulnerable to trickery by Muslim men.(14)

Interfaith couples have expressed that 'love jihad' laws have forced them to date or marry in secret. In 2021, 22-year-old Hindu woman Simran Sagar and her Muslim fiancé, 26-year-old Mohammed Shameem, were forced to flee Uttar Pradesh and live in a safe house to escape persecution for their interfaith relationship. They were fearful that one of them would be arrested under the 'love jihad' laws. Though Simran and Mohammed's parents have been supportive of the couple's relationship, they are devastated that they had to run away to live according to their will.(15)

Uttar Pradesh's and Madhya Pradesh's 'love jihad' laws have directly resulted in an increase in false accusations of fraudulent conversions. In December 2020, just one month after the implementation of Uttar Pradesh's Prohibition of Unlawful Religious Conversion Ordinance, numerous accusations were registered. On December 2, state authorities disrupted a wedding between a Hindu woman and her Muslim fiancé. Despite that the marriage appeared to be legitimate – as the bride, groom, and both families were supportive of the union – the police prevented the wedding from concluding.(16) On December 6, authorities detained a 22-year-old pregnant Hindu woman and her Muslim

husband for allegedly engaging in 'love jihad'; regrettably, the woman suffered a miscarriage while she was separated from her husband and detained in a shelter home.(17) On Christmas day, a Muslim teenage boy was arrested after the father of one of his Hindu female classmates baselessly accused him of "inducing the girl to elope with him" and convert to Islam.(18)

Other Notable Cases

In August 2021, 22-year-old Shalini's mother alleged that her daughter had been kidnapped by a Muslim man named Mohamed and was converted to Islam and married against her will. Shalini then posted a video stressing that she had married and converted upon her own free will. The only 'evidence' Shalina's mother provided of the claims was that she "felt" that Muslims were "the type" to engage in 'love jihad'. Shalina, when asked again about whether her marriage and conversion was consensual, explained, I have an MBA. Am I a baby girl that somebody will say something and I will get brainwashed?"(19)

In September 2021, 24-year-old Muslim man Arbaaz Aftab Mullah was killed for allegedly engaging in 'love jihad' after he fell in love with and began a consensual relationship with a Hindu woman. Mullah was in a relationship with a Hindu neighbor woman Shweta, and his mother warned him of the dangers of interfaith relationships. Shortly before Mullah was stabbed to death and decapitated, he had been receiving threatening phone calls. (20)



NEPAL

Nepal's Constitution expressly guarantees citizens' right to freely "profess, practice, and preserve his/her religion according to his/her faith" and faith communities' right to "manage and protect its religious places and religious trusts in accordance with law". However, dissimilar to Algeria and India which indirectly target acts of religious conversion under the guise of prohibiting "fraudulent" or "coercive" conversion activities, both Nepal's Constitution and Penal Code explicitly prohibit converting an individual's faith. Article 26(3) of the Constitution states that acts to "disturb public law and order situation, or convert a person of one religion to another religion, or disturb the religion of other people" is punishable by law.⁽²¹⁾

These punishments are delineated in Nepal's Criminal Code of 2017. Article 155 criminalizes acts of blasphemy, including insulting one's religious beliefs, with three years' imprisonment and a fine of 30,000 rupees (\approx USD \$250); foreign nationals

who are charged with blasphemy in Nepal are similarly required to complete their prison term and within one week of release must leave the country willingly or otherwise be deported. Criminal Code Article 158 states that "no one shall convert any one from one religion to another or make attempt to or abet such conversion" and that, further, "no one should convert a person from one religion to another religion or profess [their] own religion and belief with similar intention by using or not using any means of attraction". Any individual charged with proselytism and conversion, accordingly, faces five years' imprisonment and a fine of 50,000 rupees (\approx USD \$400).⁽²²⁾

Open Doors has explained that in Nepal, "revealing the Christian faith is equal to evangelism in the eyes of Hindu radicals", and Christian converts who are open about their newfound religion are susceptible to persecution on social media, confiscation of religious texts and materials, rejection from family members and friends, and

and isolation from the broader community. (23) Moreover, similarly to India, acts such as praying for communities can be purposefully misconstrued as acts of conversion in order to target minority communities for arrest.

In March 2020, Nepalese authorities arrested Pastor Keshav Acharya in response to a video that circulated of him online in which he was encouraging his church congregation to pray for an end to the COVID-19 pandemic. Despite that the video transcript shows Pastor Keshav saying “I rebuke you, corona, in the name of Lord Jesus Christ. By the power of the ruler of this Creation, I rebuke you...”, authorities accused him of purposefully misleading the general public by providing false information about the COVID-19 pandemic and claiming that Jesus could stop the virus’s spread.(24) It is essential to note that during his church service, while Pastor Keshav did pray for Jesus to deliver healing upon those afflicted, he did not in any way discourage congregants from also seeking out necessary medical treatment in the case that they became ill. Regardless, Nepalese authorities detained him for two weeks before releasing him on a 5,000 rupees (≈ USD \$42) bail. However, Pastor Keshav’s respite from detention did not last long as he was re-arrested under charges of “outraging religious feelings” and “attempting to convert” people, for which he was fined 500,000 rupees (≈ USD \$4,200). When his wife was able to pay bail after nearly a month and Keshav was released again, he was swiftly arrested a third time and transported in a 72-hour long

grueling journey to the isolated district of Dolpa, during which he had his hands chained to his back and was provided insufficient food. In December 2021, it was revealed that a second, separate court had sentenced Pastor Keshav to two years’ imprisonment for conversion, and while he had recently been granted bail and was able to spend Christmas with his family, we remain concerned that he may be summoned at any point to return to detention for a fourth time. It is also of great concern that Pastor Keshav’s case marks the first official incident in which an individual has been convicted and sentenced according to Nepal’s “anti-conversion law”; this is a concerning trend and requires international advocacy so that there are no future similar cases.

Though Pastor Keshav’s case was the first instance of sentencing under Nepal’s anti-conversion law, there have been numerous incidents in which individuals were briefly detained and questioned for their faith activities. In August 2019, authorities



arrested an elderly Christian Nepalese man for distributing bibles under the charges that he was attempting to forcefully convert individuals to Christianity. Since his release from prison, he has been in and out of hospital with health issues he claims he acquired during his time in prison.(25) In February 2020, the Nepalese Government deported three Taiwanese nationals and two Japanese nationals for using their tourist visas to spread Christianity while in Nepal.(26) In late September 2021, a group of four Korean nationals – Park Byonsuk, Kim Hingkung, Li Jionga, and Kim Yongheli – were arrested and charged with illegal proselytism by the Kaski district court for their work operating Ann Paul Guest House at Prithvi Chowk; the court had alleged that the individuals were “teaching Bible verses to children under the pretext of providing free tuition to orphans” and other disadvantaged children.(27) Fortunately, the four Korean women were released in November.(28)

In a similar incident in 2017, Nepalese Pastor Hari Tamang took in a large group of orphaned children after the orphanage headmaster informed him that the building would be soon shut down and the children would be left helpless. However, only ten days after Pastor Tamang began caring for the group of children, Nepalese authorities arrested him on charges of human trafficking and attempted religious conversion, for which he was forced to pay a 50,000 rupees (≈ USD \$400) bail in order to be released. However, though he was released from detention after paying this fine, Pastor Tamang, his staff, and the

children he takes care of continue to be harassed by Nepalese police who accuse him of religious conversion. In 2021, Pastor Tamang explained that “we don’t force people to convert their religion. My case is still ongoing. Every month I have to go the court”; having already appealed his prison sentences at the district court and state court and being rejected both times, Pastor Tamang’s case is currently before the Supreme Court. In 2019, Mr. Dilli Ram Paudel, general secretary of Nepal Christian Society, was detained by authorities for illegal conversion after he attended a seminar and distributed Bibles.(29)

Nepalese authorities have also increasingly targeted Jehovah’s Witnesses in evangelism- and proselytism-related arrests. In February 2020, five Nepali citizen Jehovah’s Witnesses were arrested and detained for nearly a whole month on evangelism charges before they were released on a hefty bail of 200,000 rupees (≈ USD \$1,600) per individual. One month later in March, two US citizen Jehovah’s Witnesses were arrested on charges of proselytism while they were visiting their friends’ home; though they were detained for a shorter period of time (11 days) than their Nepalese counterparts, their bail amount for release was set higher at 230,000 rupees (≈ USD \$1,800). In a strange turn of events, however, Kaski district court re-summoned the two US citizens and fined them an additional 200,000 rupees each, and after they paid their second bail amount in full their original 230,000 rupees bail was refunded.(30)

RECOMMENDATIONS

Abolish apostasy and anti-conversion laws, as well as all legislations and policies that impose criminal punishments for peaceful manifestations of freedom of religion or belief;

Guarantee the full enjoyment of the right to freedom of religion and belief, including by strengthening measures aimed at protecting persons belonging to religious minorities from violence and persecution;

Enhance the promotion and protection of the right to freedom of thought, conscience and religion, including the right to manifest such individually or in community with others in public or private, in worship, observance, practice and teaching, in compliance with India's obligations under the ICCPR;

Cease the practice of imprisoning faith minorities on charges of apostasy and conversion, and release unconditionally and with immediate effect all religious prisoners of conscience.



REFERENCES

- (1) [Algeria], [Algeria's Constitution of 2020](#).
- (2) [Algeria], [Republique Algerienne Democratique et Populaire](#) *Presidence de la Republique*, Code Penal, 2009.
- (3) Jubilee Campaign, "[Letter to UN Special Rapporteur on Freedom of Opinion and Expression - The Case of Hamid Soudad](#)", 13 August 2021.
- (4) Jubilee Campaign, [Suleiman Bouhafis](#).
- (5) International Institute for Religious Freedom, "[Algeria: Christian charged with proselytism risks 5 years in prison](#)", 23 June 2017.
- (6) Jubilee Campaign, [Rachid Seighir](#).
- (7) Palais Des Nations, *Mandats due Rapporteur special sur la liberte de religion ou de conviction; du Groupe de travail sur la detention arbitraire; de la Rapporteuse speciale sur la promotion et la protection du droit a la liberte d'opinion et d'expression et du Rapporteur special sur les questions relatives aux minorites*, [AL DZA 10/2021](#), 26 November 2021.
- (8) Jubilee Campaign, [Foudhil Bahloul](#).
- (9) Kamel Abderahmani, "[The Algerian state, Sunni Islam and violations of religious freedom](#)", *Asia News*, 18 December 2020. ; International Institute for Religious Freedom, "[Two Kabyl Christians sentenced to heavy prison terms](#)", 8 January 2021.
- (10) Ashraq Al-Awsat, "[Tebboune Says No 'Prisoners of Conscience' in Algeria](#)", 10 August 2021.
- (11) [The Constitution of India](#) [India], 26 January 1950.
- (12) [The Indian Penal Code](#) [India], 6 October 1860.
- (13) Evangelical Fellowship of India Religious Liberty Commission, [Hate and Targeted Violence against Christians in India: Yearly Report 2021](#), 15 February 2022.
- (14) Maulshree Seth, "[Explained: Uttar Pradesh's 'love jihad' law, and why it could be implemented vigorously](#)", *The Indian Express*, 5 December 2020. ; Roli Srivastava, "['Love jihad' law seen trampling women's hard-earned freedoms in India](#)", *Reuters*, 15 January 2021.
- (15) Lauren Frayer, "[In India, boy meets girl, proposes - and gets accused of jihad](#)", *NPR*, 10 October 2021.
- (16) Apporvanand, "[India's 'love jihad' laws: Another attempt to subjugate Muslims](#)", *Al Jazeera*, 15 January 2021.
- (17) S Raju, "[Woman detained under UP's new law against 'love jihad' suffers miscarriage](#)", *Hindustan Times*, 13 December 2020.
- (18) Al Jazeera, "[Another BJP-governed Indian state plans anti-conversion law](#)", 26 December 2020.
- (19) Mariyam Alavi, "[With No Credible Evidence, 'Love Jihad' Cases In Kanpur Crumble](#)", *NDTV*, 28 November 2021.
- (20) Hannah Ellis-Petersen & Ahmer Khan, "['They cut him into pieces': India's 'love jihad' conspiracy theory turns lethal](#)", *The Guardian*, 21 January 2022.
- (21) [Nepal] [Constitution of Nepal](#), September 2015.
- (22) Rhema Subedi, "[Criminal Code 2074 Enacted by the President](#)", *Nepal Church*, 18 October 2017. ; Ministry of Law, Justice and Parliamentary Affairs [Nepal], [The National Criminal Procedure \(Code\) Act, 2017](#), 16 October 2017.
- (23) Open Doors World Watch Research, [Nepal: Country Dossier](#), February 2020.
- (24) Jubilee Campaign, [Nepal UPR](#), March 2020. ; Jubilee Campaign, [Keshav Acharya](#).
- (25) Seraph News, "[Christian crackdown: Elderly man jailed in Nepal for handing out bibles](#)", 13 August 2019.
- (26) United States Department of State, [2020 Report on International Religious Freedom: Nepal](#), 12 May 2021.
- (27) Open Doors World Watch Research, [Nepal: Full Country Dossier](#), December 2021. ; Nepal Church, "[Four foreigners jailed for false proselytizing](#)", 28 September 2021.
- (28) Rock Ronald Rozario, "[Korean missionary nuns granted bail in Nepal on conversion charges](#)", *Union of Catholic Asian News*, 19 November 2021.
- (29) Shilu Manandhar, "[Christians Say Police Target Them for Their Faith](#)", *Global Press Journal*, 24 January 2021.
- (30) United States Department of State, [2020 Report on International Religious Freedom: Nepal](#), 12 May 2021.