

briefing

India

Religiously-Motivated Violence & Discrimination against Christians

FOR PUBLIC USE

JANUARY-DECEMBER 2008



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“Organized groups claiming adherence to religious ideologies have unleashed an all-pervasive fear of mob violence in many parts of the country”.

UN Special Rapporteur on freedom of religion or belief, January 2009.

I. Executive Summary

2008 saw a continued pattern of religiously-motivated violence perpetrated against the Christian community across numerous states. This included large-scale violence in Orissa state in the weeks after 23 August 2008, the ramifications of which are ongoing, and a sustained campaign of violence in Karnataka state during a similar period. Impunity for perpetrators and inciters of religiously-motivated violence, and the weak implementation of laws to protect religious minorities from violent reprisals, continued to be very significant problems.

At the root of many of the issues discussed in this briefing is the ideology of 'Hindutva', the politically extreme, nationalist interpretation of Hinduism, which, in practice, seeks to preserve and defend the cultural hegemony of Hinduism at the expense of minority religions and which propagates a culture assuming the illegitimacy of religious conversions (section 3).

The final third of 2008 saw the worst spate of 'communal violence' ever faced by the Christian community in post-independence India, centred on Kandhamal district but spreading across Orissa state (section 5.2). The violence was catalysed by the assassination of the local figurehead of the radical Hindu nationalist group, Vishwa Hindu Parishad (VHP), on 23 August by unknown assailants. By 24 August, mobs were rampaging around the district, setting up roadblocks, shouting Hindu nationalist and anti-Christian slogans and openly blaming Christians for the killing of Saraswati and calling for revenge, as they launched attacks on Christian targets. The violence resulted in the killing of 70 (with more than 50 unaccounted for) and the displacement of at least 50,000, and was characterised by brutal violence and forcible conversions to Hinduism. The roots of this violence lie principally in the systematic propagation of hatred and violence against Christians by proponents of 'Hindutva', while also co-opting *adivasis* (Scheduled Tribes) into Hinduism. The most pressing concerns, as of January 2009, included the filing and proper investigation of cases by police, the delivery of compensation and addressing the humanitarian situation.

Religiously-motivated violence against Christians was also a particularly significant problem in Karnataka (section 5.3), including an intense period of seemingly co-ordinated attacks on church targets between August-October 2008, concentrated largely in coastal Dakshina Kannada district, with smaller numbers of attacks also taking place in other areas. Coastal Karnataka is reputed as an area in which Hindu nationalist organisations have been active for over fifteen years in propagating the 'Hindutva' agenda.

Police negligence or complicity in response to religiously-motivated violence remained a pervasive problem, including allegations of severe negligence in Orissa and participation in anti-Christian violence in Karnataka.

Despite the existence of strong constitutional protections for religious freedom, there exist two significant legislative restrictions. Firstly, the designation of Scheduled Castes is linked to religious affiliation, so Dalits who convert to other religions lose their eligibility for the 'reservation' system (section 4.1), and violence against them cannot be litigated under the Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989. Secondly, India's seven state-level Freedom of Religion Acts, known informally as 'anti-conversion laws', pose a threat to freedom of religion through their restriction of religious conversions and their damaging normative effect on religious minorities (section 4.2).

The UN Special Rapporteur on freedom of religion or belief published a report after her mission to India in 2008, which raises concern on each of these issues. It is strongly recommended that the government of India should be urged to implement the recommendations of this briefing (section 2).

2. Recommendations

2.1. To the government of India

It is recommended that the government of India should implement the recommendations of the UN Special Rapporteur on freedom of religion or belief given in her report of her 2008 mission to India.¹

In particular, CSW recommends that the government of India should:

1. Adopt and implement the recommendations of the Justice Ranganath Mishra National Commission for Religious and Linguistic Minorities, specifically that the eligibility for membership of the Scheduled Castes should not be linked to religious status;
2. Condemn and take steps towards the repeal of Freedom of Religion Acts ('anti-conversion laws') in Arunachal Pradesh, Chhattisgarh, Gujarat, Himachal Pradesh, Madhya Pradesh, Orissa and Rajasthan states;
3. Take measures to ensure the full and effective implementation of all laws protecting religious minorities from religiously-motivated violence, take increased measures to prevent communal violence and bring perpetrators and inciters of religiously-motivated violence to justice under the provisions of the law;
4. Strongly urge the state government of Orissa to implement the following measures in response to the communal violence:²
 - a. Ensure that (with reference to the ruling of the Supreme Court)³ police unfailingly assist victims of violence to submit First Information Reports (FIRs);
 - b. Investigate reports of police officers failing to register cases or showing complicity in attacks, and bring prosecutions against offending officers;
 - c. Supply a substantial number of investigating officers and public prosecutors, and implement fast-track courts in at least four locations in Kandhamal district, giving serious consideration to the need for a suitable atmosphere for victims and witnesses to testify in order to expedite prosecutions and convictions;
 - d. Investigate the forcible conversion of Christians to Hinduism and prosecute perpetrators under the provisions of the Indian Penal Code;
 - e. Request that the Central Bureau of Investigation (CBI) carry out an investigation into the assassination of Swami Lakhmananda Saraswati and the subsequent anti-Christian violence, paying specific attention to the root causes of this violence, including the propagation of anti-Christian hatred;
 - f. Undertake the following actions with regard to relief camps, taking into consideration the UN Guiding Principles on Internal Displacement⁴: provide an adequate standard of living to the inhabitants of relief camps, in accordance with the definition given in Principle 18; provide the means necessary for inhabitants to vote (Principle 22); provide education to displaced children (Principle 23); ensure that camps continue until the establishment of suitable conditions and the means for the displaced persons

¹ "Report of the Special Rapporteur on freedom of religion or belief, Asma Jahangir: Addendum: Mission to India", A/HRC/10/8/Add.3, 26 January 2009 (<http://www2.ohchr.org/english/bodies/hrcouncil/10session/reports.htm>).

² These recommendations closely follow those issued by Christian leaders from across several denominations in a memorandum to political parties in advance of the 2009 general election.

³ Writ Petition (Criminal) no. 68 of 2008 (<http://www.supremecourtindia.nic.in/wr6808.pdf>).

⁴ "Guiding Principles on Internal Displacement" (<http://www.unhcr.ch/html/menu2/7/b/principles.htm>).

- to return voluntarily, in safety and with dignity, to their homes, or to resettle voluntarily (Principle 28);
- g. Undertake to follow the recommendations of the National Commission for Minorities (NCM) in September 2008 on the establishment of peace committees, and further to take measures to ensure that all communities are adequately represented within such peace committees, to enable these to promote reconciliation and inter-communal understanding with integrity;⁵
5. Implement the following measures in response to the communal violence in Orissa:
 - a. Take measures to ensure that the “Guidelines on Communal Harmony”,⁶ as issued by the Ministry of Home Affairs, are properly implemented;
 - b. Provide further compensation for those who have been affected by the violence, including covering the loss of crops, livestock and employment, and assess required levels of compensation on a case-by-case basis through certified independent evaluators;
 6. Take measures to tackle impunity in cases of religiously-motivated violence and evidence of communal bias in the police and judiciary (particularly at local levels) and their influencing by state authorities, including by implementing the recommendations of the National Police Commission (1981) and other relevant commissions;
 7. Carry out a full investigation into the nationwide activities of extremist groups accused of the incitement and perpetration of violence against minority groups, including Hindutva, Islamist and Naxalites organisations, ban those groups which are guilty of this charge and rigorously enforce this ban;
 8. Take measures to investigate allegations against media for stirring communal grievances and bring prosecutions where appropriate; and promote compliance with the Press Council “Norms of Journalistic Conduct” (2005);⁷
 9. Ensure that an active Commission for Human Rights and Commission for Minorities (in the model of their national counterparts), is operational in every state, and that members of each commission are appointed by transparent and non-partisan procedures.

2.2. To states and regional actors

It is recommended that states and regional actors should use appropriate means of dialogue with the government of India to encourage the implementation of each of the recommendations given in section 2.1 above. It is particularly recommended that states and regional actors should encourage the government of India to implement the recommendations of the UN Special Rapporteur on freedom of religion or belief given in her report of her 2008 mission to India.

⁵ “Report of the Visit of the Vice Chairperson, NCM to Orissa – 11th to 13th September 2008” (<http://ncm.nic.in/doc/Tour%20Report%20VC%20Orissa%20Sep.%2008.doc>).

⁶ “Guidelines on Communal Harmony” (<http://mha.nic.in/pdfs/GlinesCmnlHrmny120908.pdf>).

⁷ Press Council of India “Norms of Journalistic Conduct” (<http://presscouncil.nic.in/norms.htm>).

3. Introduction: Hindu nationalism and religious minorities

This briefing outlines the patterns and known incidents of religiously-motivated violence against Christians and their property in 2008. This included the serious outbreak of violence against the Christian community in Orissa, which began in August 2008, and systematic violence in Karnataka during the same period. It also outlines two significant legislative restrictions to freedom of religion: state-level 'anti-conversion laws' and the religious conditionality attached to the definition of the Scheduled Castes, which governs eligibility for the 'reservation' system of quotas in the public sector and effectively imposes socio-economic penalties on Dalit converts to Islam or Christianity.

Anti-Christian violence and legislative obstructions to religious freedom point to an asymmetrical anti-conversion culture in India, which belongs to the ideology of Hindu nationalism, identified largely with the term 'Hindutva'.⁸ In contemporary popular usage, 'Hindutva' describes the politically extreme, nationalist interpretation of Hinduism, which encompasses a vision of India as a Hindu nation into which minorities must be assimilated, and revere the Hindu religion, race and culture. In practice, Hindu nationalism seeks to preserve and defend the cultural hegemony of Hinduism at the expense of minority religions. Islam and Christianity are perceived as foreign to India, and the Hindu nationalist discourse centred on 'conversion' contributes to the construal of Christians as a 'threatening other'. A wide range of Christian activities, particularly those involving Dalits and 'low' castes, are misrepresented as attempts to convert others from Hinduism by illegitimate means. These misrepresentations are then used to justify violent reprisals against churches and individual Christians, often carried out by large mobs.

The ideology of 'Hindutva' is espoused by the extremist Hindu nationalist groups known collectively as the Sangh Parivar, comprising the Rashtriya Swayamsevak Sangh (RSS) and its subsidiary and associated organisations. These include the Vishwa Hindu Parishad (VHP), the religious and cultural wing of the Sangh Parivar, which effectively functions as an agency for grassroots mobilisation and was heavily implicated in the anti-Christian violence in Orissa. The Bajrang Dal, the youth wing of the VHP, is often involved into anti-Christian violence. The Bharatiya Janata Party (BJP) is the political wing of the Sangh Parivar and holds power singly in Chhattisgarh, Gujarat, Himachal Pradesh, Karnataka, Madhya Pradesh, and Rajasthan forms part of coalition governments in Bihar, Meghalaya, Nagaland, Punjab and Uttarakhand. However, in the political arena, the agenda of 'Hindutva' is not entirely unique to the BJP.

Negligent police responses to cases of religiously-motivated violence are most common in areas with a significant Sangh Parivar presence, particularly across the states of Chhattisgarh, Madhya Pradesh and Orissa, and in southern Karnataka. Police in these states commonly reflect the religiously discriminatory agenda of 'Hindutva', partly as a result of political pressure from the state governments to whom they are answerable.

The approach of Hindu nationalists to religious conversions is asymmetrical, in that conversions to Hinduism are commonly described by the term *ghar-vapsi* (translated as 'homecoming' or 're-conversion'), which carries a strongly implied legitimacy. Conversions away from Hinduism are portrayed in Hindu nationalist discourse as illegitimate, anti-national and a threat to India's cultural integrity. This perspective has fuelled the antipathy towards Christians which lies behind much of the violence described in this briefing and accounts for the coercive conversions to Hinduism which characterised the communal violence against Christians in Orissa.

⁸ This term was coined by Hindu nationalist ideologue Vinayak Damodar Savarkar in his 1923 book, *Hindutva: Who is a Hindu?*

4. Legislative restrictions on religious freedom

4.1. Religious discrimination in Scheduled Caste status

Under current legislation, the designation of Scheduled Castes, who are eligible for the 'reservation' system of quotas in public sector education and employment, is linked to religious affiliation: Scheduled Castes include only Hindus, Sikhs and Buddhists. Dalits who convert to other religions, usually Christianity or Islam, lose their status as Scheduled Castes and consequently their eligibility for the 'reservation' system. Since caste-based discrimination continues to be practised to some extent in all religious communities, and Dalit converts are typically regarded in society as Dalits irrespective of their religious faith, this effectively imposes social and economic penalties for those embracing Christianity and Islam. In practice, it has also resulted in the concealment of religious affiliation by beneficiaries of reservations who are afraid of losing their jobs. Additionally, violence against them cannot be litigated under the Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989, a law designed to protect Dalits and *adivasis* from the particular forms of violence, humiliation and exploitation which they face.

This configuration is being challenged through a Supreme Court case, brought in 2004.⁹ In response to the court's request for an opinion, the government appointed the National Commission for Religious and Linguistic Minorities (NCRLM) to undertake a study and issue a recommendation. In May 2007, the NCRLM recommended that Scheduled Caste status should no longer be linked to religious identity. The National Commission for Scheduled Castes and the National Commission for Minorities (NCM) subsequently issued recommendations to the same effect.¹⁰ However, throughout 2007 and 2008 the government did not deliver its opinion to the court, and the case was repeatedly adjourned.

The removal of a link between Scheduled Caste status and religious affiliation has been condemned by Hindu nationalist groups, including the RSS. This reaction corresponds to the 'Hindutva' agenda, as the adoption of the NCRLM recommendations would remove a significant socio-economic disincentive to conversions away from Hinduism.

Two recent UN reports have recommended a change in the law to restore the eligibility for Scheduled Caste status to those who convert to another religion. These are: the report of the UN Special Rapporteur on freedom of religion on her 2008 mission to India (paragraph

⁹ Writ Petition (Civil) no. 180 of 2004, filed by the Centre for Public Interest Litigation with Mr Franklin Caesar Thomas. This has been combined with three other writ petitions from 2005-06, two of which concern Dalit Christians and one of which concerns Dalit Muslims.

¹⁰ The National Commission for Minorities report, "Dalits in the Muslim and Christian Communities", January 2008, is available at <http://ncm.nic.in/pdf/report%20dalit%20%20reservation.pdf>. The National Commission for Scheduled Castes gave its recommendation with the caveat that reservations for Dalit Christians and Muslims should not encroach upon the existing 15% reservations for Scheduled Castes, which would constitute a serious challenge, given that additional proposed reservations for the Other Backward Classes would take the total quotas to just below the 50% limit set by the Supreme Court in 1963. Reservation quotas are currently set as follows: 15% for Scheduled Castes; 7.5% for Scheduled Tribes; 27% for Other Backward Classes, excluding the 'creamy layer'. The latter was recommended by the Mandal Commission in 1980 and became highly controversial; it was upheld by the Supreme Court in 1993. The current reservation quotas total 49.5%, leaving room of only 0.5% under the 50% limit.

71)¹¹ and the Concluding Observations of the UN Committee on the Elimination of Racial Discrimination (paragraph 21)¹².

4.2. Anti-conversion legislation

India's seven state-level Freedom of Religion Acts, known informally as 'anti-conversion laws', pose a threat to freedom of religion through their restriction of religious conversions and their damaging normative effect on religious minorities. In the report of her 2008 mission to India, the UN Special Rapporteur on freedom of religion or belief indicated that she was "deeply concerned that laws and bills on religious conversion in several Indian states are being used to vilify Christians and Muslims" (paragraph 47). She concluded that these "should be reconsidered since they raise serious human rights concerns" (paragraph 70).

'Anti-conversion legislation' reflects Hindu nationalist antipathy towards conversions away from Hinduism. Although they have tended to belong within the agenda of the BJP and its political forebears, it was the Indian National Congress Party-appointed "Niyogi Committee Report on Christian Missionary Activities in Madhya Pradesh" in 1956 that paved the way for the passage of the earliest 'anti-conversion laws', and the Orissa, Madhya Pradesh (out of which was created the state of Chhattisgarh) and Himachal Pradesh laws were passed by non-BJP governments.

4.2.1. Status of laws

The status of the respective laws, as of January 2009, is as follows:

- Orissa (1967): in force;
- Madhya Pradesh (1968): in force, but 2006 amendment not ratified;
- Chhattisgarh (1968): in force, but 2006 amendment not ratified;
- Arunachal Pradesh (1978): introduced, but not implemented;
- Gujarat (2003): in force;
- Himachal Pradesh (2006): in force;
- Rajasthan (2008): introduced, but pending ratification by governor.

Two changes in the status of 'anti-conversion laws' occurred in 2008: in Rajasthan, a new law was passed in March to replace the 2006 law, but has not been ratified by the state governor; and in Gujarat, a set of rules was published in the state Government Gazette on 1 April, which allowed the 2003 law to be implemented.

4.2.2. Summary of concerns

Each state-level 'anti-conversion law' ostensibly aims to prohibit the conversion of others, by means of ill-defined conditions of 'force', 'fraudulent means' and 'allurement' or 'inducement'. Each law also imposes legal formalities on religious priests conducting 'ceremonies' for conversion and would-be converts to a new religion. With the exception of the Madhya Pradesh and Chhattisgarh 'anti-conversion laws', which are identical, each of the seven laws and their amendments contain slightly different nuances.

However, the following concerns are applicable to each of the laws:

- I. The necessity for the laws is highly questionable. There is no evidence among any religious minority of forced or fraudulent conversions; this is indicated by the lack of any prosecutions under 'anti-conversion laws'. The pursuit of conversions by any

¹¹ "Report of the Special Rapporteur on freedom of religion or belief, Asma Jahangir: Addendum: Mission to India", A/HRC/10/8/Add.3, 26 January 2009

(<http://www2.ohchr.org/english/bodies/hrcouncil/10session/reports.htm>).

¹² "Concluding Observations of the Committee on the Elimination of Racial Discrimination", CERD/C/IND/CO/19, 5 May 2007

(<http://www2.ohchr.org/english/bodies/cerd/docs/CERD.C.IND.CO.19.doc>).

such illegitimate means could be addressed under the existing provisions of Indian law, including sections 295A¹³ and 298¹⁴ of the Indian Penal Code (IPC).

2. There is no evidence to support the view that the laws alleviate inter-religious tensions, but instead they appear to have a damaging normative effect for religious minorities and they contribute towards stigmatising religious conversions and, by extension, a wide range of religious activities. This is contrary to the justification sometimes given for these laws.¹⁵ With specific reference to the Christian community, religiously-motivated violence in states both with and without 'anti-conversion legislation' is often justified by accusations that the victims were attempting to convert others, and it is not uncommon that such attacks receive the complicity of police while the perpetrators enjoy impunity. In her 2008 report, the UN Special Rapporteur on freedom of religion or belief found that "such laws or even draft legislation have had adverse consequences for religious minorities and have reportedly fostered mob violence against them".
3. The laws impose significant and burdensome restrictions on the constitutionally- and internationally-protected rights to freely adopt, change, profess, practise, teach and propagate religion. This fact was strongly articulated by the UN Special Rapporteur on freedom of religion or belief in her report on her 2008 mission to India: "The Special Rapporteur would like to add that, according to universally accepted international standards, the right to freedom of religion or belief includes the right to adopt a religion of one's choice, the right to change religion and the right to maintain a religion. She highlights the fact that these aspects of the right to freedom of religion or belief have an absolute character and are not subject to any limitation whatsoever" (paragraph 51). Article 18 of the International Covenant on Civil and Political Rights (ICCPR), which is binding upon India, protects an individual's "freedom to have or adopt a religion of his choice", while Article 18 of the UDHR provides for an individual's "freedom to change his religion or belief". Article 25 of the Indian constitution protects "the right to freely profess, practise and propagate religion". However, the 'anti-conversion laws' impose burdensome administrative restrictions on the right to change and the right to propagate religion, principally as follows:
 - The requirement upon those "performing any ceremony" for a conversion, or taking part in any such ceremony to seek prior permission (as in Gujarat) or to send an intimation to the district authorities with details about the conversion;
 - The imposition of similar legal requirements upon the person intending to convert, including to provide prior notice of his/her intention to convert, with the district magistrate empowered to enquire into this matter (as in Himachal Pradesh and Rajasthan 2008), or to provide notification of his/her conversion to the district magistrate.

As a result of these requirements, combined with social pressures, the political influence of extremist Hindu nationalist groups, the hostility of Hindu nationalist authorities to conversions and the realities of the hierarchical caste system, potential converts often face practically insurmountable obstacles to religious conversions. The significance of these obstacles has been confirmed by testimony which CSW has heard consistently in several states.

¹³ Section 295A of the IPC criminalises "Deliberate and malicious acts, intended to outrage religious feelings of any class by insulting its religion or religious beliefs".

¹⁴ Section 298 of the IPC criminalises "Uttering words, etc., with deliberate intent to wound the religious feelings of another person".

¹⁵ The "Statement of Objects and Reasons" in the Rajasthan Freedom of Religion Bill 2006 states that: "In order to curb such illegal activities [as unlawful conversions] and maintain harmony amongst persons of various religions, it has been considered expedient to enact a special law for the purpose".

4. The conditions under which conversions are construed as illegitimate are defined with sufficient vagueness as to allow a wide range of activities undertaken by religious groups, including charitable services and education, to be portrayed as attempts to convert. For example, each of the laws include in the definition of force "a threat of divine displeasure or social excommunication", or in the definition of fraud "any other fraudulent contrivance". 'Allurement' or 'inducement' include the offer of "any gift or gratification". These vague definitions leave legitimate religious activities in a position of legal vulnerability and susceptibility to social pressure or, as in many cases, violent assault.
5. The various religious parties and the nature of conversion between them are defined inconsistently and asymmetrically, leaving religious minorities vulnerable to the unequal administration of justice. The principal problem concerns the overly broad legal definition of Hinduism: a 1995 Supreme Court decision said in part, "When we think of the Hindu religion, we find it difficult, if not impossible, to define the Hindu religion or even adequately describe it....It may broadly be described as a way of life and nothing more".¹⁶ A distinction is made in Hindu nationalist discourse between conversions away from Hinduism and conversions to Hinduism, based on the view that Hinduism is the default 'way of life' for Indians. Conversions to Hinduism are described using the term, *ghar vapsi*, which is translated as 'homecoming' or 're-conversion'. Meanwhile, 'conversion' is construed within Hindu nationalist discourse as the adoption of a religion other than Hinduism. The language of the 'anti-conversion laws' consistently reflects a preference for ancestral or indigenous religions and thereby serves the Hindu nationalist agenda: the Himachal Pradesh law exempts from its remit any person who "reverts back to his original religion", in what appears to be a reference to 're-conversions'; the Rajasthan law defines a conversion as renouncing the "religion of one's forefathers" and "adopting another"; and the now-withdrawn 2006 amendment to the Gujarat law defined the Buddhist and Jain religions as 'denominations' of Hinduism, thereby exempting them from the conditions imposed by the law but failing to recognise their distinct religious identities (this attracted widespread criticism from Jain groups before it was rejected as unconstitutional by the state governor).
6. The penal provisions seem disproportionately harsh in the more recent laws, exceeding even those given for causing death by negligence. In the Orissa, Madhya Pradesh, Chhattisgarh, Gujarat and Himachal Pradesh laws, the penal provisions are increased substantially for those convicted for converting Dalits (Scheduled Castes) and tribals (Scheduled Tribes); this is often adduced as evidence that the prevention of these socially excluded groups from adopting a new religion is a chief aim of this legislation.

¹⁶ Appeal (Civil) no. 2836 of 1989.

5. Religiously-motivated violence against Christians

5.1. Overview: patterns in anti-Christian violence in 2008

The most serious anti-Christian violence of India's post-independence history took place in Orissa state, following the assassination by unknown assailants of local VHP figurehead Swami Lakhmananda Saraswati on 23 August. The violence claimed a significant number of lives and led to the mass displacement of Christians from Kandhamal district. This was prefigured by an outbreak of anti-Christian attacks in December 2007. An account and analysis of this violence is given in section 5.2 below.

After Orissa, the state with the highest rate of reported religiously-motivated violence against Christians was Karnataka. This state saw a particular concentration of attacks in the period between August and October, largely in the coastal district of Dakshina Kannada, which was catalysed by allegations made against a pamphlet falsely attributed to the New Life Fellowship Trust. Police were heavily criticised for their responses to this violence, which included violence against Christians and their property.

More sporadic, if nonetheless frequent, attacks were reported in several other states, with some of the most egregious religiously-motivated violence occurring in Chhattisgarh and Madhya Pradesh, as in previous years. The nature and severity of attacks varied, but included mob violence against persons and arson or other forms of assault on buildings used for worship. Many attacks were perpetrated in connection with unsubstantiated allegations of 'forcible' or 'fraudulent' conversions, and their targets included Christian leaders, congregations, evangelists, nuns and Christian charitable workers.

Impunity was a continued, and deeply entrenched, problem with respect to religiously-motivated violence. In many cases, attacks took place with tacit or active police complicity or involvement in the violence, and the lack of effectual punishment for perpetrators of anti-minority violence was the norm.

The NCM played a valuable role in the investigation of the violence in Orissa and Karnataka, but since it lacks in constitutional status, there is no obligation on the government to implement its recommendations. It also has no legal authority over government officials.

This briefing does not purport to provide an exhaustive catalogue of religiously-motivated violence against Christians. It is highly likely that further attacks took place which were not reported owing to numerous factors, including communication difficulties, deficiencies in the reporting mechanisms in some states and the occasional reticence of church leaders in notifying police or NGOs, for fear of further reprisals. Additionally, it was not possible to verify all reports which CSW received. However, this section does provide an overview of the nature and extent of religiously-motivated violence against people and property, targeted at the Christian community across India. In each state after Orissa, one or two exemplar incidents are highlighted in more detail than the others.

5.2. Orissa

5.2.1. Summary of communal violence centred on Kandhamal district

The final third of 2008 saw the worst spate of 'communal violence' ever faced by the Christian community since India gained independence in 1947, centred on Kandhamal district in Orissa and spreading to at least thirteen other districts of that state. The violence was catalysed by the assassination of Swami Lakhmananda Saraswati, the local figurehead of the radical Hindu nationalist group, VHP, on 23 August by unknown assailants (believed to have been Maoist, or Naxalite, insurgents). By 24 August, mobs were rampaging around the

district, setting up roadblocks, shouting Hindu nationalist and anti-Christian slogans and openly blaming Christians for the killing of Saraswati and calling for revenge as they launched attacks on Christian targets.

Overall, at least 50,000 were displaced and 70 killed, with more than 50 unaccounted for, presumed dead. Although the violence receded after around eight weeks, sporadic murders have continued and, reportedly, Christians attempting to return to their villages have continued to face coercion to convert to Hinduism. The population of the relief camps has declined, although, as of early February 2009, the All India Christian Council (aicc) estimated that 14,000 remained in state-run and private camps. Police were initially overwhelmed, and road blockades were used by the perpetrators of the attacks to impair the mobility of security services in the region. Several hundred cases are known to have been registered by police as of January 2009, including 622 by the Christian Legal Association (CLA), but widespread allegations of police negligence during the weeks after the violence began remain unanswered. Also, as of January 2009, the delivery of compensation had been extremely minimal.

CSW conducted a fact-finding mission to Orissa to hear testimony from victims and eyewitnesses of the violence and the analysis of observers of the violence, including local NGO leaders and Christian and Hindu civil society leaders. CSW heard a considerable body of testimony from the victims about the character of the violence. This included murders, some of which were by burning or burying alive, retributive rape, the widespread destruction of churches and Christian property and forcible conversions to Hinduism.

In one of the most egregious attacks, a nun was raped on 25 August. According to eyewitness reports relayed by a Catholic priest, she and another priest named Fr Thomas had been stripped of their clothes and paraded in the village. She was then locked in a room, which numerous men and entered and exited. Meanwhile, Fr Thomas was beaten severely, to an extent that witnesses did not know whether he would survive; they appealed for help from police, in whose presence the attack reportedly took place, but police said they were 'helpless'. The nun later made a bold public plea for the Central Bureau of Investigation (CBI) to open an enquiry into her case, as she did not trust local police.

A retired army officer described the death of his paralysed brother, which he witnessed from nearby: two members of a 300-strong mob wielding weapons and bamboo sticks entered the house, where they poured fuel over his brother and set him on fire. A Catholic priest reported the forcible conversion of his father, a catechist, on 27 August: he had had an axe held to his neck by members of a mob and was forced to renounce his Christian faith in favour of Hinduism. Subsequently, he was repeatedly escorted to a Hindu temple for worship. In another case, a pastor named Samuel Nayak refused to renounce his faith and his lips were cut off in retribution for his preaching, before kerosene was poured over his head and he was set on fire. His elderly mother, who was deaf and mute, was thrown onto the fire and also died. A large number of reports of similar cases of forcible conversion to Hinduism have also emerged. Forcible conversions to Hinduism, together with killings, looting and the destruction of churches and Christians' houses, were widely testified to by those who had fled the violence to Bhubaneswar. They also testified that attackers usually chanted extreme Hindu nationalist and anti-Christian slogans.

This was the second outbreak of violence against the Christian community in Kandhamal district in a period of nine months.¹⁷ There was little effective prosecutorial or remedial

¹⁷ For detail on the December 2007 attacks, see the CSW report, "India: Religious Violence and Discrimination against Christians in 2007" (<http://dynamic.csw.org.uk/article.asp?t=report&id=102>), section 5.2.

action taken after the attacks in December 2007, despite recommendations made by the NCM.¹⁸ Impunity facilitated the second, more serious outbreak of violence, which has effectively sought the eradication of the Christian community from Kandhamal district. Consistent reports emerged during the recent violence of chronic police failures to protect the victims from the attacks.

Further impunity would damage severely the prospects for a return of stability to the areas affected by the violence. An additional security threat is posed by a new Maoist group aligned with the Hindu nationalists, although the extent of its impact is yet unknown.

5.2.2. Context: demographics and economics

The violence was centred in Kandhamal district, central Orissa. The demographic and economic data about this district are instructive in assessing the roots of the violence, which was attributed to purely economic disputes and ethnic factionalism by some observers.

The most recent demographic information for this district is the 2001 government census. The area was dominated by the Scheduled Tribe (ST) population (51.96 per cent, the majority belonging to the Kandh tribe), with the Scheduled Caste (SC) population constituting 16.89 per cent (the majority were Panas). Christians constituted the largest religious minority, with 18.2 per cent (in contrast to a national average of 2.3 per cent), with Hindus constituting the largest religious grouping (81.4 per cent, approximately equal to the national average). The majority of Christians are Panas, although, in line with Indian law, those listed as Christians are not listed as Scheduled Castes and are ineligible for access to reservations.

The most recent Orissa government statistics show that Kandhamal district is one of the poorest areas of the state.¹⁹ Rural poverty in the area including Kandhamal actually increased marginally in the period from 1983 to 2000. Kandhamal is listed as part of the southern region of Orissa state, in which 87.05 per cent of the population was living in poverty, a figure considerably higher than the state-wide average of 48.01 per cent. Within this southern region, the number of STs (92.42 per cent) and SCs (88.9 per cent) living in poverty were fairly close, with the larger gap being between the SCs and 'others' (77.65 per cent).

The area has a history of tension between the Kandhs and Panas, concerning access to reservations. However, according to the consistent testimony of small NGO leaders from Kandhamal, 'outsider' traders fostered community disharmony between STs and SCs on economic grounds, which were later transmuted into religiously-based grievances by the VHP.

5.2.3. Principal root causes

The violence should not be construed as the product of natural animosity between Hindus and Christians, nor of ethnic tensions, but as the culmination of the systematic propagation of hatred and violence against SC and ST Christians by proponents of 'Hindutva'. Prominent Hindus committed to a secular, multi-faith society in India were among the most vocal of those who strongly condemned the violence on these grounds.

Proponents of 'Hindutva' portrayed the violence in part as a response to alleged conversions by 'force' or 'inducement' carried out by Christians in the region, and Catholic social services for the poor were targeted using this rhetoric. However, evidence has not been adduced in support of these allegations, and many who fled indicated to CSW that they are

¹⁸ "Report of the NCM visit to Orissa, 6-8 January 2008" (<http://ncm.nic.in/pdf/orissa%20report.pdf>).

¹⁹ "Orissa Human Development Report 2004" (<http://orissagov.nic.in/p&c/>).

at least third-generation Christians, not recent converts. Conversely, Christians remaining in or returning to their villages faced coercive conversions to Hinduism, often under the threat of violence.

Although ethnic and economic factors played a role in the violence, these were not the primary causes. It is well-established in social scientific studies on the transmission of Hindu nationalism in rural areas that two of the most successful strategies include the portrayal of Muslims or Christians as a 'threatening other' and the attachment of local issues or grievances to a wider nationalist agenda. Kandhs were co-opted into Hinduism by the VHP with the propagation of Hindu nationalist cultural markers, such as cow slaughter and the threat of Christians. Economic grievances were attached to this wider agenda, with first Pana Christians, then all Christians, represented as the threat. This verdict is reflected in the report of the government-appointed NCM after the December 2007 anti-Christian violence in the region.²⁰

As such, contrary to some interpretations of the violence, it was not an ethnic conflict between the SC and ST communities. Although the majority of the Christians in the area belong to the Pana community, the attacks carried out after the assassination of Saraswati were systematically targeted at Christians in both communities: all deliberate victims of the violence are believed to have been Christians²¹, but included both Pana and Kandh. The relief camps were populated by Christians (and Christian leaders) from both communities; their eyewitness reports consistently recalled the use of Hindu nationalist and anti-Christian slogans to identify the enemy, and unsubstantiated claims were propagated that the Christians were responsible for the killing of Saraswati in order to justify the retributive attacks.

Neither was the violence born primarily out of economic disenfranchisement. Although government statistics show that Kandhamal district is part of a highly impoverished area of Orissa, this poverty simply provided a context for the radicalisation of one community against another. The tensions which existed historically between the Pana and Kandh communities over access to government benefits were co-opted, principally by the VHP, as a basis for the incitement of violence against Christians.

5.2.4. Wider anti-Christian violence

The extent of communal violence following the assassination of Swami Lakhmananda Saraswati was such that it cannot be recorded on an incident-by-incident basis. However, additional attacks are recorded here.

- Budrikiya village, Kandhamal district, 14 February: six Dalit Christian families were threatened with death and forced from their homes by VHP.
- Tiyangia village, Kandhamal district, 16 March: a Palm Sunday procession was prevented by a large Hindu extremist mob from the RSS.
- VIP Rental Colony, Bhubaneswar city, Khordha district, 2 July: pastors Subhanath Digal and Prabir Kumar Singh and five other Christians (Ullas Kumar Pani, Madhusudan Das, Parimohan Surjya, Surendra Digal, and Paul Janardana Bagh) were beaten by Bajrang Dal and then arrested.
- Malicmadi village, Kandhamal district, 8 July: an orphanage, chapel and house were vandalised allegedly by disciples of Swami Lakhmananda Saraswati. Both parties filed counter-complaints.

²⁰ "Report of the NCM visit to Orissa, 6-8 January 2008" (<http://ncm.nic.in/pdf/orissa%20report.pdf>).

²¹ At least one Hindu is known to have died in the violence: this was a young female employee at a Catholic orphanage, who died in the arson attack on that institution.

- Kantapala village, Jajapur district, 20-23 July: two Christians were tonsured and forcibly converted to Hinduism in a ceremony in the presence of a large mob of Bajrang Dal and VHP members. Previously, they had been beaten by a mob after a Sunday service, and also forcibly taken to a police station where they were verbally abused by police. No First Information Report (FIR) was filed at this time, because police had previously refused to file their cases.
- Bhadrak town, Bhadrak district, 26 July: Baloy Kumar Baraik, an employee of a Christian school, was assaulted by a mob and forced to resign from his job. The attackers threatened to burn his family. Baraik lodged a case with the police under sections 341/323/294 and 506 of the IPC, and filed an FIR (no. 188/08). No action is known to have been taken against the attackers.
- Tihidi block, Bhadrak district, 4 November: seven Christian relief workers were beaten, threatened with burning at a local burial ground, and arrested on false charges of 'forcible conversion'. FIRs were registered against the seven under sections 153A and 341 of the IPC. A counter-complaint was filed against the attackers and the workers were released on bail two days later.
- Koraput district (village name unknown), 3 December: three Christians were arrested on false allegations of 'forcible conversion' made by RSS members and charged under sections 147, 148, 254, 307 and 506 of the IPC.

5.3. Karnataka

5.3.1. Summary

Karnataka state, governed by the BJP since May 2008, saw the highest reported rate of anti-Christian attacks after Orissa. Karnataka saw the highest reported level of religiously-motivated anti-Christian violence of any state in 2006 and 2007.

An intense and unprecedented period of attacks on churches and church leaders took place between August and October, with a number of simultaneous assaults on 14 September. These were concentrated largely in coastal Dakshina Kannada district, with smaller numbers of attacks also taking place in Davangare and Udupi districts and Bengaluru (formerly Bangalore). The mob attacks, which targeted a range of Christian denominations, were justified as a reaction to a pamphlet allegedly published by the New Life Fellowship Trust, which was derogatory towards Hindu deities. However, the name of 'New Life', which appeared on the front of the pamphlet, appeared to have been printed separately, and the pamphlet was subsequently traced to a publisher in Andhra Pradesh. New Life Fellowship Trust confirmed that they had not printed the pamphlet.

The attacks, which resulted in a considerable number of injuries, were widely interpreted as having been pre-meditated and coordinated. The coastal area of Karnataka, in which the largest number of these attacks took place, has seen previous communal violence and is reputed as an area in which Hindu nationalist organisations have been active for over fifteen years in propagating the 'Hindutva' agenda and attaching communal significance to local economic grievances.

Police responses to the violence were criticised for a clear anti-Christian bias in their disproportionate heavy-handedness in dealing with Christian protestors. The criticisms, echoed in sections of the English-language Indian press, centred largely around police violence against Christians and their property and the incongruity of charging Christians under non-bailable sections of the law for protesting the violence, whereas Mahendra Kumar, the state convener of the Bajrang Dal (the organisation which was widely accused of the incitement of violence) received bail within several days. Similarly, police were criticised for taking no action in response to complaints lodged against a Kannada-language daily for allegedly defending the anti-Christian attacks. The police responses also included attempts

to close down buildings used for Christian worship or requiring personal details of attendees; however, the Karnataka High Court ruled in December 2008 and January 2009 that house churches must be permitted to hold worship services.

A NCM team visited Karnataka in September and its subsequent report concluded that the attacks that month appeared to be "well planned" and criticised both the government for failing to take preventative measures following violence in August, and the degree of force used by police against Christians protesting the attacks, which was "certainly not commensurate with the requirement of the situation".²²

Many of the attacks throughout the year were perpetrated in connection with unsubstantiated accusations of 'forcible conversions', and the alleged assailants represented a range of different groups within the Sangh Parivar, including the Bajrang Dal, BJP, Hindu Jagrana Vedike, Karnataka Rakshana Vedike, Ram Sena, RSS, Shiv Sena and VHP.

In addition to the incidents reported below, CSW also received information of 57 attacks whose details could not be confirmed; of these, 30 took place during September.

5.3.2. Confirmed incidents

- Ullal town, Dakshina Kannada district, 17 January: Christian woman attacked by Bajrang Dal extremists.

A group of Bajrang Dal members attacked Baswamma Sangappa, apparently in retribution for converting to Christianity. Sangappa was making a telephone call in a local shop, when the shop owner overheard her conversation and asked her name and whether she was a Hindu. Baswamma told him that she had converted to Christianity fifteen years previously. The shop owner told a few people present about her conversation, and a group of extremists proceeded to assault her. When police arrived at the scene, they also beat her with their batons and took her to the police station. Sangappa was released when MLA, U.T. Khader intervened. Superintendent of Police, N. Satish Kumar ordered an inquiry into the incident, but no arrests were known to have been made.

- Bengaluru, 24 August: celebrated Christian charity founder assaulted by RSS in police station.

A Christian known popularly as 'Auto Raja', who founded the New Ark Mission of India Home of Hope, a home for the destitute in the outskirts of Bengaluru and who has received widespread recognition for his work from politicians and the press, was assaulted and detained in a police station. Police had regularly brought people from the streets to his Home of Hope, and he enjoyed a good local reputation. On 24 August, he had been telephoned by friends being held by police, after they had been praying in a slum area. When he arrived, several RSS men identified him as their leader; they physically assaulted him in the police station and attempted to force him to make a confession to television cameras from local station, TV9. He refused, protesting that he had done nothing wrong. The police circle inspector also slapped him across his face, threatened to shoot him and said that his face should be posted publicly as a criminal. He was imprisoned for three days under sections 290, 295, 341 and 506 of the IPC. TV9 carried interviews from one RSS member, alleging that he had offered her Rs. 1,000 to remove her pictures of Hindu deities and replace them with pictures of Jesus. Another influential RSS man named as Shri Dhar, whom 'Auto Raja' claimed never to have met, alleged that the latter had attempted

²² "Visit of NCM Team to Karnataka (Mangalore, Udipi & Bengaluru), 16th to 18th September 2008" (<http://ncm.nic.in/doc/NCM%20Karnataka.doc>).

to convert him. Other RSS cadres reportedly accused him of converting those in his care, and killing them with injections. 'Auto Raja' denied all these allegations.

- Shiroor area, Niragadh, Udupi district, 14 September: pastor attacked with machete; other Christians beaten and vehicle burnt.

A mob of 25 Hindu extremists forced entry into the Life and Light Ministries Prayer Hall, assaulted the pastor with a machete, struck some members of the congregation, torched a car and damaged the windows and furniture. The case was registered under sections 143, 147, 149, 295, 324, 427, 448, 506 of the IPC and five arrests were made.

- Davanagere district (village name unknown), 15 January: a church was vandalised by suspected Hindu extremists, resulting in a 65-year-old lady being injured. A complaint was filed with the police.
- Bengaluru, 17 January: Christians protesting against the Christmas 2007 Kandhamal violence were attacked by Hindu extremists. Police dispersed the crowd, filed FIRs on behalf of the Christians and arrested some of the attackers.
- Hegganahalli village, Bengaluru Rural, 3 February: house church members were attacked by twenty VHP and RSS members, and forced to pray to Hindu gods. Police action remains unknown.
- Bengaluru, 14 March: a Christian event was attacked by Karnataka Rakshana Vedike extremists and Christian attendees were beaten. Twenty arrests were made.
- Byapanahalli village, Bengaluru, 23 March: Pastor P. Isaac and nine other Christians were attacked by extremists led by a Hindu priest. A seventeen-year-old girl required hospital treatment after the attacks. The pastor was interrogated by police. A 'compromise' was reached between parties, whereby the pastor was required to move out of the area.
- Guddekoppa village, Shimoga district, 23 March: a group of Christians were attacked by Hindu extremists during an Easter Sunday service. Police provided protection for the pastor following the attack and six assailants were arrested.
- Guddekoppa village, Shimoga district, 8 April: Hindu extremists harassed Raghuram Shetty, who was hosting a Christian meeting, and filed complaints of 'forcible conversion' against him. Shetty was detained and cautioned by police.
- Moodalpalya village, Bangalore district, 24 June: Hindu extremists associated with the Sangh Parivar assaulted Pastor Murugan and two other Christians of Gospel Church. The pastor was then arrested by local police.
- Davangere district (village name unknown), 20 July: a pastor and another Christian were severely beaten by members of the VHP, Ram Sena and RSS, and then arrested by police.
- Davangere district (village name unknown), 20 July: a Christian was forced into hiding following an attempted attack, allegedly by Sangh Parivar extremists. A complaint was filed and one person was arrested.
- Ankoal village, Karwar district, 27 July: Pastor Anand Huva Naik was assaulted by a group of around twenty Hindu extremists, who forced their way into the pastor's house and disrupted a Sunday worship service. They then filed a case under sections 323, 504, 506 & 270 of the IPC, and the pastor was jailed for two days.
- Bagalkot district (village name unknown), 27 July: Pastor Basappa Durgappa and five other Christians were attacked by around 40 Hindu extremists, who forcibly entered a Sunday worship service in a rented room of Hotel Anugraha. They slapped and kicked the pastor repeatedly, destroyed about 100 Bibles, and seriously injured the pastor's wife and four children under 16 years of age. No case was registered by either party.

- Turuvekere village, Tumkur district, 31 July: Bajrang Dal members attacked Christians meeting in the home of Mr Ramakrishna. The Christians were then forcibly taken to the local police station, and verbally and physically assaulted by Police Sub-Inspector Krishnaraja.
- Tumkur district (village name unknown), 1 August: three pastors were arrested and falsely charged with 'forcible conversion'; they were released on bail after three days.
- Frazer town, Bangalore district, 1 August: eight Christians were arrested on charges of forcible conversion, but were later released on bail.
- Davangere district (village name unknown), 10 August: a church was attacked by 200 Bajrang Dal members. Fifteen Christians were injured and six people were arrested in connection with the attack.
- Harapanahalli village, Davangere district, 10 August: two pastors were stripped and tied to a car by Hindu extremists for evangelising in the area. No FIR was filed.
- Davangere town, Davangere district, 12 August: youth from Hindu Jagrana Vedike and Shiv Sena stoned a pastor's house and threatened all local pastors. Police detained the Christians to protect them.
- Davangere city, Davangere district, 17 August: The Divine Healing Church was attacked by around 50 Bajrang Dal members. Bibles and hymn books were burnt and Christians were beaten. No arrests were made.
- Davangere city, Davangere district, 24 August: Nitya Jeeva Devalaya church was attacked by around 60 Bajrang Dal members, who beat the Christians. No complaint was filed.
- Uchangidurga village, Davangere district, 27 August: a church was attacked by Ram Sena members and three people were injured. The case was registered under section 295 and 298 of the IPC.
- Davangere district (village name unknown), 4 September: four churches were locked and sealed by Municipal Authorities and a license to worship was demanded from them despite local lawyers claiming there is no provision for such a license.
- Bada village, Davangere district, 7 September: a church was attacked by a mob of approximately 300 from extremist group, Hindu Jagarana Vedike. The case was registered under sections 295 and 298 of the IPC, and ten attackers were arrested.
- Goruguntapalaya, Bengaluru, 14 September: a mob of around 30 Hindu extremists with bricks and sticks and accompanied by police invaded a service, broke the equipment and tried to force the pastor to give up the church key. An FIR was filed by the pastor, but no arrests were known to have been made.
- Chikkakadiganahalli village, Kolar district, 14 September: a church was damaged, allegedly by Hindu extremists.
- Singatagere village, Chikmagalore district, 14 September: Kallesh, a Christian was stripped of his clothes, and a church was damaged, allegedly by Hindu extremists.
- Chikmagalore town, Chikmagalore district, 14 September: a church was vandalised by VHP members.
- Chikmagalore district (village name unknown), 14 September: the Kingdom Hall church was attacked by Bajrang Dal members. A pregnant woman was kicked and required hospital treatment. No arrests were known to have been made.
- Jayapura village, Chikmagalore district, 14 September: nine Christians were attacked with wooden clubs, cycle chains and swords by Bajrang Dal members, and the End Time Full Gospel Church was damaged. No arrests were made.
- Mangalore, 14 September: the Roman Catholic Adoration Chapel was attacked and vandalised by Hindu extremists. Justice M.F. Saldanha (retired) investigated the attack. Police response is unknown.

- Mangalore, Dakshina Kannada district, 14 September: a church and a policeman were attacked, and seven Christians were injured. Four of the attackers were arrested.
- Mangalore, Dakshina Kannada district, 14 September: a prayer centre was attacked by around 30 Hindu extremists and the pastor was beaten. A case was registered under sections 34, 143, 147, 148, 324 and 427 of the IPC.
- Bilinele village, Dakshina Kannada district, 14 September: a prayer centre was attacked and Christians were assaulted. Nine people were arrested in connection with the attack.
- Mangalore, Dakshina Kannada district, 14 September: a church was vandalised and the PA system was destroyed by a group of around fifteen Hindu extremists. Four people were arrested in connection with the attack.
- Bannur village, Dakshina Kannada district, 14 September: a church was damaged by Hindu extremists. The case was registered under sections 143, 147, 148, 427 and 149 of the IPC.
- Kalanja village, Dakshina Kannada district, 14 September: a church was attacked and four people were injured. Nine arrests were made in connection with the attack.
- Mangalore, Dakshina Kannada district, 14 September: a church and a statue were damaged by suspected Hindu extremists. The case was registered under sections 143, 147, 148, 149, 427 of the IPC.
- Udupi district (village name unknown), 14 September: a New Life Fellowship Hall was attacked, a child was hospitalised and other Christians were injured by a Bajrang Dal mob numbering an estimated 40-50 people.
- In Mudur village, Udupi district, 14 September: a group attacked Mission One Million Life Centre and physically harassed one person and damaged furniture, a television set, and the telephone. Five arrests were made.
- Koteswar village, Udupi district, 14 September: a church was attacked and Christians were beaten. Two people were arrested in connection with the attack.
- Chikmagalore town, Chikmagalore district, 14 September: Ebenezer Prayer Hall was vandalized by around 25 VHP workers who damaged the church furniture. An FIR was filed.
- Chikballapur village, Chikballapur district, 14 September: St. Thomas Church (Church of South India) was vandalized by suspected Hindu extremists.
- Ganjimatta town, Dakshina Kannada, 15 September: a church was damaged in an attack. No arrests were known to have been made.
- Mangalore, Dakshina Kannada district, 15 September: a Capuchin Church was stoned by Hindu extremists. A case was registered, under sections 153(a) and 427 of the IPC.
- Bantval town, Dakshina Kannada, 15 September: a church was set on fire, despite the presence of a police guard. No arrests were known to have been made.
- Kolar town, Kolar district, 16 September: a statue of the Virgin Mary was stoned outside a church by Bajrang Dal members. No arrests were known to have been made.
- Ernody village, Dakshina Kannada district, 16 September: St George Church was vandalised, and an arson attack was attempted. Two arrests were made and the case was registered under sections 457, 295 and 448 IPC.
- Adyar village, Dakshina Kannada district, 16 September: the Rima Worship Centre was attacked.
- Bantval town, Dakshina Kannada district, 18 September: a church was stoned resulting in the windows being broken.
- Dharwad district (village name unknown), 18 September: a statue of Mary was damaged by Hindu extremists. The case was registered under section 295 of the IPC.

- Padu Kody village, Dakshina Kannada district, 19 September: a church was stoned, allegedly by Hindu extremists. A case was registered under sections 143, 144, 149, 295 and 427 of the IPC.
- Sagar town, Shimoga district, 19 September: sandals were placed around the neck of a statue of Jesus which was perceived as a serious insult. A case was registered under sections 143, 144, 149, 295 and 427 of the IPC, and three arrests were made.
- Mariyannapalya, Bengaluru district, 21 September: a Catholic church was ransacked. A case was registered under sections 144, 149, 333 and 448 of the IPC, and seven people were arrested.
- Rajarajeshwarinagar area, Bengaluru district, 21 September: a statue of Jesus as an infant was damaged and a case was registered under sections 144, 149, 333, and 448 of the IPC. No arrests were known to have been made.
- Nellihudikeri town, Kodagu district, 21 September: church windows were broken by unknown attackers.
- Yedapadavu village, Dakshina Kannada district, 21 September: a seminary was stoned by suspected Hindu extremists.
- Shamboor village, Dakshina Kannada district, 26 September: Sacred Heart church was vandalised and Bibles and Christians song books were burnt, allegedly by Hindu extremists. An FIR was filed.
- Yelahanka village, Bangalore district, 26 September: twenty Bajrang Dal members vandalised the Peace Prayer Hall, broke musical instruments and burnt a Bible. An FIR was filed, but no further action is known to have been taken by police.
- Anagalpura village, Bangalore district, 29 September: Rs. 10,000 and electronic items were stolen from St Anthony's Church by unknown assailants.
- Kanaji village, Bidar district, 5 October: Immanuel Full Gospel Church was burnt by Hindu extremists. A complaint was lodged by the police, the pastor was reportedly forced to give a false statement, citing the attack as an accident, and the case was closed.
- Yadavanahalli village, Bengaluru district, 13 October: St Anthony's Church was set on fire. A case was filed under sections 448 and 436 of the IPC. Police blamed the fire on an electrical problem, but this was questioned by the members of the church. The state government ordered a Corps of Detectives probe into the matter.
- Mangalore, Dakshina Kannada district, 14 October: Christians were arrested and beaten by police following a peaceful protest. A complaint was registered with the chief constable.
- Bellary town, Bellary district, 25 October: Dr Suresh and five other Christians were accused of 'forcible conversions' by Hindu extremists, who brought journalists with them. A pastor, Ratna Kumar, stopped the attack with the support of local Dalit leaders. No case was registered.
- Belgaum, 26 October: Teluga Brethren Christian Assemblies Church was damaged. A complaint was submitted to police, but no FIR was filed.
- Thimannakatte village, Haveri district, 2 November: police disrupted a Dheiwah Ministry meeting following false reports of 'forcible conversions'. The pastor was told by police to request permission before holding meetings in future.
- Bagalkot town, Bagalkot district, 2 November: Shalom Full Gospel Church was informed by police to request permission before conducting meetings in future.
- Banavara village, Hassan district, 9 November: Pastor Ravi Charles was beaten and falsely accused by VHP members. Police detained Charles and several other Christians but released them soon afterwards.
- Cox town, Bengaluru, 12 November: three Christians, named as Mr Chandrashekar, Ms Sandhya and Ms Kamamma, were arrested on false charges and are believed to have been remanded in police custody until 28 November. An FIR was filed under sections 295A and 298 of the IPC.

- Bengaluru, 16 November: a pastor and another Christian were beaten and then arrested following a false complaint of 'forcible conversion' by RSS and VHP members. An FIR was filed against the Christians under sections 295A and 506 of the IPC.
- Bajpe Antonikatte, Mangalore, Dakshina Kannada district, 20 November: St Antony Chapel was stoned by Hindu extremists.
- Arakulugudu city, Hassan district, 20 November: false allegations were made about Morarji Desai Minority Community School Hostel Assistant (Ms Bhagha) of 'forcible conversion'; she was questioned by police, then released.
- Davanagere city, Davanagere district, 26 November: Pastor Vantakesh Nayak was accused of forcible conversion and beaten by Hindu extremists. He was taken to Honnali police station, where he was released and the case was closed.
- Ibrahim Pura village, Bellary district, 8 December: the Rev. N. Satyam and another Christian were attacked and falsely accused of 'forcible conversion'. They were detained by the police, who refused to take action against the attackers, and were later released.
- Bangarapet village, Kolar district, 14 December: RSS and Bajrang Dal members attacked a Christian function and falsely accused Pastor Sam Moses of 'forcible conversion'. He was dragged to the police station and detained, but police found the allegations to be untrue and Pastor Moses was released.

5.4. Andhra Pradesh

5.4.1. Summary

Andhra Pradesh state saw a similar number of reported anti-Christian attacks in 2008 to previous years, including several arson attacks on churches and numerous physical assaults.²³ Retribution for alleged 'forcible conversions' was the motivation for many assaults. Police responses were typically less hostile towards the minority Christian community than in some other states, although impunity was the norm.

5.4.2. Confirmed incidents

- Peddareddy village, Nizamabad district 17 February: pastor beaten and threatened with death over alleged conversions; police refused to file case.

Pastor P. Vijay was attacked on his way to church by Bestha Gangaram, a local shopkeeper, who approached him on a bicycle and began to beat him. Pastor Vijay fell to the ground; Gangaram then held him up by his collar as others joined in the attack. The attackers threatened to kill Pastor Vijay if he continued to convert people. He was later admitted to the hospital for treatment. Pastor Vijay went to the local police station to file a complaint. Bestha Gangaram was called to the police station, but released with a warning. The police allegedly refused to file any FIR against the attackers.

- Miryalguda town, Nalgonda district, 29 July: Christian students attacked and literature burnt.

²³ Several additional reports of similar incidents in Andhra Pradesh were received, but their details could not be confirmed. CSW also reported and called for police investigation into the murder of Catholic priest Fr Thomas Pandippallyil on 16 August, which local sources suspected was religiously-motivated on several grounds: the brutality of the murder and the priest's involvement in a local Catholic school which had attracted opposition from extremist Hindu nationalists suggested it was a hate crime, and the fact that his motorcycle was found abandoned suggests that the murder was unlikely to have been a robbery. However, the subsequent police investigation found that the murder was in fact most likely to have been a violent robbery rather than a religious hate crime.

Three 'Hindutva' activists arrived on a school campus and attacked two female students who were distributing Christian literature. They took all the Christian literature and burnt it in a nearby ditch. They also pelted local Christian houses with stones. The activists lodged a complaint with the police alleging that the Christian students were using the literature to convert college students. Local Christian leaders also registered a complaint against the attackers. Both parties reached a compromise and the police verbally assured the Christians of protection against such incidents in future.

- Hyderabad, 6 January: a Christian preacher was assaulted by BJP members who filed a false complaint against the pastor for alleged 'forcible conversions'.
- Narasingpalli village, Nizamabad district, 9 January: a suspected arson attack was carried out on a church, by Hindu extremists. A complaint was lodged at the local police station, and the case was investigated. No further action was known to have been taken.
- Tandur town, Rangareddi district, 13 January: an arson attack was carried out on a church, allegedly by Hindu extremists.
- Kakinada town, East Godavari district, 15 January: a pastor was attacked by a mob of Hindu extremists. The pastor was detained by police, but no action was known to have been taken against the attackers.
- Bhudhan Pochampalli village, Nalgonda district, 15 January: an arson attack was carried out on a church by unidentified assailants. A complaint was filed, but the church decided not to pursue the case.
- Kurabalakota village, Chittoor district, 23 February: Christian evangelists were attacked by RSS and BJP members, then detained by police.
- Devarakonda village, Nalgonda district, 15 April: extremists beat and stoned pastors John Kumar and Nathan Mark, apparently in retribution for distributing Christian literature. An FIR was filed, and two assailants were arrested, charged, then released on bail on the same day.
- Bhainsa town, Adilabad district, 23 May: approximately twenty preachers were beaten by RSS extremists. The attack was stopped by police, who chased the extremists away, and escorted the Christians to the police station to file a complaint.
- Khanapur village, Adilabad district, 26 May: a group, allegedly belonging to the RSS, demolished a church building and accused Pastor Yesu Das of 'forcible conversions'. A police report was not filed, as the pastor did not wish to pursue the case.
- L.B. Nagar, Hyderabad district, 12 June: RSS members attacked Pastor Peter Mohan and his non-Christian friend, Ramesh Babu.
- Amberpet, Hyderabad district, 15 June: a church was burnt by unknown assailants. A police complaint was filed by Pastor Majji Yeshurathnam. No known action was taken.
- Rangadam Palli village, Medak district, 22 June: a pastor, his wife and another Christian were beaten; all three required hospital treatment. A complaint was registered with the police but no arrests were known to have been made.
- Dandu Mylavaram, Rangareddi district, 10 July: a pastor was assaulted and threatened by members of VHP. A complaint was filed and a compromise was reached between the parties, which involved the pastor being asked by the Municipal Office to leave the area.
- Janagaon village, Warangal district, 27 July: a pastor and a Christian media team were attacked and their equipment was destroyed by 30 alleged members of BJP, VHP and Bajrang Dal. A complaint was filed, but was withdrawn once a compromise was reached.

- Ghatkeswar village, Rangareddi district, 7 August: a church and a school were attacked by 400 Hindu extremists, who then built a temporary temple. Police officials intervened and the attackers left the area.
- Uppal Hills, Hyderabad district, 17 August: a church building was destroyed by RSS members. The pastor filed a complaint but was forced to withdraw it. He continued to face harassment, but was unable to register a new complaint.
- Ayodhya Nagar village, Chittoor district, 7 September: a pastor and other Christians were beaten, falsely accused and driven away from a prayer meeting by VHP members. The following day, they were threatened with a bomb attack. Counter-complaints were filed, but no action was known to have been taken against either party.
- Mandanapally village, Chittoor district, 12 October: VHP extremists disrupted a Krupa Prayer House meeting and threatened to build a Hindu temple on church land. A compromise was reached when police agreed to set aside land for the Hindu temple elsewhere.
- Kamareddygudem village, Nalgonda district, 14 October: an Operation Mobilisation media team was attacked by Hindu extremists and their equipment was destroyed. Complaints were filed against the attackers and the Christians. Both parties were charged and released.
- Devarakonda village, Hyderabad district, 25 November: a Christian film team was attacked by VHP members. Four Christians were arrested under section 295A of the IPC, and were later released on bail.
- Ramnagar village, Hyderabad district, 23 December: several Christians were attacked by RSS members, and required hospital treatment. An FIR was registered, and three attackers were arrested.

5.5. Madhya Pradesh

5.5.1. Summary

Madhya Pradesh state continued to see some of the most severe anti-Christian violence occurring consistently through the year, most of which involved physical assaults. Numerous attacks were perpetrated in connection with unsubstantiated allegations of 'forcible conversions', reflecting the continuing perception of conversions as illegitimate, but there were no convictions under the state 'anti-conversion law'. Police responses were varied in their effectiveness, ranging from the arrest of assailants to evidence of severe negligence. Impunity was the norm.

The reporting of anti-Christian violence in Madhya Pradesh is very limited, and there are compelling reasons to believe that the rate of violence is considerably higher than recorded here.²⁴

5.5.2. Confirmed incidents

- Pathigaon village, Rewa district, 17 January: two Christians kidnapped and severely beaten by Bajrang Dal extremists.

Six alleged Bajrang Dal extremists stormed a house church, abducted two Christians and severely beat them. They arrived on three motorbikes, carrying saffron coloured flags, wielding swords, knives, tridents and sticks and shouting Hindu religious slogans. They accused the Christians of 'conversions'. The attackers were named as Yedupati Prasad Mishra, Hari Shankar Mishra, Ravindra Kumar Mishra, Gangadhar Singh, Yogender Mishra, and were reportedly led by local Bajrang Dal leader A.P. Sakhi.

²⁴ Several additional reports of similar incidents in Madhya Pradesh were received, but their details could not be confirmed.

The Bajrang Dal attackers tried to take GEMS workers, Vijaya Kumar Maurya and Keera Lal to the police station. Other Christians offered to accompany Maury and Lal to the police station which prompted the attackers to begin beating Maury and Lal and to take them to a forested area for further beatings. Four of the assailants took Maury and Lal to a temple on a hill, known as Sahaki Pahar, where they threatened to sacrifice them to the 'god of the temple'. The assailants then received a telephone call, warning them that a police complaint had been lodged against them. The assailants returned the mobile phones they had confiscated from the Christians, forced them to call the police and sign a paper indicating that they had not been kidnapped, and released them. Maurya sustained head and stomach injuries and Lal was left with severe back pain.

The attackers tried to file a complaint, contending that the Christians had kidnapped two of their people. Superintendent of Police, Mohammed Shahid Absar, said that the police were investigating but no formal complaints had been made by the assailants or the Christians.

- Katni district (village name unknown), 3 July: Christian social worker arrested and falsely charged, while colleagues beaten.

David Vinayagam, who ran a children's home, was questioned and the home was searched without a warrant, before he was arrested for alleged 'forcible conversions'. His colleagues were also detained and beaten by police, but were not charged. Police forcibly transferred all 26 children from the home to a government-run home, although it did not have sufficient capacity for them. BJP and RSS cadre visited the children, and urged them to testify against Vinayagam. The children were returned to their original children's home three days later, and David was granted bail the next day.

- Narsimhapur district (village name unknown), 14 February: Christians were attacked by a large Hindu extremist mob, while supposedly under police protection. A case was registered against the attackers under sections 146, 147, 294, 325B and 506 of the IPC. No arrests were known to have been made.
- Kosmi village, Balaghat district, 22 February: two Christians were attacked by Bajrang Dal members during a church meeting, sustaining internal injuries, before being taken to a police station, accused of 'forcible conversions'. No arrests were known to have been made.
- Indore town, Indore district, 24 February: a church was vandalised by a large mob of RSS extremists. Seventeen people were arrested in connection with the attack.
- Balaghat district (village name unknown), 27 February: the President of Balaghat Christian Association was beaten by Bajrang Dal extremists. A case was filed but no arrests were known to have been made.
- Maksi town, Shajapur district, 10 March: a pastor was severely beaten and abducted by RSS extremists. He was held by police for several days on false charges of 'forcible conversion'. No FIR was filed.
- Raoti village, Mandasaur district, 28 March: four pastors were attacked by RSS and Shiv Sena extremists, and charged under the Madhya Pradesh Freedom of Religion Act.
- Indore city, Indore district, 5 April: extremists harassed two nuns, Sr Kusum and Sr Marina, and accused them of 'forcible conversions'. Police were harassed by the mob when they refused to file an FIR against the nuns.
- Jabalpur district (village name unknown), 18 April: Dharam Sena extremists threatened a widow and her two-year-old daughter with burning if they carried out a Christian burial. The police restored order, and the burial went ahead.
- Gondarmug village, Bhopal district, 15 May: unidentified assailants vandalised the Novitiate of the Presentation Sisters, and harassed the nuns. A complaint was filed,

and the police arrested thirteen people under sections 147, 452, 426 and 502 of the IPC.

- Kharra Nivi village, Rewa district, 27 May: Bajrang Dal members attacked a Christian, named Shankarlal Saket, who sustained injuries which required twenty stitches.
- Chungi Nagar, Gurh Tehsil sub district, Rewa district, 15 June: Pastor Rampal Masih of the Believers Church was beaten by Bajrang Dal extremists in front of the police. A false complaint of 'forcible conversions' was registered against him, and he was threatened with arrest if he should continue his Christian activities.
- Jabalpur district (village name unknown), 4 August: a pastor was falsely charged with 'forcible conversions' and was detained, with his wife, under section 296A of the IPC and section 4 of the Madhya Pradesh Freedom of Religion Act. They were released on bail two days later.
- Ratlam district (village name unknown), 15 August: several Christians from various organisations were beaten by members of Bajrang Dal. Three Christians, identified as N.T. Murti, Pastor Satyanarayana, and his wife, Latha, were detained by police and charged with 'forcible conversions' before being released on bail.
- Gwalior district (village name unknown), 29 August: four schools were targeted with verbal abuse and vandalism by members of VHP and Bajrang Dal, although damage was limited by a fast police response, and the attacks were investigated. The outcome of the investigations is unknown.
- Ratlam district (village name unknown), 7 September: a church was burnt by alleged members of the Bajrang Dal and VHP. A case was filed under sections 295 and 463 of the IPC.
- Indore city, Indore district, 13 September: a church was set on fire allegedly by Hindu extremists. An FIR was filed.
- Banduha village, Ujjain district, 16 September: a convent watchman was shot with an airgun. An FIR was filed, and the security provided to this and other institutions was increased.
- Pentinaka, Sadar, Jabalpur district, 18 September: St Peter and Paul Cathedral was set on fire by Dharam Sena members. An FIR was filed, and the police conducted an investigation, but no arrests were known to have been made.
- Tikamgarh district (village name unknown), 22 October: an arson attack was carried out on a Catholic church. Police helped to extinguish the fire, and an FIR was lodged.

5.6. Chhattisgarh

5.6.1. Summary

Chhattisgarh state saw some of the most egregious incidents of anti-Christian violence of the year, although weak reporting mechanisms suggest that the rate of violence may be considerably higher than what is recorded here.²⁵ The Dharam Sena, the group most commonly named in connection with anti-Christian violence in the state, continues to be accused of leading or inciting the majority of attacks. Police responses to the violence were often very poor, with evidence of severe negligence. Impunity was the norm.

5.6.2. Confirmed incidents

- Dhamtari district (village name unknown), 17 January: missionary health camp attacked by Dharam Sena extremists.

²⁵ Five additional reports of similar incidents in Chhattisgarh were received, but their details could not be confirmed.

Over 200 Dharam Sena extremists attacked a missionary health camp, accusing the Christians and attendees of participating in a 'conversion ceremony'. At least a dozen people were seriously injured. The extremists also set fire to vehicles and other equipment at the camp. The Dharam Sena state unit chief, Kishore Kothari, denied their involvement. The Inspector General of Raipur, Y.K.S. Thakur, stated that one arrest had been made and that the accused were being questioned.

- Bastar district (village name unknown), 9 January: a small Christians praying with a Hindu villager in a private home, were physically assaulted by around 25 Dharam Sena extremists, and six Christians were arrested under section 295A of the IPC.
- Kunkuri sub-district, Jashpur district (village name unknown), 13 January: a newly-converted Christian was forcibly taken to the police station by Hindu Jagran Manch members. Police refused to register a complaint against the Christian for converting others, although he was detained for a few hours.
- Bothli village, Durg district, 16 January: a large Christian meeting was attacked by Dharam Sena extremists, resulting in injuries to around 80 participants. One Christian was detained by police and one attacker was known to have been arrested. On the day after the incident, a Dharam Sena leader reportedly made a statement on television news channel E-TV, threatening Christians with further attacks if meetings were held in the area again.
- Oriya Para, Raipur Nagar, Durg district, 1 June: a church was vandalised by Hindu extremists and Christians were threatened. An FIR was lodged under sections 295, 147 and 323 of the IPC.
- Durg district, 5 September: four nuns from the Missionaries of Charity were assaulted by Bajrang Dal and VHP members, while on a train with four infants. They were dragged off the train and taken to Mohan Nagar Thana police station. An ambulance was sent to them, but surrounded by a mob which attacked the driver and one nun. They were vilified by false accusations of human trafficking, but the documentation of the children proved that all was in order. No FIR was filed.

5.7. Other states and territories

5.7.1. Summary

Incidents of religiously-motivated violence were reported in numerous other states throughout the year, of which those that could be verified are recorded here. Tamil Nadu has seen an increase in the number of reported incidents, usually targeting Christian property, but CSW was unable to verify details of the majority of these. Uttarakhand has also seen a rise in the rate of reported violence, but some of the incidents could not be verified. Few anti-Christian attacks were reported in Gujarat following persistent successful litigation, but minorities report facing harassment and discrimination of a different nature.

5.7.2. Confirmed incidents

- Jind district (village name unknown), Haryana, 1 January: Seven Christians were beaten by a Bajrang Dal mob numbering around 100. The attackers tried to file a complaint of 'forcible conversions', but the police refused to accept it.
- Tharamangalam town, Salem district, Tamil Nadu, 18 January: a Dalit Christian family was attacked by Hindu extremists. While Pastor Abraham, one of the victims, was reporting the attack to the police, other church members arrived at the house for a meeting and were also attacked. The police registered the case and made four arrests.
- Dilshad Garden area, Delhi, 24 February: St Sebastian Catholic church was stoned by Bajrang Dal extremists. A case was registered under section 427 of the IPC.

- Rampur, Himachal Pradesh, 25-28 February: over 60 Christian families were forcibly 're-converted' to Hinduism by VHP, RSS and Seva Bharati members, after having been brought to Rampur under pressure from local villagers. Pastor Ram Lal Kanol was reportedly offered a bribe of Rs. 15,000 to become a Hindu and preach Hinduism, but when he refused, he was coerced into converting under threat of death or imprisonment if he should continue preaching Christianity. No FIR was filed.
- Kalyanpuri area, New Delhi, 28 February: Peter Banarjee, a Christian charity worker, was attacked by BJP supporters while he tried to seek protection at Kalyanpuri police station, and was accused of conversions by 'allurement'. Police sent Banarjee to a room overnight for his protection. No FIR was filed.
- Chennai town, Chennai district, Tamil Nadu, 9 March: a pastor was attacked by Hindu extremists on a train.
- Alibaug, Raigarh district, Maharashtra, 15 March: around 50 Hindu extremists assaulted a group of Saint Teresa Sisters and tribal women celebrating International Women's Day. Sr Mercy Tuscano and Sr Philomena D'Mella were kicked in the genital area, dragged along and thrown onto a barbed wire fence. The police eventually filed trivial charges after intervention from the Catholic Forum. One of the attackers, Vaishali Patel, was detained in the Alibaug prison.
- Joadmoha village, Yavatmal district, Maharashtra, 13 May: a Hindu extremist mob beat a Christian. An FIR was filed under sections 502 and 505 of the IPC.
- Shahabad Dairy, Rohini, Delhi, 5 July: Christians, including women and children, were beaten, punched and slapped by Hindu extremists who were led by Pandit Dhanlal Diweli during a prayer meeting. Action was taken against both parties under section 107/50 of the Criminal Procedure Code.
- Hamirpura village, Barmer district, Rajasthan, 21 July: Pastor Laxman Mina and five Christians were detained by police following false allegations by RSS of vandalism against a temple idol. The police initially refused to act, but following the extremists threats to take things into their own hands, the Christians were detained. All were released in the following two days.
- Shaym Puran village, Udham Singh Nagar district, Uttarakhand, 2 August: Pastor Jagdish and around 30 other Christians were attacked by 25 activists from Shiv Sena led by Ashwani Sharma and Chandana. Two Christians required hospital treatment. The police initially refused to investigate, but finally filed an FIR in October after the Christians approached the NCM in Delhi.
- Jamblipada village, Thane district, Maharashtra, 21 August: a Christian (Kashinath Kadale) was beaten and hung by seven Hindu extremists. The police reported that Kadale and his wife had been drunk and had abused the seven people, but had only taken a statement from the attackers.
- Jaipur district, Rajasthan, 14 September: St Xavier's School was attacked and the teachers were threatened. The attack stopped when the police arrived but it resumed as soon as they had departed. The police were subsequently stationed at the school for two days and attacks stopped.
- Kottakkani village, Kasargod district, Kerala, 14 September: Jaya Mata Convent School was attacked by Hindu extremists, windows were smashed and a figure of Mary was damaged. The state interior minister, Kodayeri Balakrishnan, gave an assurance that there would be an investigation.
- Govindnagar village, Kanpur district, Uttar Pradesh, 14 September: eight Bajrang Dal members led by Baburam Vajpayee beat and harassed Christians outside their home, then took four of them to the police station. The situation escalated, after associates of a pastor who tried to assist, were assaulted by a mob. They were taken to a police station, where a large mob had gathered, threatening to burn the pastors and their churches, and to create an "Orissa here". The assistant district

collector intervened, and the Christians were escorted home, but the pastor was told to cease his Christian work. The pastor filed a complaint, and the extremists filed a counter-complaint of 'forcible conversion'. The outcome of the case is unknown.

- Trilokpuri, Dehli, 17 September: a mob of Hindu extremists believed to be affiliated with the RSS and Bajrang Dal, forcibly entered the area in front of God's Light Church, breaking the gate and church doors, and threatened to build a Hindu temple on the site. Police stopped the mob from entering the church.
- Dehra Dun, Uttar Pradesh, 21 September: Fr Samuel was found strangled, with his hands tied together, and his room appeared ransacked. Previously, he had been harassed by the VHP, and the murder was alleged to be the work of the VHP. Police investigated, but the outcome of the case is unknown.
- Gonda district, Uttar Pradesh, 21 September: Pastor Sunil Rana was arrested after an anonymous tip that he was involved in 'forcible conversion activities'. Police arrested him from the Believers Church, and he was charged before being released on bail on 23 September.
- Albert Chowk, Ranchi city, Jharkhand, 23 September: an effigy of Cardinal Toppo and Bibles were burnt, allegedly by Sarna Tribals, who were incited by members of RSS and Bajrang Dal. The police investigated, but the outcome of the case is unknown.
- Jamshedpur city, Purbi Singhbhum district, Jharkhand, 24 September: St Mary's Church in Bistupur was desecrated and vandalised allegedly by RSS and Bajrang Dal members. Police noted the vandalism, but no action was taken.
- Baradabari, Uttar Pradesh, 2 October: VHP lodged a complaint of 'forcible conversion' against the Alliance Ministry's Life Church. The pastor was told to stop meetings, as the VHP had threatened to attack.
- Ganapathipalayam village, Coimbatore district, Tamil Nadu, 9 October: a statue of Mary was damaged by Hindu extremists. Three vandals were arrested.
- Anola, Uttar Pradesh, 12 October: Pastor Jallal Masih was threatened and harassed by Bajrang Dal and RSS members.
- Chutia, Ranchi district, Jharkhand, 19 October: four missionaries were attacked by Hindu extremists.
- Dehra Dun district, Uttarakhand, 3 November: Bethesda Church was vandalised, and Pastor Asher Wasker was beaten by RSS and Bajrang Dal extremists. A complaint was lodged with the police and three of the attackers were arrested under sections 323, 427, 452, 380 and 295 of the IPC and then released on bail.
- Kasauli village, Solan district, Himachal Pradesh, 12 November: a Baptist church was burnt down. Pastor Ashok Massey suspected Hindu extremists of an attack, but police reported that the fire was started by a short circuit.
- Bhayander, Mumbai, Maharashtra, 15 November: twenty Christians were attacked and beaten at the Church of Bhayander. Pastor Fernandez was beaten unconscious by VHP members. Around eight attackers were arrested under sections 143, 147, 148, 149, 451, 427 and 323 of the IPC.
- Blijeet Nagar, New Delhi, 27-28 November: Hindu extremists accompanied by a policeman, named as Joth Ram from Anand Parbat police station, attacked St Pentecostal Capstone Church and took documents, Bibles and musical instruments and demolished a wall. Following this, on 30 November, four police officers, led by D.K. Singh, verbally abused the pastor, M.S. Jeblin. The police station refused to file a complaint.
- Sangur village, Punjab district, Punjab, 2 December: two Bible OM team college students, Pani Garhi and Kiran Bhai, were beaten by Bajrang Dal members and taken to the police station. They were released without charge, and the attackers were given a warning by police.

- Tangmeiband village, Imphal West district, Manipur, 14 December: a church building was dismantled and the pastor and his family were beaten. A warning was issued to Christian minorities living in the tribal communities not to practice their faith, and two people were arrested in connection with the attack and threats.

6. Notes

6.1. Acknowledgements

This briefing owes a great deal to numerous organisations and individuals, particularly for their provision and verification of the details of incidents and their analysis of legislation. Special gratitude is owed to CSW partner, the aicc, and also to the CLA.

Additional sources used in this report are the aicc, Assist News Service, Catholic Bishops' Conference of India (CBCI), Compass Direct News Service, Evangelical Fellowship of India (EFI), the Global Council of Indian Christians (GCIC) and *The Hindu* newspaper.

6.2. Acronyms

aicc	All India Christian Council
BJP	Bharatiya Janata Party
CLA	Christian Legal Association
FIR	First Information Report
IPC	Indian Penal Code
NCM	National Commission for Minorities
RSS	Rashtriya Swayamsevak Sangh
VHP	Vishwa Hindu Parishad