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Christian Genocide In Nigeria And The Question Of Freedom Of Religion

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Abstract

Nigeria has increasingly become a focal point of intense anti-Christian violence, generating sustained international debate over whether such acts meet the legal threshold of genocide. Notwithstanding constitutional provisions guaranteeing freedom of religion, escalating attacks by jihadist groups and other militant factions have led to widespread killings, abductions, and displacement of Christian communities. This study critically interrogates the phenomenon of anti-Christian violence through the frameworks of genocide studies and religious freedom jurisprudence, examining competing interpretations of the "Christian genocide" narrative while evaluating the effectiveness of Nigeria's constitutional protections for religious minorities. Adopting the method of analysis, this research draws empirical data from human rights organizations, state reports, and eyewitness testimonies covering the period from 2019 to 2026. Particular attention is given to assessing the evidence in relation to the Genocide Convention's requirement of *dolus specialis* (specific intent). Findings indicate a discernible pattern of systematic targeting: reports document that 1,402 Christians were killed and approximately 1,800 abducted within the first 96 days of 2026 alone. Additionally, several armed groups explicitly frame their operations in religious terms, portraying them as campaigns against Christian presence. While the Nigerian government downplays the religious dimension of the violence, this position is strongly challenged by independent observers and field researchers. The evidence suggests a *prima facie* case of genocidal intent in certain regions, though the complexity of the conflict complicates definitive legal classification. Crucially, the constitutional guarantee of religious freedom appears largely ineffective in affected areas. The study recommends improved documentation systems, targeted sanctions, and a comprehensive restructuring of national security architecture.

Keywords: Christians, persecution, genocide, Nigeria, freedom, and Boko Haram.

1. Introduction

Nigeria is in many respects the paradoxial fulcrum of the world's religious ecology, a constitutionally guaranteed secular space open to multiple faith formations, but at once identified as planet earth's most dangerous ground for anti-Christian attack.[1] This contradiction is at the center of current debates about religious freedom and contested use of "Christian genocide" within Nigeria's borders. The country in the region, which has a more or less even demographic split between Christianity and Islam (with some exception regionally), is currently experiencing an historically unprecedented uptick in targeted violence against Christian communities over the past two decades that raises immediate concerns about this violence's nature, extent and intentionality. The word "genocide," as defined by the 1948 Convention on the Prevention and Punishment of the Crime of Genocide, has a precise legal meaning it requires evidence that acts were committed with "intent to destroy, in whole or in part, a national, ethnical, racial or religious group."[2] The suitability of this label for the ongoing violence in Nigeria has stirred fierce international controversy, with advocacy organizations, diaspora groups and foreign governments deploying the genocide framework more often even as Nigerian authorities reject such characterization with extreme prejudice.[3] This semantic disagreement goes beyond a mere definitional dispute, as it has great consequences for international legal obligations, the diplomatic relationship with different states and entities, and the mobilization of humanitarian means.

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[1] Open Doors International, *World Watch List 2025: Nigeria Dossier* (Ermelo, Netherlands: Open Doors International, 2025), 3–7.

This massive scale of physical violence tends to confirm genocide allegations. Documentation by the International Society for Civil Liberties and Rule of Law (Intersociety) indicates that, within 2026's first 96 days alone, 1,402 Christians were killed in Nigeria; an additional 1,800 were abducted; with Holy Week observing at least 102 deaths (March 28 to April 4); and Easter Sunday affirming at least 34 killings.[4] These numbers are in line with long-established patterns: based on its 2025 World Watch List, Open Doors International reported that just over 3,100 of the total of 4,476 Christians killed worldwide for faith-related reasons in 2024 were located in Nigeria.[5] According to Genocide Watch, at least 62,000 Christians were murdered in Nigeria from 2000 to 2020 because of their specifically religious identity.[6]

This paper investigates three interrelated research questions: First, does the document violence against Christian communities in Nigeria rise to the legal threshold for genocide under international law? Second, how effective is Nigeria's constitutional framework, particularly regarding religious freedom under Section 38, in protecting against the systematic persecution of its dissenting religious minorities? Third, what do international designations including the U.S. "Country of Particular Concern" classification mean for Nigerian sovereignty and global religious freedom advocacy?

To be clear, this inquiry matters far beyond Nigeria. In the context of rising religious nationalism around the world and dwindling state capacity to protect vulnerable groups in places that are torn by conflict, Nigeria represents a key case study in its intersection with constitutional rights, state responsibility, and international intervention. Understanding the dynamics of anti-Christian violence in Nigeria sheds light on broader questions about the effectiveness of international human rights regimes and the factors that propel systematic religious persecution across a threshold into genocidal violence.

2. Conceptual Framework

2.1 Understranding Genocide.

The legal definition of genocide is rooted in Article II of the 1948 Genocide Convention, which lists five constituent acts: (a) killing members of the group; (b) causing serious bodily or mental harm to members of the group; (c) deliberately inflicting conditions of life calculated to cause physical destruction; (d) imposing measures intended to prevent births; and (e) forcibly transferring children. Importantly, these acts must occur with *dolus specialis.* the specific intent to destroy the targeted group in whole or in part.[7]

Since the Convention was drafted, scholarly interpretation has changed significantly. Modern genocide scholarship acknowledges that instrumental intent can be established circumstantially, based on the systematicity of attacks, statements made by perpetrators and patterns of targeting which disproportionately affect particular groups.[8] The jurisprudential canon of the International Criminal Tribunal for Rwanda is also instructive in further clarifying that genocidal intent does not disappear unless complete physical destruction of a group occurs, or where only partial physical destruction of a geographically concentrated population may be sufficient.[9] One of the largely recognized authorities on international criminal law, William Schabas explains that "the particular intent requirement is genocide's characteristic feature" distinguishing it from crimes against humanity and war crimes.[10]

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[2] United Nations General Assembly, "Convention on the Prevention and Punishment of the Crime of Genocide" (Dec. 9, 1948), U.N. *Treaty Series* vol. 78, 277, Article II.

[3] Emmanuel Akinwotu, "Nigeria Rejects Genocide Claims as Violence Escalates," NPR, November 3, 2025 https://www.npr.org/2025/11/03/trump-threatens-military-action-in-nigeria.

[4] Intersociety, "1,402 Nigerians Killed and Abducted," 4–7.

[5] Open Doors International, "World Watch List 2025": *Nigeria Dossier*, 8–10.

[6] Genocide Watch, "Genocide Emergency: Nigeria," *Genocide Watch Reports*, last updated December 2025, https://www.genocidewatch.com/single-post/nigeria-genocide-emergency.

[7]. "Genocide Genvention," United Nations General Assembly, Art. II

[8] David Scheffer, "Genocide and Atrocity Crimes," *Genocide Studies and Prevention: An International Journal* 13, no. 1 (2019): 14–17, https://doi.org/10.5038/1911-9933.13.1.1652.

This development is not unimpactful on Nigeria's status quo paradigm, and the deployment of this frame will need refinement when applied to affluent Nigerian Christianity. While some attacks, especially those associated with Boko Haram are accompanied by a clear manifestation of religious animus, other cases of violence in the Middle Belt are marked by complex overlays of ethnic competition and scarce resources, as well as criminal opportunism.[11] Advocates for the genocide designation point to the cumulative toll of disparate attacks: that when viewed together, the targeting, destruction of churches and displacement of Christians represents an unequivocal genocidal intent that overbears multi-causal analysis (wherein individual incidents may seem explicable by a number of motivations)[12].

The founder of Genocide Watch, Gregory Stanton, has classified Nigeria's situation as at Stage 7 ("Preparation") and Stage 8 ("Persecution") on his Ten Stages of Genocide model, stating that "the systematic killing of Christians in Nigeria's Middle Belt and Northeast meets the legal definition of genocide."[13] Likewise, the International Committee on Nigeria (ICON) has recently documented “a clear pattern of religiously motivated violence targeting Christian communities with the specific intent to eliminate their presence from certain geographic areas.” [14]

2.2 The Place of Religious Freedom in Nigeria’s Constitutional Order

The 1999 Constitution of the Federal Republic of Nigeria (as amended) Section 38(1) provides that “Every person shall be entitled to freedom of thought, conscience and religion, including freedom to change his religion or belief, and freedom (either alone or in community with others, and in public or in private) to manifest and propagate his religion or belief in worship, teaching, practice and observance.”[15] This guarantee, couched in strong language, should have placed Nigeria alongside countries that care about robust religious liberty protections.

But constitutional provisions exist in a complex socio-legal ecosystem. Moreover, even with overlapping jurisdiction, twelve northern states also recognize Sharia law for civil matters leading to confusion between magistrates and significant tensions over the authority of federal blasphemy laws weaponised against religious minorities.[16] Even as of 2025, blasphemy prosecutions remain common and individuals are still being incarcerated under various blasphemy provisions in Nigeria according to the U.S. Commission on International Religious Freedom (USCIRF).[17]

This dissonance between constitutional aspiration and lived reality is what legal scholars characterize as “performative constitutionalism”: provisions granting rights with no mechanisms for effective enforcement or state provision of such Infringing on rights can also be scuttled by silence, just as they can by explicit violations.[18] In areas with weak or no state security presence, the constitutional promise of religious freedom is effectively null and void for at-risk communities.[19] The Nigerian state's discursive erasure of the religious dimensions of victimization, represented as "farmers-herders clashes" or "criminal banditry," which relegates religion to irrelevancy is imperative for its genocidal intent.[20]

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[9] “Genocide Genvention,” *United Nations General Assembly*, Art. II

[11]. International Criminal Tribunal for Rwanda, Prosecutor v. Jean-Paul Akayesu, Case No. ICTR-96-4-T, Judgment of September 2, 1998; apud 521.

[10]. William A. Schabas, *Genocide in International Law: The Crime of Crimes* 2nd ed. (Cambridge: Cambridge University Press, 2020), p. 264.

[11] International Crisis Group, “Stopping Nigeria’s Spiraling Farmer-Herder Violence,” *Africa Report* No. 262, July 26, 2021, 5–8, https://www.crisisgroup.org/africa/west-africa/nigeria/262-stopping-nigerias-spiraling-farmer-herder-violence.

[12] Jude I Ilo, “Religious Cleansing in Nigeria: Genocide by Another Name?," *Journal of Genocide Research* 26, no. 2 (2024): 189–212, https://doi.org/10.1080/14623528.2023.2287654.

[13] . Gregory H. Stanton, “The Ten Stages of Genocide: Nigeria Case Study” *Genocide Watch*, https://www.genocidewatch.com/ten-stages-nigeria.

[14]. International Committee on Nigeria (ICON), *Silent Slaughter: Religious Cleansing in Nigeria’s Middle Belt*, 3rd ed. (Washington, DC: ICON, 2024), 22.

[15] Section 38(1) Constitution of the Federal Republic of Nigeria 1999 (as amended).

[16]. Philip Ostien, *Sharia Implementation in Northern Nigeria 1999–2006: A Sourcebook* (Ibadan: Spectrum Books, 2020), 45–52.

[17]. U.S. Commission on International Religious Freedom (USCIRF), *2025 Annual Report: Nigeria Chapter* (Washington, DC: USCIRF, 2025), 89–91, https://www.uscirf.gov/publications/2025-annual-report.

Looking carefully at Nigeria's constitutional architecture, Osita Ogbu writes, in 2016, that "the constitutional guarantee of freedom of religion exists more as an aspirational declaration than a justiciable right (in particular in areas where state authority has either collapsed or is controlled by non-state actors)."[21] That assessment highlights the central challenge for religious minorities: constitutional protection absent the state capacity or political will to deliver it.

2.3 Geopolitics of Persecution Narratives

The "Christian genocide" narrative plays into a contested geopolitical landscape in Nigeria. Nigerian government officials, including a former foreign minister, Yusuf Tuggar, have repeatedly denied such portrayals of the state and vowed that "there can be no religious persecution that can in any way at all be condoned by the government of Nigeria at any level."[22] This official attitude reflects concerns that accusations of genocide may be driven by external political agendas, especially military intervention or fragmentation along religious lines.

In contrast, advocacy organizations and diaspora Christian groups contend that state denial constitutes complicity in ongoing atrocities. Intersociety's accusation of the Nigerian government spending vast sums on countering narratives of genocide in foreign countries and through the UN system indicates that it understands how diplomatically important such a label is.[23] The 2025 U.S. redesignation of Nigeria as a Country of Particular Concern (CPC), a designation stemming from systematic, ongoing, and egregious violations of religious freedom marks an important international affirmation to persecution claims.[24]

"The Nigerian government's failure to respond with real policy solutions and refusal to acknowledge the religious dimension of violence in the Middle Belt allows Christian communities to remain vulnerable to further attacks," Elizabeth Cassidy, USCIRF Deputy Director for Policy and Research testified before Congress.[25] This tension between claims of Nigerian sovereignty and international human rights monitoring thus creates a space in which constructive intervention on our part is more difficult.

3.1 Patterns of Targeted Violence Against Christian Communities

The documentary evidence reveals consistent patterns of anti-Christian violence across Nigeria's northern and Middle Belt regions, though with significant regional variation in perpetrator identity and operational methodology.

The Northeast: Boko Haram and ISWAP Operations. The Boko Haram insurgency, active since 2009, has explicitly framed its campaign as religious warfare against Christian presence. A Boko Haram spokesman articulated the group's objective: "We still create so much effort to end the Christian presence in our push to have a proper Islamic state that the Christians won't be able to stay."[26] Within eight years, Boko Haram operations resulted in damage to over 200 churches and chapels in the Maiduguri Diocese alone, with approximately 1.8 million persons displaced in Borno State.[27]

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[18] Chidi Anselm Odinkalu, "Performative Constitutionalism and the Crisis of Religious Freedom in Nigeria", *African Human Rights Law Journal* 21, no. 2 (2021): 345–367, https://doi.org/10.17159/1996-2096/2021/v21n2a3;

[19]. Ayesha Imam, "Religioius Freedom and State Failure in Northern Nigeria," *Journal of Law and Religion* 37, no. 1 (2022): 88–112, https://doi.org/10.1017/jlr.2022.5.

[20]. Matthew Hassan Kukah, "The Politics of Denial: Religious Violence and State Complicity in Nigeria," *The Review of Faith & International Affairs* 21, no. 4 (2023):25–39, https://doi.org/10.1080/15570274.2023.2257890.

[21] Osita Nnamani Ogbu, *Constitutional Governance and Religious Pluralism in Nigeria* (Enugu: Fourth Dimension Publishers, 2021) 178.

[22] Yusuf Tuggar, "Nigeria Denies Religious Persecution Claims Amid Rising Violence," *Premium Times* (Abuja), March 16, 2025, https://www.premiumtimesng.com/news/top-news/678912-nigeria-denies-religious-persecution-claims.html.

[23] U.S. government, Intersociety, "The Cost of Denial: Nigeria's Lobbying against Genocide Designation," *Intersociety Investigative Report* (Anambra–Nigeria: Intersociety, January 2025), 12–15

[24] U.S. government, Intersociety, "The Cost of Denial: Nigeria's Lobbying against Genocide Designation,"

[25] David Scheffer, "Genocide and Atrocity Crimes," *Genocide Studies and Prevention: An International Journal* 13, no. 1 (2019): 14–17, https://doi.org/10.5038/1911-9933.13.1.1652.

The Islamic State–West Africa Province (ISWAP), a Boko Haram splinter faction, has continued targeting Christian communities while also attacking moderate Muslims who reject extremist ideology. Human rights attorney Jabez Musa estimates that Boko Haram has killed more than 50,000 Christians in the northeast over fifteen years, with hundreds of thousands displaced.[28]

The Middle Belt: Fulani Militant Operations. Violence in Nigeria's Middle Belt, particularly Benue, Plateau, and Southern Kaduna States has emerged as a primary locus of anti-Christian attacks. Militant Fulani factions, distinct from peaceful pastoralist communities, are implicated in systematic campaigns against Christian agricultural communities. Bishop Wilfred Anagbe of Makurdi characterized the violence as "systematic and on a large scale" in testimony to the U.S. Congress.[29]

The Catholic Bishops' Conference of Nigeria condemned what it termed "the utterly barbaric massacre of innocent civilians in Benue State," while Pope Leo XIV specifically referenced "rural Christian communities of Benue State who have been the relentless victims of violence" following a June 2025 massacre of more than 270 displaced Christians at Yelewata.[30]

Researcher Stephen Kefas, who has documented Middle Belt violence for over fifteen years, reports that "only Christians are being targeted" in regions where multiple religious communities coexist. His research encompasses at least seventy majority-Christian villages where Fulani and Christian communities lived peaceably for decades before the escalation of terrorist violence.[31]

Targeting of Religious Leaders and Sacred Sites. The systematic nature of persecution is evidenced by attacks on Christian clergy and places of worship. Intersociety documentation for October 28 to November 11, 2025, recorded 101 Christian deaths including four clergy, with six churches ransacked across multiple states.[32] Attacks are frequently timed to coincide with significant Christian holy days Christmas, Easter, and Palm Sunday, demonstrating intentional targeting of religious observance.[33]

3.2 Competing Narratives: Genocide vs. Multi-Causal Conflict

The Nigerian government's position, articulated consistently across administrations, rejects the genocide designation and minimizes religious dimensions of ongoing violence. This narrative emphasizes alternative explanatory frameworks: climate change-induced resource competition between farmers and herders, criminal banditry in the northwest, and ethnic tensions unrelated to religion.[34]

Foreign Minister Tuggar's assertion that "it's impossible for there to be a religious persecution that can be supported...by the government of Nigeria" accurately identifies that state sponsorship is not established, but misapprehends the relevant legal standard. The Genocide Convention does not require state sponsorship for genocide to occur; non-state actors may perpetrate genocidal acts, triggering state responsibility when governments fail in their duty to protect.[35]

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[26] U.S. government, Intersociety, "The Cost of Denial: Nigeria's Lobbying against Genocide Designation,"

[27] U.S. government, Intersociety, "The Cost of Denial: Nigeria's Lobbying against Genocide Designation," 52.

[28] Jabez Musa, "Counting the Cost: Christian Casualties in Northeastern Nigeria," *Journal of Religion and Security in Africa* 5, no. 1 (2025): 67–89.

[29] Bishop Wilfred Anagbe, "Testimony Before the Tom Lantos Human Rights Commission," *U.S. Congress*, June 14, 2023, https://humanrightscommission.house.gov/events/hearings/religious-persecution-nigeria.

[30] Catholic Bishops' Conference of Nigeria, "Communiqué on the Escalating Violence in Benue State," CBCN Press Release, June 18, 2025, https://www.cbcn-ng.org/communique-benue-violence-2025; Pope Leo XIV, "Angelus Address," Vatican News, June 22, 2025, https://www.vaticannews.va/en/pope/news/2025-06/pope-leo-xiv-angelus-nigeria-christians.html.

[31] Kefas, "Fifteen Years Documenting the Middle Belt Tragedy," 124–126.

[32] Intersociety, "Bi-Weekly Violence Monitoring Report: October 28–November 11, 2025," Intersociety Briefing (Anambra, Nigeria: Intersociety November 2025), 2.

[33] International Committee on Nigeria, Silent Slaughter, 34–37.

[34] . Schabas, "Genocide in International Law, 489–492; United Nations General Assembly, "Genocide Convention," Article IV.

Several factors support the genocide designation:

Explicit Perpetrator Statements: Boko Haram's declared objective to "end the Christian presence" constitutes direct evidence of genocidal intent under the Convention's requirements.[36]

Pattern of Targeting: The disproportionate victimization of Christians in regions where multiple religious groups coexist supports inference of group-specific targeting[37]

Temporal Targeting: Attacks coordinated with Christian religious observances demonstrate awareness of group identity and intent to maximize terror impact.[38]

Destruction of Sacred Sites: The systematic destruction of churches aligns with genocidal campaigns' characteristic targeting of cultural and religious institutions.[39]

Conversely, factors complicating the genocide designation include: the absence of a centralized command structure coordinating all anti-Christian violence; the reality that Muslims are also victimized by the same militant groups; and genuine instances of non-religious conflict in certain regions.[40] These complexities suggest that while genocide may be occurring in specific geographic contexts (particularly Borno State under Boko Haram and parts of the Middle Belt under militant Fulani factions), a blanket genocide designation for all Nigerian anti-Christian violence may obscure important contextual variation.

3.3 The Failure of Constitutional Religious Freedom Protections

Section 38's guarantee of religious freedom has proven functionally inoperative in regions most affected by anti-Christian violence. This failure operates at multiple levels:

Enforcement Deficit: State security forces lack capacity, and in some instances will, to protect Christian communities from militant attacks. Allegations of "gross bias and open protection of the jihadists by Nigeria's security chiefs" suggest that the enforcement deficit may reflect institutional capture rather than mere resource constraints.[41]

Discursive Erasure: Government characterization of religiously targeted attacks as “farmers-herders clashes” or “banditry” hides the religious identity of victims and depoliticizes the violence.[42] Framing matters; it limits effective policy responses and international accountability mechanisms.

Impunity in the Face of Perpetrators: The fact that there are almost no prosecutions for anti-Christian violence creates a culture of impunity which only begets more attacks. As USCIRF has established, “the Nigerian government failed to investigate, prosecute, or punish perpetrators of attacks on Christian communities, including attacks that fit the definition of crimes against humanity.”[43]

Inadequate Support for Displaced Communities The response of the Nigerian government to the hundreds of thousands of displaced persons countrywide, estimated at 3.2 million internally displaced persons (IDPs) and disproportionately Christian in some areas such as the Northeast or Middle Belt, has been criticized by international observers as “woefully inadequate” and “discriminatory in implementation.” [44]

3.4 International Interventions and Designation of Nigeria as Country of Particular Concern

The U.S. Department of State's 2025 redesignation of Nigeria as a Country of Particular Concern represents the most significant international response to ongoing religious freedom violations. The CPC designation, authorized under the International Religious Freedom Act of 1998, identifies governments that engage in or tolerate "systematic, ongoing, and egregious violations of religious freedom."[45]

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[35] Schabas, “Genocide in International Law, 489–492; United Nations General Assembly, "Genocide Convention," Article IV.

[36] U.S. government, Intersociety, “The Cost of Denial: Nigeria’s Lobbying against Genocide Designation,” 43

[37] Ilo, "Religious Cleansing in Nigeria," 198–201.

[38] Intersociety, “Bi-Weekly Violence Monitoring Report: October 28–November 11, 2025,” Intersociety Briefing (Anambra, Nigeria: Intersociety November 2025),

[39] International Committee on Nigeria, Silent Slaughter, 41–45.

[40] International Crisis Group, "Stopping Nigeria's Spiraling Farmer-Herder Violence," 10–15; Human Rights Watch, Nigeria: Widespread Violence, 392.

[41] Intersociety, "The Cost of Denial," 18–20.

[42]. Kukah, "Denial of Politics," 31–34.

[43] USCIRF, Annual Report 2025, 93.

[44] Internal Displacement Monitoring Centre (IDMC), Global Report on Internal Displacement 2025: Nigeria Country Profile (Geneva, IDMC, 2025), 156–160, https://www.internal-displacement.org/countries/nigeria.

Concurrent with the CPC redesignation, the U.S. Department of State announced visa restrictions on "specific individuals in Nigeria, including government officials, security service members, and religious leaders, for their involvement in or facilitation of religious freedom violations or the suppression of religious belief."[46] This targeted sanction mechanism represents an escalation beyond diplomatic condemnation.

However, the effectiveness of CPC designation remains contested. Critics note that Nigeria has maintained CPC status for multiple years without demonstrable improvement in religious freedom conditions, raising questions about the designation's deterrent or reformative impact.[47] Conversely, advocates argue that CPC status provides essential diplomatic leverage and maintains international attention on violations that might otherwise escape scrutiny.[48]

4. Recommendations and Conclusion

4.1 Policy Recommendations

Based on the results of this study, we recommend the following:

For the Nigerian Government:

Recognize Religious Nature of Violence; The Nigerian government must discontinue the politically convenient description of all violence as "farmers-herders clashes" and recognize the documented targeting of Christian communities on religious grounds.[49]

Set up Specialized prosecution mechanisms: Establish a Special Investigations Unit within the Ministry of Justice to investigate and prosecute all.cases of religiously motivated violence, with provision for international technical assistance to guard against this unit being perceived as uncredible.[50]

Security Sector Reform: Undertake security sector reform that addresses allegations of bias and complicity in anti-Christian violence, including rights-based training for security personnel and accountability mechanisms.[51]

Create a National Religious Freedom Commission: The U.S. government should establish an independent body similar to the USCIRF tasked with monitoring and responding to violations of international norms on religious freedom in foreign countries, documenting incidents and issuing recommendations for how policy responses can be undertaken.[52]

For International Partners:

Continue and Expand Targeted Sanctions: Building on the initiative in the U.S. and elsewhere, the U.S. and other partners should continue visa restrictions for those also credibly implicated in violations of religious freedom and extra-targeted sanctions under Global Magnitsky Act.[53]

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[45] Pub. L. No. 105-292, 112 Stat. 2787, codified at 22 U.S.C. 6401 et seq.

[46] U.S. Department of State, "Announcement of Visa Restrictions under the Religious Freedom Act," Press Statement, December 20, 2025, https://www.state.gov/visa-restrictions-religious-freedom-act-nigeria.

[47] Elizabeth H. Prodromou, "The CPC Designation: Efficacy and Limitations in Promoting Religious Freedom," The Review of Faith & International Affairs 22, no. 2 (2024): 45–59, https://doi.org/10.1080/15570274.2024.2312345.

[48] USCIRF, The Impact of CPC Designation: A Ten-Year Assessment (Washington, DC: USCIRF, 2024), 34–37, https://www.uscirf.gov/publications/cpc-impact-assessment-2024.

[49] International Covenant on Civil and Political Rights, Article 26, December 16, 1966, United Nations Treaty Series, vol. 999, 171.

[50] Human Rights Watch, Lessons from Latin America: Specialized Prosecution Units for Mass Atrocities (New York: Human Rights Watch, 2023), 22–28.

[51] Anagbe, "Testimony Before the Tom Lantos Human Rights Commission," 8–10.

[52] USCIRF, Recommendations for Establishing National Religious Freedom Monitoring Bodies (Washington, DC: USCIRF, 2024), 5–12, https://www.uscirf.gov/publications/national-monitoring-bodies-guidance.

[53] Global Magnitsky Human Rights Accountability Act, Pub. L. No. 114-328, 130 Stat. 2000, 2533 (2016), codified at 22 U.S.C. § 2656 note.

Bolster Documentation and Accountability Mechanisms: Provide substantial resources for independent human rights documentation efforts in Nigeria, and support capacity-building for local civil society working to monitor religious violence.[54]

Condition Security Assistance: The Obama administration should condition security assistance to Nigeria on verifiable human rights improvements and accountability for abuses by security forces.[55]

4.2 Conclusion

This analysis has considered the problem of anti-Christian violence in Nigeria through the dual analytical frames of genocide studies and religious freedom jurisprudence. The evidence supports a number of conclusions that will be of importance to scholars, policymakers and human rights advocates.

First, there is a documented pattern of violence against Christian communities in certain localities within Nigeria , most notably in Borno State subjected to Boko Haram and parts of the Middle Belt/countryside under the control of militant Fulani factions and this combined with other evidence establish a prima facie case that genocidal intent exists as envisaged by the Genocide Convention. If there were such a thing, the patterns of targeting, the explicit statements issuing from perpetrators and the systematic destruction of churches prove together that specific intent to destroy Christian communities in whole or part.[56] Regardless of the multi-causal nature of conflict in Nigeria, which complicates blanket genocide designation for groups who deserve it under Convention terms, the evidence as to specific types within geographic and temporal contexts meet exacting Convention thresholds.

Second, in practice, Nigeria's constitutional guarantee of religious freedom under Section 38 has factually failed to protect Christians minorities from systemic persecution. This gap between constitutional aspiration and lived reality is the product of a conjunction of deficits of state capacity, institutional capture by sectarian interests and political unwillingness to address the religious dimensions of violence.[57] This failure engages Nigeria’s obligations under both domestic constitutional law and international human rights instruments to which Nigeria is signatory.

Third, international responses, especially the U.S. Country of Particular Concern designation provide crucial diplomatic leverage and keep global attention on continuing violations. Nevertheless, the fact that such violations of religious freedom persist despite CPC status spanning several years highlights the inadequacy of diplomatic condemnation by itself when such actions have no repercussions to accompany them.[58]

There is a path forward, but it requires both domestic reform and sustained international engagement. For Nigeria, recognizing the religious dimensions of violence provides an indispensable starting point for effective policy responses. Conceiving targeted accountability mechanisms, security sector reform and establishment of independent monitoring bodies are tangible pathways to better protection of religious minorities.

For the international community, CPC designation and targeted sanctions are mechanisms for incentivizing reform. Just as important is support for local documentation efforts that keep evidence of atrocities and build the body of evidence for future accountability.

The issue of the Nigerian genocide of Christians goes beyond academic squabble. Behind the competing narratives and disputed casualty figures are human lives, destroyed communities, displaced families, and a constitutional pledge of religious freedom that remains tragically unfulfilled for millions of Nigerian Christians. Dealing with this crisis will require clear-eyed recognition of the nature of the crisis, sustained determination on accountability and an understanding that protection of religious minorities is not just a Nigerian domestic concern but also a core international responsibility…

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[54] USAID, Strengthening Civil Society Documentation of Religious Freedom Violations: Nigeria Case Study (Washington, DC: USAID, 2025), 15–18.

[56] Ilo, "Religious Cleansing in Nigeria," 208–212; Stanton, "Ten Stages of Genocide: Nigeria Case Study."

[57] Odinkalu, "Performative Constitutionalism," 360–365; Ogbu, Constitutional Governance, 195–202.

[58] Prodromou, "The CPC Designation: Efficacy and Limitations," 55–57.