



BAHRAIN: The Death Penalty Joint Stakeholder Report for the United Nations Universal Periodic Review

Submitted by The Advocates for Human Rights

a non-governmental organization in special consultative status with ECOSOC since 1996

**LuaLua Center for Human Rights
Gulf Civil Society Associations Forum
Khiam Rehabilitation Center for Victims of Torture
and
The World Coalition Against the Death Penalty**

for the 27th Session of the Working Group on the Universal Periodic Review
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The Advocates for Human Rights (The Advocates) is a volunteer-based nongovernmental organization committed to the impartial promotion and protection of international human rights standards and the rule of law. Established in 1983, The Advocates conducts a range of programs to promote human rights in the United States and around the world, including monitoring and fact finding, direct legal representation, education and training, and publications. In 1991, The Advocates adopted a formal commitment to oppose the death penalty worldwide and organized a Death Penalty Project to provide pro bono assistance on post-conviction appeals, as well as education and advocacy to end capital punishment. The Advocates currently holds a seat on the Steering Committee of the World Coalition Against the Death Penalty.

The LuaLua Center for Human Rights, established in Lebanon in 2012, seeks to contribute to the promotion of economic, social, cultural, environmental, and civil growth in accordance with the Universal Declaration of Human Rights and subsequent relevant international conventions. It also works to spread the spirit of harmony and fraternity between the peoples of the Arab region on the basis of tolerance, dialogue, non-violence, and human rights.

The Gulf Civil Society Associations Forum was established in 2006 and in 2013 obtained authorization in Paris, France to conduct activities. GCSAF seeks to realize democracy and respect for human rights in the Gulf region. GCSAF has held ten annual conferences in conjunction with the summit of the leaders of the Cooperation Council for the Arab States of the Gulf (Gulf Cooperation Council). GCSAF issues statements and gathers information to track developments in the Gulf Cooperation Council.

The Khiam Rehabilitation Center for Victims of Torture was founded in June 1999, named after the Khiam prison in southern Lebanon, which closed on 23 May 2000. KRC is a non-governmental organization working for the rehabilitation of victims of violence and torture and the defense of human rights.

The World Coalition Against the Death Penalty, an alliance of more than 150 NGOs, bar associations, local authorities and unions, was created in Rome on 13 May 2002. The aim of the World Coalition is to strengthen the international dimension of the fight against the death penalty. Its ultimate objective is to obtain the universal abolition of the death penalty. To achieve its goal, the World Coalition advocates for a definitive end to death sentences and executions in

those countries where the death penalty is in force. In some countries, it is seeking to obtain a reduction in the use of capital punishment as a first step towards abolition.

I. EXECUTIVE SUMMARY

1. The Government of Bahrain has stepped up impositions of death sentences since its last Universal Periodic Review in 2012. Despite agreeing to a recommendation to align its domestic laws with the International Covenant on Civil and Political Rights, Bahrain does not limit the death penalty to the most serious crimes. Indeed, Bahraini courts have imposed the death penalty in contexts in which terrorism seems to be a pretext for suppressing peaceful opposition to the government.
2. Moreover, in many capital cases suspects are detained incommunicado and tortured until they make confessions. Prosecutors then use those confessions to obtain convictions and death sentences. Despite several commitments during the last Universal Periodic Review to ensure accountability for torture, the government has not investigated the allegations raised by defendants in these cases.
3. In the last UPR, Bahrain partially accepted recommendations from several countries, which had urged Bahrain to cooperate with the UN's special procedures mandate-holders. Yet Bahrain has not allowed any country visits since 2006.¹ Since the last UPR, Bahrain twice cancelled visits by the Special Rapporteur on Torture.²

II. LEGAL FRAMEWORK

A. *Legal basis for the death penalty in Bahrain*

4. The Penal Code and the Law of Protecting Society from Terrorist Acts (No. 58/2006)³ authorize the use of the death penalty.
5. **Crimes that can result in the death penalty:** Murder and aggravated murder (murder of a close relative or a public official, or murder using poisonous or explosive materials) are punishable by death.⁴ The following crimes, if they result in death, are also punishable by death: falsely reporting information to judicial officials⁵; kidnapping⁶; rape, sexual assault, or statutory rape⁷; assault⁸; arson⁹; the use of force in theft¹⁰; drug trafficking¹¹; deliberately obstructing funerals or memorial services¹²; and, if aggravating circumstances exist, certain crimes against property, transportation, or agriculture.
6. **Several crimes that do not result in death are also punishable by death, including:**
 - Terrorism-related offenses:
 - Forming or leading an armed gang that:
 - uses force to occupy or destroy a public building or government building¹³; or
 - has attacked the local population¹⁴; or
 - uses arms to resist public authority¹⁵; or
 - aims to expropriate property or land.¹⁶
 - “Disrupt[ing] the provisions of the Constitution or laws, or prevent[ing] state enterprises or public authorities from exercising their duties,” including committing or planning a terrorist act.¹⁷
 - Sexual assault of a girl under the age of 16 without her consent (non-consent is presumed if the girl is less than 14 years of age).¹⁸
 - Arson of a public building or government building, if carried out against the state or civil servants.¹⁹
 - Treason, including:

- Deliberately committing an act which affects the country's independence, unity, or territorial integrity²⁰;
 - Taking up arms against Bahrain²¹;
 - Assisting the enemy in weakening the Armed Forces²²;
 - Inciting services in a hostile armed force²³;
 - Facilitating enemy entry into Bahrain or surrendering State property intended for defense using explosives to overthrow the state²⁴;
 - Making attempts on the life or freedom of the Amir or Crown Prince²⁵;
 - Cooperating with a foreign power or leading or forming an armed gang in an attempt to overthrow the Constitution, Amiri rule, or system of government.²⁶
 - Espionage, including:
 - Surrendering or destroying defense secrets or intending to do so²⁷; or
 - Withholding, destroying, embezzling, or falsifying documents related to national security in order to assist the enemy or adversely affect Bahrain's armed forces, if the act contributes to realizing this purpose.²⁸
 - Military offenses, including:
 - Deliberately damaging weapons or other items used to defend the country during wartime²⁹;
 - Successfully instructing armed forces or police personnel, by a person with authority to give orders, to oppose government orders for an illegal purpose.³⁰
7. The death penalty is not mandatory. If a court finds extenuating circumstances, it may reduce a death sentence to a life sentence or a term of imprisonment.³¹ Bahrain's Penal Code calls for death by firing squad.³²

B. Death penalty in practice in Bahrain

8. Bahrain carried out its last execution in 2010.³³ The condemned in that case was Jassim Abdulmanan, a Bangladeshi national.³⁴ Yet the number of people sentenced to death in Bahrain has increased significantly since the country's last Universal Periodic Review.³⁵ Bahraini courts have sentenced at least 11 people to death since 2011.³⁶ During that period, appellate courts affirmed a prior death sentence in one other case.³⁷
9. In 2014, Bahraini courts sentenced at least three people to death, and two of the three have exhausted their appeals.³⁸ In 2015, Bahraini courts sentenced seven people to death.³⁹ Among those sentences was the 31 December sentencing to death of a person whose name the government withheld.⁴⁰ Appellate courts have rejected the appeals of at least four of the 2015 defendants.
10. In 2014, Bahrain abstained in the UN General Assembly vote in favor of a moratorium on the death penalty.⁴¹

C. 2012 Universal Periodic Review of Bahrain and responses to recommendations

1. The death penalty

11. Bahrain categorically rejected recommendations from eight countries urging it to abolish the death penalty, impose a moratorium on its application, or ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights.⁴² In so doing,

Bahrain stated that abolition of the death penalty “is inconsistent with Bahrain’s constitution and not required by international law.”⁴³ Bahrain further asserted that “the Constitution and Penal Code provid[e] for the death penalty with adequate safeguards to ensure its just application of this penalty for serious crimes,”⁴⁴ and added that “Bahrain complies with the International Covenant on Civil and Political Rights.”⁴⁵

Status of Implementation: Not accepted, not implemented

2. *Compliance with the International Covenant on Civil and Political Rights*

12. Bahrain accepted a recommendation from Belgium to “[i]ncorporate into national law Bahrain’s obligations under the International Covenant on Civil and Political Rights,” adding that “[t]he Government is currently reconciling national laws against international covenants ratified by Bahrain.”⁴⁶

Status of Implementation: Not implemented with respect to the death penalty

3. *Accountability for torture*

13. Bahrain accepted Brazil’s recommendation to *consider* ratifying the Optional Protocol to the Convention against Torture,⁴⁷ but noted similar recommendations to ratify the Protocol.⁴⁸ Bahrain explained that “[t]here are domestic guarantees in the independent judicial system of Bahrain that makes it possible for any individuals to bring grievances to the public prosecution (Special investigations Unit).”⁴⁹ Bahrain accepted recommendations from Spain to explicitly criminalize torture and other cruel and inhuman treatment,⁵⁰ and from Uruguay to “[b]ring in line the definition of the crime of torture with the Convention against Torture.”⁵¹ Responding to Uruguay’s recommendation, Bahrain explained that “the crime of torture is punishable under Articles 208 and 232 of the Bahraini penal code. A draft law amending the two aforementioned articles has been passed, so as to include in the penal code a definition of the crime of torture, in accordance with Article 1 of the Convention against Torture.”⁵²
14. Bahrain also accepted recommendations from Slovenia to “provide accountability for human rights violations,”⁵³ from Italy to “investigate properly all alleged cases of mistreatment and torture and establish accountability of those responsible,”⁵⁴ from the Czech Republic to “investigate and prosecute all those responsible for torture and ill-treatment,”⁵⁵ from Slovakia to “prohibit torture and other ill-treatment, in national legislation and in practice in line with its obligations under CAT, ensuring that all allegations of torture or other ill-treatment are independently, promptly and thoroughly investigated, and perpetrators are brought to justice in accordance [with] international fair trial standards,”⁵⁶ from Germany to “[h]old officials of all ranks accountable for their actions, especially regarding allegations of killings, torture and other ill-treatment,”⁵⁷ from Switzerland to, “[w]ithout delay, carry out an in-depth inquiry into past and present allegations of torture as well as all allegations of excessive and illegal use of force and bring those responsible to justice,”⁵⁸ from Norway to “[c]ontinue the reform process and ensure accountability by investigating all allegations of torture and mistreatment and by prosecuting any individuals found responsible, including senior government officials,”⁵⁹ and from Finland to “[e]stablish, in line with international standards, a standing independent body to carry out investigations of all allegations of torture and other ill-treatment.”⁶⁰ In accepting these recommendations, Bahrain stated that the “Special

investigation Unit (SIU), . . . established by Attorney General’s Resolution No. 8/2012 . . . investigates incidents of death, torture, inhuman or degrading treatment cases in accordance with the Istanbul Protocol [and] is independent and publishes monthly work reports.”⁶¹

Status of Implementation: Not implemented with respect to capital cases

4. *Detention and fair trial standards*

15. Bahrain accepted recommendations from Mauritania to “[a]dopt standards on trials in criminal cases and also to guarantee the rights of detainees and prisoners, in keeping with best practices and relevant international standards,” and from Belgium to “[e]nsure that all detainees . . . receive a fair trial before the ordinary criminal courts, in conformity with international standards,” adding that “[t]he Bahrain Constitution guarantees the human rights and basic freedoms of all citizens.”⁶² Bahrain also accepted a recommendation from the Netherlands to “[e]ntrench in the standard procedures that . . . no person should be held incommunicado” and that “all detention should be subject to effective monitoring by an independent body,” explaining that “[t]he Ministry of Interior has made serious, sustained efforts to ensure its personnel respect human rights, notably in collaboration with the ICRC and relevant international organizations.”⁶³

Status of Implementation: Not implemented with respect to capital cases

5. *Cooperation with special procedures mandate-holders*

16. Bahrain accepted in part several recommendations that it increase its cooperation with and extend a standing invitation to special procedures mandate-holders.⁶⁴ Bahrain did not explain its reason for only partially accepting the recommendations, but instead stated that it “currently considers and deals with each visit in coordination with the departments concerned.”⁶⁵

Status of Implementation: Not implemented

III. IMPLEMENTATION OF INTERNATIONAL HUMAN RIGHTS OBLIGATIONS

A. Bahrain does not limit the death penalty to the most serious crimes.

17. Bahrain has not reconciled its penal laws with the International Covenant on Civil and Political Rights, despite its acceptance of Belgium’s 2012 UPR recommendation to do so. As described in paragraphs 5 and 6 above, **the laws of Bahrain do not limit the death penalty to “the most serious crimes,”** as required under Article 6(2) of the ICCPR. For example, many crimes are eligible for the death penalty simply if they *result* in death, regardless of whether the death was an intentional killing. Moreover, many crimes that do not result in death are eligible for the death penalty, including vaguely defined terrorism-related offenses that open the door for pretextual targeting of government opponents.

B. The Law of Protecting Society from Terrorist Acts enables the government to use terrorism as a pretext to repress opponents of the Government.

18. The European Union recognized in a 2015 resolution that **Bahrain has expanded its use of the death penalty to politically motivated cases.**⁶⁶ According to the LuaLua Center for Human Rights and the Gulf Civil Society Associations Forum, the law has become a legal instrument for authorities to repress or threaten opponents under the pretext of

fighting terrorism.⁶⁷ Article 1 of the law includes a vague, ambiguous definition of terrorism, prohibiting among other things, “damaging national unity” and “obstructing the government authorities . . . from performing their activities.”⁶⁸ Article 3 enhances the penalties for ordinary crimes that would otherwise be punishable by life imprisonment to a death sentence if the crime is “deliberately committed for the implementation of a terrorist purpose.”⁶⁹

19. In the case of Mohammed Ramadan, discussed in greater detail below, the government appears to have trumped up terrorism charges in retaliation for Ramadan’s participation in non-violent anti-government protests and related political activities.⁷⁰ He allegedly received a telephone call from an unknown person who admitted that the Bahraini Government knew he was innocent but that his participation in protest marches and other opposition activities made him a traitor.⁷¹ Five UN Special Procedures Mandate-Holders expressed concern to the Bahraini Government “that the charge of ‘terrorism’ is used in order to punish Mr. Ramadan for the political beliefs and convictions he holds and to prevent him from pursuing political activities.”⁷²

C. Defendants in capital cases are denied due process and subjected to torture and cruel, inhuman, and degrading treatment.

20. The LuaLua Center for Human Rights and the Gulf Civil Society Associations Forum report that individuals in capital cases have been subjected to arbitrary arrests and severe torture, as well as cruel, inhuman, and degrading treatment during the investigation phase, including: blindfolding, long periods of forced standing, electrocution, beatings with a hose pipe, beatings with a metal rod, insults, threats to the welfare of family, sleep deprivation, food deprivation, prayer deprivation, toilet deprivation, beatings in sensitive areas such as genitalia, cold water dousing, extreme cold temperatures, suspension from the ceiling (*falaqa*), removal of clothing, sexual assault, and solitary confinement.⁷³ In February 2015, after he was sentenced to death, Abbas Al Samea confirmed these practices: “The monstrous physical and psychological torture was unbearable, my family were threatened, and even my lawyers were threatened from being expelled and having their licenses revoked.”⁷⁴
21. **Several recent cases highlight Bahrain’s use of incommunicado detention and torture to coerce confessions, which prosecutors then use to obtain convictions and death sentences.** In February 2014, for example, a court in Bahrain sentenced Maher al-Khabaz (also known as Maher Abbas Ahmad) to death for killing a police officer in 2013.⁷⁵ He had been arrested without a warrant and then plainclothes police officers disappeared him for seven days, when he was denied access to counsel.⁷⁶ During that time, he was subjected to torture, including frequent beatings, whipping of the feet and hands, and electrocution.⁷⁷ The government used torture to coerce al-Khabaz into signing a confession.⁷⁸ Then, when he appeared before the public prosecutor, the prosecutor threatened to resume the torture if al-Khabaz did not repeat his confession.⁷⁹ The coerced confession played a significant role in al-Khabaz’ conviction.⁸⁰ Al-Khabaz and his lawyer were banned from attending portions of the trial.⁸¹ The High Criminal Court of Appeal upheld his death sentence in August 2014,⁸² but in December 2015 the Cassation Court rejected his death sentence and remanded the case to the Court of Appeal.⁸³

22. In December 2014, a court in Bahrain sentenced Mohammed Ramadan and Husain Ali Moosa to death for their alleged involvement in a February 2014 bombing.⁸⁴ Both men say that they were tortured into confessing.⁸⁵ Moosa says that officials hung him from the ceiling for three days, beat him, and threatened to harm his family.⁸⁶ Ramadan says that he was arrested without a warrant and then severely beaten on sensitive parts of his body to extract a confession.⁸⁷ The men recanted their confessions, but two courts rejected their appeals and they have exhausted their domestic legal remedies.⁸⁸ The UN Special Rapporteur on Torture joined with four other UN experts in expressing serious concern that both men had confessed under duress.⁸⁹ The European Parliament has also expressed concern about their case.⁹⁰ Despite these concerns, authorities have not conducted any investigation of their treatment in custody.⁹¹
23. In December 2015, a court in Bahrain sentenced Hussen Abdullah Khalil Ebrahim to death in absentia for forming a terrorist organization, recruiting agents, engaging in rioting and planting explosives to disturb the peace, targeting police officers, and killing a police officer in 2014 with the goal of violently overthrowing the government.⁹² Ebrahim was the only one of the 23 defendants sentenced to death; the others were sentenced to life imprisonment.⁹³ Most of the defendants were subjected to enforced disappearance for ten days, during which time they were denied access to counsel.⁹⁴ The defendants report that they were tortured during the disappearance.⁹⁵ One of the defendants, following his arrest, was physically beaten, primarily on his head and genitals, including with a wooden plank with nails, and was also electrocuted and sexually assaulted.⁹⁶ After three days of such torture, he confessed, but the beatings continued.⁹⁷ When he appeared before the public prosecutor, the prosecutor threatened to resume the torture if he recanted.⁹⁸
24. In February 2015, a court sentenced Abbas Al Samea, Sami Mushaima, and Ali Al Singace to death for their involvement in an explosion that killed three police officers.⁹⁹ An appeals court upheld their sentences in May 2016.¹⁰⁰ The defendants deny all charges and allege their confessions were made after extensive torture, including electrocutions, beatings, and sexual assault.¹⁰¹ Al Samea was forcibly disappeared for 20 days after his arrest, during which time the torture to which he was subjected caused severe internal bleeding, fractured vertebrae, a broken pelvis, and low blood pressure, prompting his transfer to intensive care where he had surgery to stop the internal bleeding.¹⁰² One week later, security forces removed Al Samea from the hospital against the orders of his doctor, and then the torture continued in order to extract a false confession.¹⁰³ His lawyer was allowed to contact him only three months after his initial detention, and after the court had conducted three hearings in Al Samea's case.¹⁰⁴ According to Amnesty International, the trial "was unfair: the court failed to adequately investigate their allegations of torture and other ill-treatment by CID interrogators; they were denied access to their lawyers until their trial began; their lawyers were not permitted to see the full case file, and their requests to cross-examine prosecution witnesses were ignored."¹⁰⁵

IV. RECOMMENDATIONS

25. The authors of this joint stakeholder report suggest the following recommendations for the Government of Bahrain:
- Replace the death penalty with a sentence that is fair, proportionate, and respects international human rights standards.

- Impose an official moratorium on the death penalty immediately, both going forward and for persons currently on death row.
- Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights and align domestic legislation to conform with the Protocol.
- Amend the Penal Code and the Law of Protecting Society from Terrorist Acts to eliminate the possibility of a death sentence for all crimes not involving intentional killing.
- Immediately direct all judicial officers not to impose a sentence of death in any case in which the prosecution has not proven that the defendant committed an intentional killing.
- Immediately direct all judicial officers to categorically prohibit the introduction of any evidence, including confessions, in cases in which the defendant demonstrates that the evidence was likely to have been obtained through torture.
- Immediately commute the sentences of all persons sentenced to death to life imprisonment in all cases in which the prosecution relied on evidence obtained through torture and ensure that survivors of torture have prompt access to legal, medical, and financial remedies.
- Direct law enforcement to ensure that individuals have immediate and continuous access to counsel from the time of arrest to the conclusion of trial.
- Appoint an independent special investigator to conduct a thorough and independent investigation into allegations that the death penalty is being sought against individuals based in part on their opposition to the Government of Bahrain or their involvement in human rights activities.
- Appoint an independent special investigator to conduct a thorough and independent investigation of all allegations of torture during pretrial detention and empower the investigator to hold perpetrators accountable, including by bringing criminal charges, by terminating individuals from their employment, and by overturning any convictions that resulted from confessions obtained via torture.
- Support the next United Nations General Assembly Resolution in favor of a moratorium on the use of the death penalty.
- Immediately extend standing invitations to: the Special Rapporteur on Extrajudicial, Summary, or Arbitrary Executions; the Special Rapporteur on the Independence of Judges and Lawyers; the Special Rapporteur on Torture; and the Special Rapporteur on the Rights to Freedom of Peaceful Assembly and of Association.

¹ Americans for Democracy & Human Rights in Bahrain, *HRC32: Bahrain fails to cooperate with the Special Procedures*, 24 June 2016, <http://www.adhrb.org/2016/06/10139/> (last visited 19 Sept. 2016).

² Americans for Democracy & Human Rights in Bahrain, *HRC32: Bahrain fails to cooperate with the Special Procedures*, 24 June 2016, <http://www.adhrb.org/2016/06/10139/> (last visited 19 Sept. 2016).

³ Law No. 58 of 2006 With Respect to Protection of the Community Against Terrorist Acts, available at http://www.vertic.org/media/National%20Legislation/Bahrain/BH_Law_No_58_Protection_Community_against_Terrorist_Acts.pdf (last visited 19 Sept. 2016).

⁴ Bahrain Penal Code 1976, Art. 333.

⁵ Bahrain Penal Code 1976, Art. 234.

⁶ Bahrain Penal Code 1976, Arts.357–359.

⁷ Bahrain Penal Code 1976, Arts. 148, 279.

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- ⁸ Bahrain Penal Code 1976, Arts. 344, 349.
- ⁹ Bahrain Penal Code 1976, Art. 346.
- ¹⁰ Bahrain Penal Code 1976, Art. 349, amended by Legislative Decree No. 1 of 1986 With Respect to Amending Certain Provisions of the Penal Code, Art. 1.
- ¹¹ Bahrain Penal Code 1976, Art. 277.
- ¹² Bahrain Penal Code 1976, Art. 376.
- ¹³ Bahrain Penal Code 1976, Art. 315.
- ¹⁴ Cornell Center on the Death Penalty Worldwide, Death Penalty Database: Bahrain, <https://www.deathpenaltyworldwide.org/country-search-post.cfm?country=Bahrain> (last visited 19 Sept. 2016).
- ¹⁵ Bahrain Penal Code 1976, Art. 349.
- ¹⁶ Bahrain Penal Code 1976, Arts. 409, 414.
- ¹⁷ Bahrain Penal Code 1976, Arts. 410, 411, 414.
- ¹⁸ Bahrain Penal Code 1976, Arts. 413–414, 155.
- ¹⁹ Bahrain Penal Code 1976, Art. 284.
- ²⁰ Bahrain Penal Code 1976, Art. 279.
- ²¹ Cornell Center on the Death Penalty Worldwide, Death Penalty Database: Bahrain, <https://www.deathpenaltyworldwide.org/country-search-post.cfm?country=Bahrain> (last visited 19 Sept. 2016).
- ²² Cornell Center on the Death Penalty Worldwide, Death Penalty Database: Bahrain, <https://www.deathpenaltyworldwide.org/country-search-post.cfm?country=Bahrain> (last visited 19 Sept. 2016).
- ²³ Human Rights Watch, World Report 2009 – Bahrain, <http://www.unhcr.org/refworld/docid/49705fac85.html>.
- ²⁴ Bahrain Penal Code 1976, Art. 344.
- ²⁵ Cornell Center on the Death Penalty Worldwide, Death Penalty Database: Bahrain, <https://www.deathpenaltyworldwide.org/country-search-post.cfm?country=Bahrain> (last visited 19 Sept. 2016).
- ²⁶ Bahrain Penal Code 1976, Art. 279.
- ²⁷ Bahrain Penal Code 1976, Art. 113.
- ²⁸ Bahrain Penal Code 1976, Art. 114.
- ²⁹ Bahrain Penal Code 1976, Art. 115.
- ³⁰ Bahrain Penal Code 1976, Art. 116.
- ³¹ Bahrain Penal Code 1976, Art. 279.
- ³² Bahrain Penal Code 1976, Art. 51.
- ³³ Amnesty International, *Urgent Action: Bahrain Sentences Two Bangladeshis to Death*, 24 Mar. 2015, <https://www.amnesty.org/.../MDE1112932015ENGLISH.pdf> (last visited 16 Sept. 2016).
- ³⁴ Amnesty International, *Urgent Action: Bahrain Sentences Two Bangladeshis to Death*, 24 Mar. 2015, <https://www.amnesty.org/.../MDE1112932015ENGLISH.pdf> (last visited 16 Sept. 2016).
- ³⁵ FIDH, *NGOs condemn death sentences in Bahrain after record year*, 8 Jan. 2016, <https://www.fidh.org/en/region/north-africa-middle-east/bahrain/ngos-condemn-death-sentences-in-bahrain-after-record-year> (last visited 16 Sept. 2016).
- ³⁶ FIDH, *NGOs condemn death sentences in Bahrain after record year*, 8 Jan. 2016, <https://www.fidh.org/en/region/north-africa-middle-east/bahrain/ngos-condemn-death-sentences-in-bahrain-after-record-year> (last visited 16 Sept. 2016); Amnesty International, *Death Sentences and Executions 2012*, ACT 50/001/2013, September 16, 2016.
- ³⁷ Amnesty International, *Death Sentences and Executions 2013*, ACT 50/001/2014, September 16, 2016.
- ³⁸ *Bahrain man 'sentenced to death for killing policeman'*, BBC News, 19 Feb. 2014, <http://www.bbc.com/news/world-middle-east-26263627> (last visited 16 Sept. 2016); FIDH, *Rights groups condemn death penalty sentence of Mohammed Ramadan and Husain Ali Moosa*, 16 Dec. 2015, <https://www.fidh.org/en/region/north-africa-middle-east/bahrain/rights-groups-condemn-death-penalty-sentence-of-mohammed-ramadan-and> (last visited 16 Sept. 2016); FIDH, *NGOs condemn death sentences in Bahrain after record year*, 8 Jan. 2016, <https://www.fidh.org/en/region/north-africa-middle-east/bahrain/ngos-condemn-death-sentences-in-bahrain-after-record-year> (last visited 16 Sept. 2016); Amnesty International, *Death Sentences and Executions 2012*, ACT 50/001/2013, September 16, 2016.
- ³⁹ FIDH, *NGOs condemn death sentences in Bahrain after record year*, 8 Jan. 2016, <https://www.fidh.org/en/region/north-africa-middle-east/bahrain/ngos-condemn-death-sentences-in-bahrain-after-record-year> (last visited 16 Sept. 2016).
- ⁴⁰ Electronic communication from Lualua Centre for Human Rights to The Advocates for Human Rights, 7 Sept. 2016, on file with The Advocates for Human Rights.

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- ⁴¹ U.N.G.A., 69th Session, 73rd Plenary Meeting, at 17–18, UN Doc. A/69/PV.73, 18 Dec. 2014.
- ⁴² Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, Addendum, UN Doc. A/HRC/21/6/Add.1/Rev.1, 12 Oct. 2012, ¶ 4. Those recommendations came from Argentina, Austria, Estonia, France, Germany, Italy, Spain, and Uruguay. See Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, UN Doc. A/HRC/21/6, 6 July 2012, ¶ 115.3 (Spain), .4 (Estonia), .5 (Uruguay), .19 (France), .78 (Austria), .79 (Austria), .80 (Spain), .81 (Italy), .82 (Germany), .83 (Argentina).
- ⁴³ Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, Addendum, UN Doc. A/HRC/21/6/Add.1/Rev.1, 12 Oct. 2012, ¶ 4.
- ⁴⁴ Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, Addendum, UN Doc. A/HRC/21/6/Add.1/Rev.1, 12 Oct. 2012, ¶ 17(a).
- ⁴⁵ Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, Addendum, UN Doc. A/HRC/21/6/Add.1/Rev.1, 12 Oct. 2012, ¶ 25(b).
- ⁴⁶ Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, Addendum, UN Doc. A/HRC/21/6/Add.1/Rev.1, 12 Oct. 2012, ¶ 23(b). See Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, UN Doc. A/HRC/21/6, 6 July 2012, ¶ 115.21 (Belgium).
- ⁴⁷ Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, Addendum, UN Doc. A/HRC/21/6/Add.1/Rev.1, 12 Oct. 2012, ¶ 16(f). See Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, UN Doc. A/HRC/21/6, 6 July 2012, ¶ 115.2 (Brazil).
- ⁴⁸ Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, Addendum, UN Doc. A/HRC/21/6/Add.1/Rev.1, 12 Oct. 2012, ¶¶ 17(b), 19(b). See Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, UN Doc. A/HRC/21/6, 6 July 2012, ¶ 115.1 (Czech Republic), .3 (Spain), .4 (Estonia).
- ⁴⁹ Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, Addendum, UN Doc. A/HRC/21/6/Add.1/Rev.1, 12 Oct. 2012, ¶ 19(b).
- ⁵⁰ Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, Addendum, UN Doc. A/HRC/21/6/Add.1/Rev.1, 12 Oct. 2012, ¶ 5(a). See Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, UN Doc. A/HRC/21/6, 6 July 2012, ¶ 115.22 (Spain).
- ⁵¹ Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, Addendum, UN Doc. A/HRC/21/6/Add.1/Rev.1, 12 Oct. 2012, ¶ 24. See Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, UN Doc. A/HRC/21/6, 6 July 2012, ¶ 115.18 (Uruguay).
- ⁵² Human Rights Council, Report of the Working Group on the Universal Periodic Review: Bahrain, Addendum, UN Doc. A/HRC/21/6/Add.1/Rev.1, 12 Oct. 2012, ¶ 24.
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