

Women's Right to Equality with Reference to Citizenship Laws in Pakistan

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Abstract



There are several ways through which a person can become a citizen of a state. A person while becoming a citizen of a particular state must fulfil certain conditions before acquiring such a position. The same conditions have also been mentioned in the citizenship laws of Pakistan but there is a discrimination on the basis of gender. While the 1973 Constitution of the Islamic Republic of Pakistan has made it clear in its article 25 that there should be no discrimination on the basis of gender, this research examines the citizenship laws of Pakistan in this perspective. As there are refugees such as Afghans refugees etc, and other foreigners are living, who are married to Pakistani national females and are facing this issue, therefore an endeavour has been made to find some solution within the existing laws. Here in this research the primary laws, various case laws as well as other scholarly written research articles have been examined.

Keywords: Citizenship Rights, Honorary Citizenship, Immigrants, Jus Soli, Jus Sanguine.

Introduction

The word "Citizen" has been derived from the words City and Zen. "City" means a human community or a society of people, while "Zen" denotes dependent/member of a state. A person is a citizen if they have thorough understanding of legal, social, financial, political, human rights, and are able to defend those rights in accordance with the state's constitution, uphold the sovereignty of the state, and actively engage in its management and advancement. (BATEBI, Citizen and Citizenship Rights, 2015)

It means a citizen is someone who legitimately holds the state's nationality, and is aware of its laws and regulations, loyal to his state, and makes an unlimited/unconditional contribution to its political, social, and economic life.

Every person is entitled to citizenship rights by virtue of being a citizen of a specific state. The state guarantees the freedom to exercise one's rights of residence, education, voting, fair trial, business, family and so on; In addition, each citizen must abide by the preservation of these rights to live a peaceful and prosperous life.

Historical Background of the Concept of Citizenship:

Citizenship is indeed the bond that binds a person to a state, towards which they pledge loyalty and therefore are consequently entitled to its safeguarding. When a state confers citizenship on a person, that person is obligated to fulfil certain rights, commitments, and responsibilities and that the state may deny to some extent to immigrants and non-citizens such rights. (Britannica, n.d.)

Citizenship in Roman and Greece:

The idea of citizenship originally emerged in the Greek polis state, or city state. The individual should demonstrate loyalty to the state and make contributions to its defense, development and administration. The citizens of the polis city state were given special status and were regarded as superior to women, slaves, and foreigners. (Matias, 2016)

The Medieval Periods' Conception of Citizenship:

When Rome and Greece broke apart, a profound change has been taken place. Particularly in Italy, the civilization became urbanized. The society at the period was feudalistic, and the landlords / landowners had unique privileges over the land workers, who served the landowner as common laborer and slaves. As time went on, the population grew, citizenship became more closely tied to

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specific cities, and only individuals with great economic standing and the right to bear arms were granted citizenship.

Formation of Nation States:

In the middle Ages, cities and towns were given citizenship based on their defensive capabilities and financial standing. When the population continuously grew and people aware about his own rights. National states began to emerge. In national states the citizenship was traditionally awarded based on birth or Jus soli, however, the state can also offer citizenship to immigrants, noncitizens, business tycoons, and all those who have exceptional talents and qualifications in a particular sector. The introduction of the passport system also signaled a technological development. Any person who was obedient and assumed responsibility for the state would also be given citizenship by the state.

The Concept of Citizenship in Islam:

The idea of citizenship was unrestricted, universal, unbiased, and borderless in Islam. The only requirements for citizenship were immigration and swearing/oath allegiance to the state. The Holy Prophet Hazrat Muhammad (S.A.W) delivered his final sermon, or Hajja Tul Wida, on the Mount Arafat valley in March 632, which is regarded as the founding document of human rights. The Holy Prophet Hazrat Muhammad (S.A.W) addresses to the mankind in this sermon. O people, all people's ancestors can be traced back to Adam, who was made of clay. Allah has created everyone equally and divided every people into tribes so that they may get to know one another. Both you and your spouses have rights over one another. No one is better than the other, Except for piety and goodness. (SAW, 632)

According to the Muslim faith, All people are equal and worthy of respect regardless of their shared origins/parentage. (SAW). An Arabic word "Muwatana" is used for "citizenship", which means the connection between an individual and a country to which they owes devotion to that country and is deserving of its protection. Allegiance, taxation, and military duty are the typical obligations of citizenship. In Islam, establishing family relations is a requirement for citizenship. Islam also affirms all international legal frameworks and conventions that grant the right to residence and citizenship, with no limitations on the process of obtaining citizenship and without demanding a set amount of years, sums of money, or investment opportunities. Anyone who is born in a state that is home to Muslims will automatically become a citizen of that state. In sharia, the entire world is a considered to be a place where all people should reside. However, they must adhere to the new state's rules and take a pledge of allegiance. (Abdel-Hay)

According to the Charter of Madina's preamble. In which the Messenger of Allah witnessed an agreement being formed between the Clans of Yasrub (Madina) and the Quraish in 622-624 CE. The agreement established a religiously diverse Islamic state and declared it to be the one Ummah while also regulating the relationship between Muslims and Jews in Madina. Everyone enjoys the same rights to citizenship, provided they are loyal, uphold the law, and keeps the community safe. (S.A.W)

Global Prospective on Citizenship:

Citizenship is the relationship that exists between an individual and a state in which the individual has demonstrated unwavering commitment to the state and is consequently protected by that state.

The definition given above makes it obvious that citizenship is the connection or bond that enables a person to become a devoted citizen of a state. Therefore it becomes the primary responsibility of the state to promote, protect, and recognize the rights of every individual. Every individual has an ethical and spiritual obligation to advance the state's services and advancement in whatever way feasible when the state performs these functions for them.

Giving honorary citizenship to foreign businessmen and philanthropists like Bill Gates and super smart sportsmen like Ronaldo, etc., can have a positive impact on the international community. Honorary citizenship is often granted in today's modern states in exchange for one's exceptional services. Most developed countries attract different types of people such as foreign tycoons, foreign businessmen, and highly qualified professionals in industries like medicine, agriculture and sports etc. by awarding honorary citizenship. Then, these people can work better for the advancement and development of that particular state.

Malala Yousafzai received honorary citizenship from Canada for her work in the area of girls' education during the Taliban era. Nelson Mandela also received honorary citizenship from Canada for his significant contributions to the public good. In addition, Angilina Jolie received honorary

citizenship from Cambodia in 2005, In 2011 Lady Gaga received the title of honorary citizen of Sydney. Honorary citizenship can therefore have a positive impact on the economy and social life of the nation, strengthen the people, and make people fall in love with the state. (Wikipedia, n.d.)

United Nation Prospective:

According to the 1959 Declaration on the Rights of Children of the United Nation, a child has the right to a name and a nationality from the moment of his birth. Regretfully, despite adoption of this sort of fair rule by various western nations, Islamic law, and United Nations Resolutions, the majority of Muslim countries, including Pakistan, do not follow it.

Benefits/Rights Associated with Citizenship:

Why do individuals migrate to foreign nations and live long for decades, why do they need citizenship there, why they require citizenship for his spouse as well as for his children, what is the concept behind it, and what rights, benefits, and advantages come with citizenship? Actually, it wasn't a tiny thing, but based on citizenship in that particular state, he or she can be associates/connects with all human and civil rights.

A person's future depends greatly on their citizenship. Citizenship rights are crucial for everyone in every state to determine the rights and privileges that apply to them as a result of citizenship because they will have a greater relationship with citizen engagement in choosing their political, economic, financial, social, and cultural and legal fate. The conscious planning for a state's greater development and management is called citizenship. It inculcates in a person the responsibility and obligations to adhere to the law, pay taxes, and defend his nation/state. (BATEBI, Citizen and Citizenship Rights, 2015)

Due to citizenship, every citizen is entitled to all civil and human rights. There is no real distinction between human rights and citizenship rights. The rights that are accorded to every person by virtue of their belonging in the humankind are known as human rights, while citizenship rights are those that are accorded by a state in accordance with its own constitution. All human rights are granting to Pakistani citizens under the Islamic Republic of Pakistan's constitution of 1973. However, a few of these rights are also guaranteed to anybody inside Pakistan's boundaries, including residents as well as foreigners/aliens and refugees.

Citizenship Rights: A Constitutional Law Perspective:

Every person's rights of citizenship, civil and financial rights are all treated equally under Pakistan's constitution. The constitution is dominant and supreme, says that all laws shall be made in conforming to the teaching of Holy Qur'an and sunnah, and no laws shall be passed which are against the precepts of Islam as outlined in the Holy Quran and Sunnah of the Last Messenger of Allah. Under the 1973 Constitution of the Islamic Republic of Pakistan all these rights are granted to every citizens without any discrimination based on colors, faith, gender, and so on.

The Pakistan Citizenship Act of 1951, on the other hand, contains clause 10 that blatantly violates the fundamental Rights of women, contradicts article 25 of the Pakistani Constitution, goes against fundamental Islamic teachings, and disregards international responsibilities.

The Pakistan Citizenship Act 1951, are far stricter and more burdensome than in other civilized countries. In addition to being uncomfortable, it also violates the Article 25 of the constitution of Pakistan, inconsistent with the Islamic laws as enshrined in the Holy Quran and Sunnah as well as violates fundamental principles of human rights and international agreements.

Political Rights:

Under Pakistan's 1973 constitution, political rights are granted to its citizens including the ability to organize groups and associations, the right to participate in local and general elections, the right to vote and other electoral rights, the right to assemble in a specific location/area etc. however the rights to vote, right to contest election in general and local elections are not granted to foreign nationals/aliens and refugees.

Legal Rights:

The ability to exercise one's legal rights is one of the fundamental rights bestowed upon every human being at birth, regardless of that person's country of origin, ethnicity, colors, faith, or sexual preference. Every state, including the 1973 constitution of Pakistan, grants legal rights such as the protection/safeguard against double and retrospective punishment for the same offence, access to a proper trial, access to the court of law, and the protection/safeguard against unlawful arrest and confinement.

Civil Rights:

Civil rights are granted to all citizens' regardless sex, race, or religious discrimination. The rights to life, education, healthcare, the opportunity to study one's own language and culture, access to information, the freedom to move throughout freely, the right to services and employment, among other things, are examples of civil rights are granting under the constitution of Pakistan.

Economic/Financial Rights:

The majority of countries in the world exclusively provide their own citizens financial rights, denying those of outsiders, immigrants, and refugees even inside their borders. Financial rights can include the freedom to engage in commerce and trade, the right to purchase property, and other things.

The Pakistan Citizenship Act, 1951:

The Pakistan Citizenship Act (PCA) was approved by the Pakistani Constituent Assembly and then enforced on April 13, 1951, as a result of the Governor General's assent. It contains the necessary requirements for obtaining Pakistani citizenship as well as for losing, giving up, and renunciation it. It consists of 23 sections. (Pakistan C. A., The Pakistan Citizenship Act, (PCA) 1951., 1951)

Pakistan came into force on 14th August 1947 as a sovereign and independent country under the Indian independence Act. Pakistan has inherited many substantial and procedural laws as British Empire, however Pakistan do not have any laws to regulate the citizenship and nationality and to distinguish between the foreign nationals/aliens, immigrants and its own citizens, meanwhile the statute was enacted in 1951 with the name of Pakistan Citizenship Act (PCA) 1951. The main objective of the Act to bring together a wide range of people under one umbrella, relocate the British Indian People and all those already residing within its territory of Pakistan. (Nazir, 2016)

Modes/Ways of Acquisition of Citizenship under the Laws in Pakistan:

There are numerous ways through which a person can become a citizen of Pakistan, such as: (1) at the beginning of the statute; (2) birth on Pakistani soil; (3) marriage to a foreigner/aliens/refugees; (4) acquisition of new territory; (5) naturalization; (6) investment in Pakistan; (7) by descent, etc.

(1) Citizenship at the Start/commencement of Act (April 13, 1951):

Since the declaration of independence in 1947, Pakistan and India have been British colonies. On the basis of the two-nation theory, Pakistan proclaimed its independence on August 14 and India on August 15, 1947. A large number of population movements started from one territory to another resulted from the decision to make the province with a majority of Muslims into Pakistani territory and the province with a majority of Hindus into Indian Territory. As a result, those who entered Pakistani territory before or at the time of the establishment of the Statute/Act were considered as Pakistani citizens, while those who fled to India were regarded as foreigners.

This was one of the most straightforward and important way to become a Pakistani Citizen. As according to section 3 of the Pakistani Citizenship Act 1951, any person who entered Pakistani territory before or at the time this Act/Statute was enacted was regarded as a Pakistani citizen. (Pakistan C. A., The Pakistan Citizenship Act 1951, 1951)

(2) Citizenship by Birth/Jus Soli on Pakistani territory:

Jus Soli, which means the "right of the soil," was one of the most straightforward and common way to become a citizen of Pakistan. Anyone born on Pakistani territory/land is considered a citizen of Pakistan, with the exception of enemy aliens, foreign diplomats, and refugees, as stated in section/clause 4 of the Pakistan Citizenship Act, 1951. (Pakistan T. C., The Pakistani Citizenship Act, 1951, 1951)

(3) Citizenship by Descent or jus sanguinis:

Blood right is referred to as jus sanguine. Citizenship is granted by descent in accordance with Section/Clause 5 of the Pakistan Citizenship Act 1951. In accordance with this section/clause, a person must be a direct descendant of Pakistan. Children born to Pakistani citizens, whether inside the country or outside the Pakistani territory, may apply to become citizens of Pakistan if their parents are Pakistanis. Children who were born outside Pakistan's borders or in a foreign country should apply for Pakistani citizenship through the Pakistani Consulate if their parents or any of them are employed by the Pakistani government. (Pakistan T. C., The Pakistan Citizenship Act 1951, 1951)

(4) Citizenship by migration:

The movement of population began at the time of the division of the Indian subcontinent, according to clause/Section 6 of the Pakistan Citizenship Act of 1951 states that anyone who migrated to Pakistani territory or land before January 1st, 1951, after the passage of this Act, and with the

intention to reside permanently on Pakistani territory, shall be awarded citizenship of Pakistan. The federal government may award a domicile or certificate of registration through a general or special order under this provision of this Act. (Pakistan T. C., The Pakistan Citizenship Act 1951, 1951)

(5) Citizenship by naturalization:

One of the methods to become a Pakistani citizen is by naturalization. The Naturalization Act of 1926 may be used to help a person to get Pakistani nationality/citizenship under section/clause 9 of the PCA of 1951.

Under the terms of the Naturalization Act of 1926, the certificate of naturalization may be obtained by submitting an application to the federal government. The applicant must meet certain requirements in order to obtain a certificate of naturalization, including being a major, having high moral standards, being knowledgeable of and fluent in the Pakistani language, and having lived in the country for at least four of the previous seven years. (Pakistan R. o., Naturalization Act, 1926, 1926)

(6) Citizenship by investment policy:

The federal government can grant citizenship of Pakistan to the commonwealth countries national upon general or specific command/order under certain conditions by investing five million rupees in Pakistan. By investing RS 5 million in Pakistan, Commonwealth people can get Pakistani citizenship. The State Bank of Pakistan must certify the transaction before issuing the applicant with a visa for immigrating to Pakistan. On the arrival to Pakistan, a certificate of citizenship is issued. (Pakistan G. o.)

(7) Citizenship via Territory Incorporation/Annexation:

One of the ways of Pakistani citizenship is granted through the annexation or inclusion of territory. According to Section 13 of the PCA of 1951, the president of Pakistan may award citizenship by the annexation of new territory. (Pakistan R. o., The Pakistan Citizenship Act 1951, 1951)

For instance, the deal with Oman allowed for the annexation of Gawadar in the Baluchistan province to Pakistani soil. By order of the Head of State of Pakistan, every person from that newly annexed territory was given Pakistani citizenship.

(8) Citizenship by marriage with a foreign national:

Through marriage a foreigner can become the citizen of Pakistan by adopting the procedure mentioned in the citizenship laws of the country. This right to become the national of Pakistan is only available at the moment to the foreign females by marrying to Pakistani men while on the other hand if a woman of Pakistani origin is marrying a foreign male then this right is not available, which clearly violates Article 25 of the Constitution of Pakistan. In this respect the most contentious provision of the Pakistan Citizenship Act 1951 is clause 10, which negates article 2A and 25 of the 1973 constitution of Pakistan, infringes the fundamental rights of women, contravenes international agreements, and also most significantly transgresses Islamic traditions as codified in the Holy Qur'an and Sunnah.

By virtue of getting married to a Pakistani male citizen, a foreign national woman may be granted Pakistani citizenship under Clause 10 of the Pakistan Citizenship Act 1951, even if her Pakistani spouse has passed away. However, the foreign spouse of a Pakistani woman cannot grant Pakistani nationality based on marital status, and even children born out of wedlock are not eligible for the same category. This not only violates the fundamental rights of the woman and her children but also runs counter to international agreements, fundamental human rights, and Islamic laws and traditions as stated in the Holy Qur'an and Traditions.

Cases Related To Citizenship Through Marriage:

Suo motto of the Federal Shariat Court (FSC) in 2006 against the illegal, unconstitutional, ultra-clause of the Pakistan Citizenship Act of 1951 and recommended/suggested the federal government to amend clause 10 of the Pakistan Citizenship Act of 1951, to make it according to Islamic laws, international conventions, and to acquire it in accordance with article 25 of the Pakistani constitution. The federal government's claim that the FSC verdict had increased unemployment, threatened Pakistan's security and integrity, and increased divorce rates. The Federal government filled an appeal against the verdict of the Federal Shariat Court (FSC) to the supreme court of Pakistan in 2008 which is still sub judice before the Supreme Court of Pakistan appellant bench. (Suo motto of Federal Shariat Court VS Federation of Pakistan, 2006)

In the Rukhsana Bibi case, the Lahore High Court (LHC) ruled that clause 10 of the Pakistan Citizenship Act of 1951 is unlawful, unconstitutional, un-Islamic, and incompatible with article 25 of Pakistan's constitution of 1973. (Rukhsana Bibi VS Government of Pakistan etc, 2006)

Most recent cases that are currently sub judice before the Hon'ble Peshawar High Court on the same clause of the Pakistan Citizenship Act of 1951 to declare it incompatible with the Pakistani constitution, international agreements, as well as contradict with Islamic laws by relying on the Federal Shariat Court's Suo motto case. The most recent cases which are pending before the Peshawar High Court are under titles Saima & Others VS. Federation of Pakistan & Others, Jaweria Tanveer Versus Federation of Pakistan and others, Samina Roohi VS Government of Pakistan etc, Mst. Bas Raja & others Versus Ministry of Interior through Secretary Interior Government of Pakistan & 7 others, Hameeda & others Versus Federation of Pakistan & others, Jamala Bibi VS Federation of Pakistan and Others, Shazia Sadia VS Ministry of Interior etc, The Peshawar High Courts relied on the FSC's Suo motto case verdict in all of the aforementioned writs to declare that Clause 10 of the Pakistan Citizenship Act 1951 is illegal, unconstitutional, and biased against female citizens because it denies the fundamental rights of women and their children, contradicts Article 25 of the Pakistani Constitution, violates international obligations, as well as the fundamental precepts of Islam as enshrined in the Holy Quran and Traditions of the last messenger of Allah.

The impact of the Federal Shariat Court's decision/judgment:

In 2006, the Federal Shariat Court (FSC) proposed that the clause be changed by the federal government within six months of the order to grant Pakistani citizenship to the foreign national husband of the Pakistani female. The federal Shariat Court has ruled in his Suo motto against the prejudicial clause of the Pakistan Citizenship Act of 1951. As per to the Federal Shariat Court, it breaches international accords, contradicts Islamic law as set out in the Holy Qur'an and traditions of the last prophet of Allah, and is discriminatory toward women's basic rights. It also violates the article 2A and 25 of the 1973 constitution of the Islamic Republic of Pakistan. (Suo Motto of the Federal Shariat Court VS Federation of Pakistan, 2006)

The federal government appealed against the FSC's decision to the Supreme Court of Pakistan (SCP) on the grounds that it would raise divorce rates, unemployment, and threaten the integrity and sovereignty of the nation. Due to the appeal's pending status in Pakistan's Supreme Court since 2008, Any courts seeking declarations regarding their ability to rely on the Federal Shariat Court's (FSC) decision do not have legal standing because the court has the authority to interpret laws, but parliament has the power to amend laws. The only way possible to change such a provision in harmony with the constitution, international conventions, and Islamic law as established by the Holy Quran and Traditions is through legislative process.

Social implications of section 10 of the Pakistan Citizenship Act:

There are many foreigners living in Pakistan, and the majority of them have married Pakistani women, given birth to their children here in Pakistan, and eventually taken the form of families and communities. However, it is unfortunate that her foreign-born husband may fall ill or passes away while they are living in Pakistan. Following that, she and her children are living in extreme poverty and are faced with a variety of hardships on a social, legal, and financial level, among others. when their children has not been entitled for Pakistani nationality and where she does not know about the property, shelter and business of his foreign national husband in a foreign country or the country of the origin of her husband then how she can lead a pleasant life? The whole family's life is disturbed because she has married with foreign national.

Conclusion:

Everyone has a deep interest in citizenship and the rights to gain citizenship in the country of their preference. The majority of the nations can award citizenship by birth, marriage to a foreign national, immigration, etc. Pakistan also has these similar modalities of obtaining citizenship, although clause 10 of the Pakistan Citizenship Act 1951 is significantly more stringent, conservative, and unfair towards women. On the other hand, Islam accords citizenship to everyone, along with the requirement that they take an oath of allegiance and pacifically abide by local rules/laws. Pakistan needs to amend such provision of the Pakistan Citizenship Act 1951, to adopt it according to the world constitutions as well as to make it in order with the Islamic laws.

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