

Kashmiri Hindus and Atrocity Crimes: A Legal Brief on Persecution and Forced Displacement

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Key Findings

1. The report finds that the 19 January 1990 exodus was not migration but coerced displacement by terrorism; triggered by explicit killings, violent crimes, ultimatums, intimidation, and a terror environment that removed any realistic ability to stay.
2. It applies the core legal test of “genuine choice” and concludes that when civilians (Kashmiri Hindus in this case) flee under credible threat and coercion, the movement constitutes forced population transfer, not consent-based relocation.
3. The victim community was selected on inherited identity: Kashmiri Hindus were targeted and subjected to religion-based persecution, satisfying the identity element central to atrocity-crime analysis.
4. The report documents how targeted assassinations functioned as strategic signalling to terrorise and trigger dispersal from the Kashmir valley, with killings such as Tika Lal Taploo, Neelkanth Ganjoo and others presented as an early inflection point in the campaign.
5. It report highlights that sexual violence operated as a deliberate terror method, with emblematic cases (including Sarla Bhat and Girija Tickoo) demonstrating brutality used to accelerate displacement and collapse community security.
6. The terror campaign is assessed as sustained beyond the initial exodus, with later massacres and mass terror aimed at eliminating those who remained and deterring any return, including the report's treatment of Sangrampora, Wandhama, and Nadimarg as deterrence-by-slaughter events.
7. Forced displacement thus worked as durable demographic engineering: looting, arson, illegal occupation, “distress sales,” and cultural-religious erasure are assessed as mechanisms to convert dispersal into permanent dispossession and to structurally block return.
8. The report's legal finding is that; “ethnic cleansing” is not a standalone treaty offence, the conduct maps onto crimes against humanity, and distinguishes it from ordinary crimes and squarely puts it in the realm of gross human-rights violations and atrocity crimes.
9. The report finds that the terror campaign was executed by Pakistan through a layered network, armed terrorist organisations (JKLF, Pakistan-backed Hizbul Mujahideen, and Pakistan-based jihadist outfits such as Lashkar-e-Taiba and Jaish-e-Mohammed) complemented by “social” and separatist fronts that supplied ideological justification, propaganda, and facilitation
10. On attribution and responsibility, the report identifies a perpetrator ecosystem combining Pakistan-backed terror infrastructure with local Islamist mobilisation and “soft separatist” cover, local roles in downplaying/denying coercion, and argues that Pakistan's support engages doctrines of aiding/assisting and state responsibility; it closes by framing justice as recognition, accountability, and conditions enabling safe return and non-recurrence.

Ethnically Homogeneous Areas vs. Genocide

Ethnic cleansing refers to policies intended to create ethnically homogeneous areas by forcibly removing a targeted population. The term gained prominence in the 1990s (e.g. in the Yugoslav conflicts) and was described by a UN commission as “*rendering an area ethnically homogeneous by using force or intimidation to remove persons of given groups from the area*”. In essence, the core objective is removal of an ethnic or religious community from a region, typically through terror and violence, to alter the demographic composition.

Unlike genocide, *ethnic cleansing* is not formally codified as a distinct offence in international treaties. Instead, it is a descriptive term for a series of acts, including killings, forced displacement, etc. that constitute other international crimes (such as crimes against humanity, war crimes, and possibly genocide itself). This means perpetrators of ethnic cleansing are prosecuted under those overlapping crimes rather than under a standalone charge of “*ethnic cleansing*.” International tribunals have noted that campaigns of ethnic cleansing often involve “*violent and terror-inspiring means*” and can amount to crimes against humanity or even fall within the Genocide Convention's scope.

Both ethnic cleansing and genocide target a group, but their legal definitions differ in intent. Genocide, under the Genocide Convention, requires an intent to *physically destroy* a national, ethnic, racial or religious group, *in whole or in part*. Ethnic cleansing, by contrast, primarily seeks to *expel or remove* a group from a territory, not necessarily to exterminate every member (though extreme violence may be used). In practice the line can blur: “*murderous ethnic cleansing*” - where forcible expulsion is pursued via mass killings - may serve as a precursor or road to genocide. For example, scholars note that what was termed ethnic cleansing in Bosnia (1992-95) involved systematic massacres and ultimately genocide in places like Srebrenica. In legal forums, the distinction often hinges on specific intent: driving a population out (ethnic cleansing) versus eliminating the group itself (genocide). Nonetheless, both involve egregious atrocities and grave breaches of human rights.

In summary, the objective of the ethnic cleansing of Kashmiri Hindus was to “*purify*” the Kashmir Valley of its Hindu minority, creating a Muslim-only domain by terrorising and expelling the Hindus. This intent to establish an ethnically/religiously homogeneous area is what defines ethnic cleansing. As discussed below, the campaign's brutality (dozens of murders, rapes, and massacres) means it also took on the character of *murderous ethnic cleansing*, overlapping with genocidal acts and other international crimes.

Identity-Based Targeting

Targeted for Who They Were, Not What They Did. The victims of this cleansing were chosen solely for their ethnic-religious identity i.e. Kashmiri Hindus (also known as Kashmiri Pandits). They were not targeted because of any individual wrongdoing, but because they were Hindus, an ancestrally distinct minority in a now Muslim-majority region. Terrorist rhetoric openly framed them as the “other” that needed elimination or expulsion. For instance, Islamist terrorists declared the Kashmiri Hindus infidels and enemies of their envisioned Islamic order. Slogans echoing through the mosques in early 1990 told Hindus to “convert, leave, or die,” emphasising that inherited identity was the mark of the target, irrespective of personal politics or actions.

Systematic and Organized Campaign

The violence against Kashmiri Hindus was not random or sporadic; it was systematic, a calculated campaign rather than isolated hate crimes. Through late 1989 and early 1990, *targeted killings of prominent Hindus* (business persons, teachers, lawyers, intellectuals, professionals) signalled an organized effort to terrorise the community into flight. The Jammu Kashmir Liberation Front (JKLF), a terrorist outfit, kicked off the terror spree by assassinating individuals like Kashmiri Hindu leader Tika Lal Taploo in September 1989 and retired judge Neelkanth Ganjoo shortly thereafter. These early murders “*precipitated the 1990 exodus*” by spreading fear. Crucially, multiple attacks across different locations followed a common pattern and intent, which betrays a *coordinated policy*. Contemporary records and later analyses confirm that this was a *deliberate ethnic-cleansing policy* implemented by terrorist organizations, often with cross-border support - rather than random communal riots.

State or Quasi-State Backing

Unlike an unplanned mob uprising, the campaign enjoyed backing from organised terrorist groups functioning as quasi-state actors, some with direct support from Pakistan's Army and state agencies. Pakistan's military intelligence (ISI) was deeply involved in fomenting the anti-Hindu terror: many of the terrorist groups executing attacks were either created, sponsored or guided by Pakistani handlers. The JKLF, for example, had training and sanctuary in Pakistan-occupied Jammu and Kashmir; one JKLF assassin admitted he killed a Kashmiri Hindu journalist under *orders from the Pakistan-based JKLF leadership*. Similarly, the largest local terrorist outfit, Hizbul Mujahideen, functioned as an Islamist proxy of Pakistan (with ideological roots in Pakistani dictator Zia's Kashmir and Khalistan policy of bleeding India with a thousand cuts) and was “*Pakistan-backed*” by design. This support gave the campaign a para-state quality, effectively a form of state-enabled persecution. Such backing also meant the perpetrators had access to sophisticated arms, training camps, and a safe haven across the line of control in Pakistan occupied Jammu and Kashmir and larger Pakistan provinces, enabling a sustained and organized purge of the target community.

In sum, Kashmiri Hindus were *singled out as a group* for elimination from the Valley. Their persecution was **systematic**, orchestrated by terrorists and their sponsors as a matter of policy to cleanse Kashmir of its Hindu population. It's a textbook case of identity-based targeting: one community marked for expulsion purely due to religious/ethnic identity, with perpetrators acting in organized formations (often as proxies of a supporting state). **This distinguishes it from ordinary crimes and squarely puts it in the realm of gross human-rights violations and atrocity crimes.**

Methods and Tactics: Violence, Expulsion, and Erasure

The methods used to achieve the ethnic cleansing of Kashmiri Hindus mirror those recognised in other atrocity contexts and by the United Nations. They included extreme **physical violence**, terrorising threats leading to **forced exodus**, and deliberate **destruction of property and culture**.

What follows is a breakdown of these tactics; with emblematic examples illustrating each category:

- **Assassinations and Targeted Killings:** Terrorists systematically murdered members of the Kashmiri Hindu community as a primary tool of intimidation. Initial targets were often

prominent individuals, to send a loud message. For example, on 14 September 1989, *Tika Lal Taploo*, a well-known lawyer and political leader, was shot dead outside his home by JKLF terrorists, marking *the onset of targeted terror against Kashmiri Hindus*. In the ensuing months, dozens of Hindus were slain: Justice *Neelkanth Ganjoo* (who had sentenced a separatist leader) was gunned down in a Srinagar market, advocate *Prem Nath Bhat* was dragged out of his home and shot as a bloody warning to others, and government officials like *Lassa Koul* (TV station director) were assassinated after repeated threats. These were clearly planned executions, not random killings, intended to terrorise the entire community.

- **Brutal Violence and Rape:** The campaign featured heinous acts of physical violence designed to instill maximum fear. *Women were specifically targeted* for sexual violence, both as an expression of hatred and a tactic of humiliation to further drive the exodus. A horrifying example is the case of **Sarla Bhat**, a young nurse. On 19 April 1990, while on duty at a Srinagar hospital, she was *abducted by terrorists, gang-raped, and then gruesomely murdered*. This atrocity, coming at the height of the Kashmiri Hindu community's flight, is often cited as a trigger that convinced many families they had no future if they stayed. Equally horrific was the fate of **Girija Tickoo**, a 27-year-old school laboratory assistant: lured back to the Valley in June 1990 under the false pretext of pending dues, she was *kidnapped, gang-raped, and cut in half with a mechanical saw while still alive*. No one was ever punished for this depravity. Such gruesome crimes exemplify how *terror was inflicted through extreme cruelty*. They meet the threshold of what international law classifies as torture or inhumane acts when part of a systematic attack on a community.
- **Massacres and Mass Terror:** Beyond individual killings, terrorists perpetrated **mass killings of Hindus in their villages** to eliminate those who remained and to deter any thought of return. The **Sangrampora massacre** of March 1997 is emblematic: terrorists raided a small hamlet at night and *lined up and shot 7 Kashmiri Hindu (Pandit) villagers*, explicitly to send the message that any attempt by displaced Hindus to come back would be met with death. In January 1998, the **Wandhama massacre** saw 23 Kashmiri Hindus; men, women and children, brutally gunned down; jihadis disguised in Indian Army uniforms infiltrated the village and slaughtered nearly an entire community in one night. Later, in March 2003, the **Nadimarg massacre** occurred: 24 Hindus (again including women and small children) were rounded up and executed by terrorists posing as police; the Pakistan-based Lashkar-e-Taiba claimed responsibility for this carnage. These massacres highlighted that the cleansing campaign continued well beyond the initial 1990 exodus, aiming to "finish the job" and terrorise any remaining or returning minority families. The **deliberate targeting of civilians**, including children, in these attacks illustrates the ruthless tactics employed, acts which plainly constitute crimes against humanity (e.g. extermination) and war crimes.
- **Threats, Intimidation and Forced Exodus:** Alongside physical attacks, terrorists used widespread **threats and fear propaganda** to expel the Kashmiri Hindus. January 1990 saw an eruption of threatening slogans and notices. Through mosque loudspeakers and posted flyers, Islamists issued ultimatums to Kashmiri Hindus: "*leave the Valley, or face death.*" Mobs chanting "*Pakistan zindabad*" (long live Pakistan) and Islamic slogans roamed the streets, creating an atmosphere of siege. The night of 19 January 1990 was particularly infamous, hundreds of mosques reportedly broadcast synchronised calls for the Hindus to get out. This psychological warfare meant that by late January 1990, *tens of thousands of*

Kashmiri Hindus fled en masse, often with just the clothes on their backs. Families recall frantically packing whatever they could carry and abandoning ancestral homes overnight. Under international human rights law, when civilians flee under such coercion (threat of violence, intimidation), it is **not a voluntary migration** but a *forced displacement*. Indeed, tribunals have held that a “lack of genuine choice” inferred from threatening acts that make staying impossible, renders an exodus forced. In Kashmir, the Kashmiri Hindus had no genuine choice: by all accounts, staying meant imminent peril. Thus the **entire migration was effectuated by coercion**, satisfying the definition of forced population transfer as a crime. Years later, terrorists continued to issue threats to prevent resettlement attempts. The few Hindu families who stayed in 1990 often faced murder in the following years (several elderly Kashmiri Hindus who could not leave were later killed in cold blood).

- **Destruction and Looting of Property:** As is common in ethnic cleansing campaigns, the perpetrators sought not only to remove people but also to **erase the traces of their existence**. Thus, Kashmiri Hindu (Pandit) homes and properties were vandalised, torched, or illegally occupied. Many fleeing families saw their houses **looted and burnt** during or after the exodus. In numerous cases, neighbours or terrorists grabbed Pandit houses and lands. Displaced Kashmiri Hindus, fearful for their lives, were often forced to sell properties at throwaway prices (so-called “*distress sales*”) or found that fraudulent powers of attorney had been created to divest them. The net effect was to make the return of Kashmiri Hindus not only dangerous but materially difficult, their homes were no longer theirs. Alongside private properties, cultural and religious sites of the Kashmiri Hindus in Kashmir were attacked or fell into ruin. Reports exist of **temples being desecrated or damaged** in the years following the exodus, and of sacred images and libraries being destroyed. This cultural cleansing aimed to wipe out the community’s historical footprint. These tactics align with *UN-documented patterns of ethnic cleansing: “killing of civilians, rape, torture, destruction of civilian, public, and cultural property, looting and pillaging, and the forcible relocation of civilian populations”*. In Kashmir, every element of this grim catalogue was present.

The ethnic cleansing of Kashmiri Hindus was executed through a *combination of direct brutality and coercive terror*. Targeted assassinations and mass murders physically eliminated many and spread fear to the rest. Sexual violence was used as a weapon of terror. Threats and hate propaganda created a general climate of fear that compelled the population to flee en masse - a paradigmatic case of *forcible transfer of a civilian population*. Meanwhile, widespread looting, arson, and occupation of Pandit properties, as well as attacks on their cultural heritage, ensured that those who left had nothing to return to, thereby *consolidating the cleansing*. These acts were not random; they were part of an orchestrated effort to *destroy a community’s presence* in its homeland. Legally, each of these methods corresponds to grave breaches of human rights and humanitarian law, as will be detailed in the next section.

Below is a list of recorded killings of Kashmiri Hindus. The documented fatalities run into the thousands, while the wider harm; displacement, dispossession, and trauma extends to hundreds of thousands. Each entry is not a statistic but a case file: a grappling account of targeted persecution and the slow massacre of Kashmir’s Hindus.

Killings of Kashmiri Hindus (1989-2004) in the Kashmir Valley of Jammu and Kashmir

This table lists documented killings of Kashmiri Hindus from March 1989 through late 1990s (with notable incidents up to 2004). It includes the victim's name, date of killing, location (if known), brief details (how/by whom), the responsible terrorist group and whether the incident is recorded in official records.

S.No	Name of Victim	Date	Location	Details	Perpetrator / Group	Official Record
1	Prabhavati	14-Mar-1989	<i>Not available</i>	Killed by terrorists (scarce record in official files).	Terrorists (Islamist leanings)	Yes
2	Dina Nath Raina	15-Aug-1989	<i>Not available</i>	Killed by terrorists (scarce record in official files).	Terrorists (Islamist leanings)	Yes
3	Tika Lal Taploo	14-Sep-1989	Srinagar (Chinkra Mohalla)	Prominent lawyer & BJP leader shot outside his home by two JKLF gunmen. One assassin (Javed Mir) was identified as a JKLF terrorist. This killing marked the beginning of targeted terror against Kashmiri Hindus.	JKLF (Pakistan-supported leanings)	Yes
4	Smt. Sheela Tickoo	01-Nov-1989	Srinagar	Homemaker. Shot dead at her Srinagar residence (very limited official details).	Terrorists (JKLF cadre)	Yes
5	Neel Kanth Ganjoo	04-Nov-1989	Srinagar (Karan Nagar)	Retired judge (had sentenced JKLF founder Maqbool Bhat). Gunned down in a busy Srinagar market by masked terrorists tracking him since his return from Delhi. Assailants belonged to JKLF (Pakistani-ISI backed).	JKLF (Pakistan-supported)	Yes

6	Prem Nath Bhat	27-Dec-1989	Anantnag	Advocate and journalist. Dragged out of his home and shot multiple times by masked terrorists, leaving a blood-spattered warning for remaining Kashmiri Hindus.	JKLF(terrorists under ISI patronage)	Yes
7	M. L. Bhan	15-Jan-1990	Srinagar (Khonmoh)	Government employee, shot dead by terrorists near Srinagar (scarce official details).	Terrorists(Islamist leanings)	Yes
8	P. K. Kotru	19-Jan-1990	Srinagar (?)	Killed by terrorists (no further official details available).	Terrorists	Yes
9	Satish Kumar Tickoo	22-Jan-1990	Srinagar	Young businessman. Lured out of his home and shot dead by Farooq "Bitta" Karate, a JKLF terrorist who admitted this as his first murder. (This was one of at least 20 Kashmiri Hindus Bitta confessed to killing in 1990.)	JKLF(Pakistan-trained terrorist)	Yes
10	Tej Krishen Razdan	12-Feb-1990	Srinagar (Habba Kadal)	Government officer, shot by terrorists in Srinagar (limited details).	Terrorists	Yes
11	Lassa Koul	13-Feb-1990	Srinagar (Bemina)	Director, Doordarshan Kendra, Srinagar. Assassinated near his office - ambushed and shot in his car by JKLF terrorists after repeated threats. A JKLF member (Shaukat Bakshi) later admitted carrying out the hit on orders from Pakistan-based JKLF chief Amanullah Khan.	JKLF(terrorists backed by Pakistan)	Yes
12	Anil Bhan	16-Feb-1990	Srinagar	Govt. servant, killed by terrorists in Srinagar (scarce official records).	Terrorists	Yes

13	Ashok "Qazi" (Koul)	23-Feb-1990	Srinagar	Killed by terrorists (very limited record available).	Terrorists	Yes
14	Naveen Saproo	27-Feb-1990	Srinagar (Habba Kadal)	Government employee, shot by terrorists in Srinagar (scarce details in records).	Terrorists	Yes
15	P. N. Handoo	01-Mar-1990	Srinagar (Balgarden)	Information Dept. officer, shot dead by terrorists in Srinagar.	Terrorists	Yes
16	Jagar Nath	03-Mar-1990	Anantnag district	Government servant, killed by terrorists (scarce official detail).	Terrorists	Yes
17	Nirmala Raina	06-Mar-1990	Srinagar	Female civilian, killed by terrorists (details not in official files).	Terrorists	Yes
18	Kashi Nath	06-Mar-1990	Srinagar (Kathi Darwaza)	Retired employee, shot by terrorists in Srinagar (limited details).	Terrorists	Yes
19	Rattan Lal	10-Mar-1990	Kupwara (Lolab)	Killed by terrorists (scarce official details available).	Terrorists	Yes
20	T. K. Razdan	15-Mar-1990	Budgam (Yachgam)	Government servant, killed by terrorists (limited record).	Terrorists	Yes
21	A. K. Raina	19-Mar-1990	Srinagar	Govt. employee, shot by terrorists (scarce official detail).	Terrorists	Yes
22	B. K. Ganjoo	19-Mar-1990	Srinagar (Chotta Bazar)	Telecom engineer. Hiding in a rice bin at home when terrorists found and shot him ; his wife was tragically forced to kneel in his blood (as later recounted by locals - this horrific incident is often cited anecdotally). JKLF terrorists were active in the area (exact perpetrators unconfirmed).	Terrorists (suspected JKLF)	Yes
23	Gulshan Lal Raina	19-Mar-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes

24	Gulshan Lal Lamba	21-Mar-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
25	P. L. Fotedar	22-Mar-1990	Anantnag (Bijbehara)	Govt. servant, killed by terrorists (scarce official details).	Terrorists	Yes
26	Soom Nath Tickoo	23-Mar-1990	Srinagar (Ganderbal)	Government servant, killed by terrorists (scarce details).	Terrorists	Yes
27	B. L. Misri	23-Mar-1990	Srinagar (Peer Bagh)	Businessman, killed by terrorists (scarce official details).	Terrorists	Yes
28	Triloki Nath Ambardar	23-Mar-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
29	Bansi Lal	24-Mar-1990	<i>Not confirmed</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
30	A. K. Bazaz	26-Mar-1990	Srinagar (Safa Kadal)	Service employee, killed by terrorists (scarce details).	Terrorists	Yes
31	Prem Nath Koul	05-Apr-1990	Pulwama (Kuil)	Civilian, killed by terrorists (scarce official details).	Terrorists	Yes
32	Prem Nath Tickoo	05-Apr-1990	<i>Unknown</i>	(Possibly same as above Koul?) Killed by terrorists (record unclear - likely duplicate entry).	Unknown	No
33	K. K. Koul	05-Apr-1990	Srinagar	Businessman, killed by terrorists (scarce details).	Terrorists	Yes
34	Radha Krishan	05-Apr-1990	Srinagar (Karan Nagar)	Trader, shot by terrorists (scarce official details).	Terrorists	Yes
35	Ashok Kumar	06-Apr-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
36	H. L. Khera	10-Apr-1990	Srinagar/ Chandigarh	General Manager, HMT. Assassinated by JKLF terrorists (as per reports) in Srinagar.	JKLF(terrorists)	Yes
37	Rameesh (Ramesh) Peer	06-Apr-1990	Srinagar (Vichernag)	Govt. servant, killed by terrorists (scarce official details).	Terrorists	Yes
38	Kari Lal	09-Apr-1990	<i>Not available</i>	Killed by terrorists (scarce record in official files).	Terrorists	No

39	Makhan Lal Wanganoo	10-Apr-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
40	Sarla Bhat	19-Apr-1990	Anantnag (Qazi Mohalla)	Nurse at SKIMS hospital. Abducted while on duty and brutally gang-raped , then murdered by terrorists on the night of 19 Jan 1990 (often cited as a trigger for Pandit exodus). <i>(Her case, like many, saw no convictions.)</i>	Pakistan-backed terrorists (exact group unknown)	Yes
41	Makhan Lal (another)	21-Apr-1990	Srinagar (Kani Kadal)	Businessman, killed by terrorists (scarce details).	Terrorists	Yes
42	Sushil Kumar Kotru	23-Apr-1990	Srinagar (Rainawari)	Young professional, shot dead by terrorists in Srinagar (both he and entry #45 refer to the same victim).	Terrorists	Yes
43	Niranjan Nath	24-Apr-1990	Anantnag (Akingam)	Businessman, killed by terrorists (scarce official details).	Terrorists	Yes
44	Bansi Lal Saproo	24-Apr-1990	Srinagar (Gulab Bagh)	Killed by terrorists (scarce official details).	Terrorists	Yes
45	Narendra Nath	24-Apr-1990	Srinagar (Rainawari)	Killed by terrorists (scarce official details).	Terrorists	Yes
46	Ravinder Kr. Pandit	25-Apr-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
47	Kashi Ram	25-Apr-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
48	Bhushan Lal	26-Apr-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
49	Dr. Raj Nath	26-Apr-1990	Srinagar (New Khanda)	Medical doctor, shot by terrorists (scarce details).	Terrorists	Yes
50	Brij Nath	26-Apr-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes

51	Raj Nath Raina	26-Apr-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
52	Bansi Lal (2)	27/28-Apr-1990	Anantnag (Chattergul)	Businessman, killed by terrorists (scarce details).	Terrorists	Yes
53	Bharat Bhushan	27/28-Apr-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
54	Predhiman Krishan Bhat	28-Apr-1990	Kupwara (Lolab)	Killed by terrorists (scarce official details).	Terrorists	Yes
55	Gushi Lal	29-Apr-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
56	M. L. Pandita	29-Apr-1990	Kupwara (Agri)	Govt. employee, killed by terrorists (scarce details).	Terrorists	Yes
57	Dileep Kumar	30-Apr-1990	Srinagar (Nowhatta)	Government servant, shot by terrorists in downtown Srinagar.	Terrorists	Yes
58	Heera Lal Khar	30-Apr-1990	Srinagar (Kak Mohalla)	Killed brutally by terrorists (scarce official details).	Terrorists	Yes
59	Dawarika Nath	01-May-1990	Anantnag (Kulgam)	Killed by terrorists (scarce official details).	Terrorists	Yes
60	Sarwanand Koul “Premi”	01-May-1990	Anantnag (Soaf Shalli)	60-year-old poet & retired teacher. Kidnapped from his village along with his son, held overnight and shot dead the next day; terrorists also placed nails in their bodies as an atrocity. (His house was then set ablaze.) This gruesome murder sent shockwaves through the community.	Hizbul Mujahideen terrorists (suspected)	Yes
61	Virender (Kumar) Premi	01-May-1990	Anantnag (Soaf Shalli)	27-year-old son of Sarwanand. Abducted and killed alongside his father by the same terrorists on 1 May 1990.	Hizbul Mujahideen (suspected cell)	Yes

62	Chuni Lal Shalla	02-May-1990	Kupwara	Killed by terrorists (scarce official details).	Terrorists	Yes
63	Makhan Lal Thaploo	02-May-1990	Anantnag	Businessman, killed by terrorists (scarce official details).	Terrorists	Yes
64	Prof. K. L. Ganju	02/03-May-1990	Sopore	College professor, kidnapped and shot dead by terrorists.	Terrorists	Yes
65	Smt. Prana Ganjoo	02/03-May-1990	Sopore	Wife of Prof. Ganju. Kidnapped, raped and murdered by terrorists alongside her husband.	Terrorists	Yes
66	Vinod Kr. Chatta	03-May-1990	Baramulla	Government employee, killed by terrorists (scarce details).	Terrorists	Yes
67	Vinod Kumar	03-May-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
68	Daya Krishen	03-May-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
69	Surind (Surinder) Chand	04-May-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
70	Mohan Lal Bhat	04-May-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
71	Ramesh Kr. Raina	05-May-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
72	Surinder Dhar	05-May-1990	Srinagar (Habba Kadal)	Government servant, shot by terrorists (scarce details).	Terrorists	Yes
73	Vinod Kumar	06-May-1990	Srinagar (Nowhatta)	Shot dead by terrorists in Srinagar on 6 May 1990.	Terrorists	Yes
74	Kundan Lal Ganjoo	07-May-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
75	Dolly (child)	07-May-1990	Srinagar (Karan Nagar)	A young girl, killed by terrorists (one of several children killed in 1990; very scarce records).	Terrorists	Yes

76	Bihari Lal Labroo	09-May-1990	Anantnag	Killed by terrorists (scarce official details).	Terrorists	Yes
77	Rattan Lal	10-May-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
78	Babli Raina (female)	10-May-1990	Srinagar	Young woman, killed by terrorists (scarce official details).	Terrorists	Yes
79	Surinder Kumar	10-May-1990	Srinagar (Tulmulla)	Employee, shot by terrorists (scarce official details).	Terrorists	Yes
80	Moti Lal Bhat	10-May-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
81	Amar Nath Bagati	11-May-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
82	Omkar Nath	11-May-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
83	Poshkar Nath	11-May-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
84	Mohan Lal	13-May-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
85	Inderjeet	13-May-1990	Budgam (Chadura)	Trader, shot by terrorists (scarce details).	Terrorists	Yes
86	“Veer Ji” (Vaid Ji) Bhat	13-May-1990	Budgam	Healer/medic, killed by terrorists (scarce official details).	Terrorists	Yes
87	Ashok Kumar	13-May-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
88	Bhushan Lal	13-May-1990	Budgam	Killed by terrorists (scarce official details).	Terrorists	Yes
89	Daya Krishen Dullo	13-May-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
90	Man Mohan Sharma	15-May-1990	Baramulla	Killed by terrorists (scarce official details).	Terrorists	Yes
91	Saroop Nath	15-May-1990	Anantnag (Vanpoh)	Killed by terrorists (scarce official details).	Terrorists	Yes
92	A. K. Wazir	15-May-1990	Srinagar	Government officer, killed by terrorists (scarce details).	Terrorists	Yes
93	Bhushan Lal Koul	16-May-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes

94	Sham Lal Sharma	17-May-1990	Anantnag (Vanpoh)	Killed by terrorists (scarce official details).	Terrorists	Yes
95	Chuni Lal	17-May-1990	Srinagar (Habba Kadal)	Shopkeeper, shot by terrorists (scarce details).	Terrorists	Yes
96	Suresh Kr. Kissu	17-May-1990	Srinagar (Purshiyar)	Government employee, killed by terrorists (scarce details).	Terrorists	Yes
97	Manmohan Bachloo	18-May-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
98	Jiya Lal Kaw	18-May-1990	Handwara (Kupwara)	Kidnapped and killed by terrorists (body found later).	Terrorists	Yes
99	<i>Minor (unnamed)</i>	18-May-1990	Handwara (Kupwara)	A minor son of J. L. Kaw was also killed by the terrorists in the same incident.	Terrorists	Yes
100	Dileep Kumar	19-May-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
101	Moti Lal Raina	20-May-1990	Srinagar (Rainawari)	Killed by terrorists (scarce official details).	Terrorists	Yes
102	Dileep “Ji”	21-May-1990	Anantnag	Civilian, killed by terrorists (scarce official details).	Terrorists	Yes
103	Prithvi Nath Hakim	21-May-1990	Srinagar (Nowgam)	Businessman, killed by terrorists (scarce official details).	Terrorists	Yes
104	Chaman Lal Pandit	22-May-1990	Anantnag	Killed by terrorists (scarce official details).	Terrorists	Yes
105	Shambu Nath	24-May-1990	Anantnag	Killed by terrorists (scarce official details).	Terrorists	Yes
106	Bansi Lal Sharma	24-May-1990	Anantnag	Killed by terrorists (scarce official details).	Terrorists	Yes
107	Shanker Dass	26-May-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
108	Chaman Lal Tickoo	28-May-1990	Srinagar (Ganderbal)	Government servant, killed by terrorists (scarce details).	Terrorists	Yes
109	Seema (alias “Babli”)	28-May-1990	Srinagar	Young woman, killed by terrorists (scarce official details).	Terrorists	Yes

110	Maharaj Krishen	30-May-1990	<i>Not available</i>	Killed by terrorists (scarce official details). Retired engineer and human-rights activist. Assassinated on his way to work - shot by gunmen from a passing vehicle. (Note: H.N. Wanchoo's murder is controversial; while initially blamed on terrorists, later evidence hinted security agencies 'involvement. Case remains unsolved.)	Terrorists	Yes
111	Jawahir Lal Wanchoo	30-May-1990	Srinagar (Rainawari)	Killed by terrorists (scarce official details). Retired engineer and human-rights activist. Assassinated on his way to work - shot by gunmen from a passing vehicle. (Note: H.N. Wanchoo's murder is controversial; while initially blamed on terrorists, later evidence hinted security agencies 'involvement. Case remains unsolved.)	Unidentified gunmen (case unsolved)	Yes
112	Krishan Lal Wagroo	31-May-1990	Budgam	Government officer, killed by terrorists (scarce official details).	Terrorists	Yes
113	Avtar Krishen	31-May-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
114	Jagar Nath	31-May-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
115	Ramesh Kumar	01-Jun-1990	Anantnag (migrant from Jammu)	Migrant who returned to Valley, shot by terrorists (scarce details).	Terrorists	Yes
116	Kanaya Lal Bhat	01-Jun-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
117	Badri Nath	02-Jun-1990	Anantnag (Gosani Gund)	Govt. servant, killed by terrorists (scarce details).	Terrorists	Yes
118	Damodhar Raina	02-Jun-1990	Anantnag (Kulgam)	Retired employee, kidnapped and killed by terrorists.	Terrorists	Yes
119	Satish Lal Kalla	03-Jun-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
120	Shiban Krishen Kulla	03-Jun-1990	Srinagar (Bagh Mehtab)	Govt. servant, killed by terrorists (scarce details).	Terrorists	Yes
121	Aftab Ram	04-Jun-1990	Srinagar (Rainawari)	Retired employee, killed by terrorists (scarce details).	Terrorists	Yes
122	Gokal Nath	04-Jun-1990	Srinagar (Bagh Mehtab)	Retired employee, killed by terrorists (scarce details).	Terrorists	Yes

123	Radha Krishan (Patwari)	06-Jun-1990	Anantnag (Turoo)	Patwari (land official), shot by terrorists (scarce details).	Terrorists	Yes
124	Jawahir Lal Bhat	06-Jun-1990	Anantnag	Killed by terrorists (scarce official details).	Terrorists	Yes
125	Ramesh Kr. Raina	07-Jun-1990	Anantnag	Government employee, killed by terrorists (scarce details).	Terrorists	Yes
126	Raj Kr. Jailkhani	07-Jun-1990	Srinagar (Zero Bridge)	Government employee, killed by terrorists (scarce details).	Terrorists	Yes
127	Sham Lal	07-Jun-1990	Srinagar (Lal Mandi)	Shopkeeper, killed by terrorists (scarce details).	Terrorists	Yes
128	Radha Krishan	07-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
129	Smt. Girija Tickoo	11-Jun-1990	Bandipora area	27-year-old lab assistant. Brutally gang-raped and cut in half with a mechanical saw while still alive. She had briefly returned to collect her salary when she was kidnapped. Her rape-murder remains one of the most horrific atrocities; no one was ever brought to justice.	Islamic terrorists (Pakistan-sponsored leanings)	Yes
130	Inder Kumar	11-Jun-1990	Srinagar	Government servant, killed by terrorists (scarce details).	Terrorists	Yes
131	Kanaya Lal	11-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
132	Soom Nath	11-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
133	Ashok Kr. Pandita	12-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
134	Kanya Lal	12-Jun-1990	Budgam (hanged)	Government employee, found hanging after abduction by terrorists.	Terrorists	Yes
135	Triloki Nath	12-Jun-1990	Srinagar (Maharaj Gunj)	Petition writer. Dead body found in a market after abduction.	Terrorists	Yes
136	Chuni Lal	13-Jun-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes

137	Dayaram Koul	13-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
138	Rugh Nath	14-Jun-1990	Pulwama	Government employee, killed by terrorists (scarce details).	Terrorists	Yes
139	A. K. Safaya	15-Jun-1990	Srinagar (Habba Kadal)	Bank manager, assassinated by terrorists (shot on way to work).	Terrorists	Yes
140	Ram Chand	15-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
141	Saroop Nath	16-Jun-1990	Pulwama	Killed by terrorists (scarce official details).	Terrorists	Yes
142	Gopi Chand	17-Jun-1990	Kupwara	Killed by terrorists (scarce official details).	Terrorists	Yes
143	Badri Nath Koul	18-Jun-1990	Srinagar (Bana Mohalla)	Government servant, killed by terrorists (scarce details).	Terrorists	Yes
144	Jawahir Lal Ganjoo	18-Jun-1990	Srinagar (Bana Mohalla)	Government servant, shot by terrorists at home.	Terrorists	Yes
145	Smt. Prana Ganjoo	18-Jun-1990	Srinagar (Bana Mohalla)	Elderly lady, killed by terrorists (same incident as J. L. Ganjoo).	Terrorists	Yes
146	Smt. Durga Koul	18-Jun-1990	Srinagar (Bana Mohalla)	Elderly lady, killed by terrorists (same incident as above).	Terrorists	Yes
147	Tej Krishan Pandit	19-Jun-1990	Srinagar	Government officer. Abducted and shot dead by terrorists on 19 June 1990 (the last Pandit killing before the bulk exodus).	Terrorists	Yes
148	Rajinder Kr. Tickoo	20-Jun-1990	Shopian (Pulwama)	Shopkeeper, killed by terrorists (scarce official details).	Terrorists	Yes
149	Sanjay Thusoo	21-Jun-1990	Kupwara (Trehgam)	Government servant, killed by terrorists (scarce details).	Terrorists	Yes
150	Smt. Gigari (Gagri)	22-Jun-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
151	Bal Krishen Tatoo	22-Jun-1990	Srinagar (Habba Kadal)	Killed by terrorists (scarce details).	Terrorists	Yes
152	Baljee (Balji)	22-Jun-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes

153	Makhan Lal Raina	22-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
154	M. L. Bhat	22/23-Jun-1990	Anantnag	Government employee, killed by terrorists (overnight, scarce details).	Terrorists	Yes
155	Ashok Kumar	23-Jun-1990	Srinagar (Khankah-e-Sokhta)	Killed by terrorists (scarce official details).	Terrorists	Yes
156	Prithvi Nath Tickoo	23-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
157	Ashwani Kumar	23-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
158	Ashok Kr. Kotha	24-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
159	Soom Nath Koul	24-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
160	Badri Nath Wattal	25-Jun-1990	Srinagar (Rainawari)	Government employee, killed by terrorists (scarce details).	Terrorists	Yes
161	Brij Lal Raina	26-Jun-1990	Budgam (Dambidoola)	Revenue official, killed by terrorists (scarce details).	Terrorists	Yes
162	Satish Kumar	26-Jun-1990	Srinagar (Ganderbal)	Government employee, killed by terrorists (scarce details).	Terrorists	Yes
163	Gopal Nath	26-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
164	Ramesh Razdan	26-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
165	T. N. Raina	26-Jun-1990	Srinagar	Joint Director, Sericulture Dept. Assassinated by terrorists (shot on way to office).	Terrorists	Yes
166	Yogesh Kumar	26-Jun-1990	Srinagar (Rambagh)	Killed by terrorists (scarce official details).	Terrorists	Yes
167	Gopi Nath Raina	26-Jun-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes

168	Smt. "Babli" (Babli Akhoon)	28-Jun-1990	Srinagar (Kawdara)	Kashmiri Hindu woman, shot dead ; bullet-ridden body found on street.	Terrorists	Yes
169	Smt. Roopawati	28-Jun-1990	Pulwama (Drusu)	Mother of Babli (above). Shot dead alongside her daughter by the same attackers.	Terrorists	Yes
170	Vivek Labroo ("Shabajee")	29-Jun-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
171	Omkar Nath Mattoo	30-Jun-1990	Pulwama (Dragbal, Pampore)	Killed by terrorists (scarce official details).	Terrorists	Yes
172	Prof. Neel Kant Raina	30-Jun-1990	Srinagar	Professor, killed by terrorists (scarce official details).	Terrorists	Yes
173	Rajinder	30-Jun-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
174	Triloki Nath	01-Jul-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
175	N. G. Sadhu	01-Jul-1990	Kulgam (Manzgam)	Killed by terrorists (scarce official details).	Terrorists	Yes
176	Dina Nath	01-Jul-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
177	Raj Nath Dhar	01-Jul-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
178	Smt. Girja Dhar	01-Jul-1990	Srinagar (Ali Kadal)	Housewife, killed by terrorists (scarce details).	Terrorists	Yes
179	Smt. Teja Dhar	01-Jul-1990	Srinagar (Ali Kadal)	Housewife, killed by terrorists (same incident as Girja Dhar).	Terrorists	Yes
180	Predhiman Krishan	02-Jul-1990	Anantnag (Kokernag)	Killed by terrorists (scarce official details).	Terrorists	Yes
181	Smt. Arandatti	02-Jul-1990	Srinagar (Batyar)	Woman, killed by terrorists (scarce official details).	Terrorists	Yes
182	Makhan Lal	03-Jul-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
183	Mohan Lal	03-Jul-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes

184	Satish Kumar	06-Jul-1990	Baramulla	Killed by terrorists (scarce official details).	Terrorists	Yes
185	Jawahir Lal Bhat	06-Jul-1990	Baramulla	Killed by terrorists (scarce official details).	Terrorists	Yes
186	Gopi Nath Raina	07-Jul-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
187	Dina Nath Mujoo	07-Jul-1990	Srinagar (Rawalpora)	Retired official, shot dead by terrorists near his home.	Terrorists	Yes
188	Shiban Koul	08-Jul-1990	Baramulla (Tangmarg)	Businessman, killed by terrorists (scarce official details).	Terrorists	Yes
189	Gouri Shanker	09-Jul-1990	Baramulla	Killed by terrorists (scarce official details).	Terrorists	Yes
190	Avtar Krishan	09-Jul-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
191	Inder Krishan	10-Jul-1990	Srinagar (Mehjoor Nagar)	Killed by terrorists (scarce official details).	Terrorists	Yes
192	Shambu Nath	11-Jul-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
193	Inder Kumar	11-Jul-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
194	Nanaji (nickname)	11-Jul-1990	Srinagar	Elderly man, killed by terrorists (scarce official details).	Terrorists	Yes
195	Shiban Lal Koul	11-Jul-1990	Anantnag (Ashmuji)	Killed by terrorists (scarce official details).	Terrorists	Yes
196	Jiwan Lal	15-Jul-1990	Srinagar (Rainawari)	Killed by terrorists (scarce official details).	Terrorists	Yes
197	Bishambar Nath Koul	15/16-Jul-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
198	Radha Krishan Koul	15/16-Jul-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
199	Vaid Prakesh Koul	16-Jul-1990	Srinagar	Village doctor (vaid), killed by terrorists (scarce details).	Terrorists	Yes
200	Brij Nath Koul	16-Jul-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
201	Anand Narayan	17-Jul-1990	Anantnag	Killed by terrorists (scarce official details).	Terrorists	Yes

202	Chand Ram Kher	17-Jul-1990	Anantnag (Damjan)	Government employee, killed by terrorists (scarce details).	Terrorists	Yes
203	Dr. Soni (Soni Pandita)	18-Jul-1990	<i>Not available</i>	Lady doctor, killed by terrorists (scarce official details).	Terrorists	Yes
204	Janki Nath	20-Jul-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
205	Nath Ji	26-Jul-1990	Anantnag	Killed by terrorists (scarce official details).	Terrorists	Yes
206	Vaid Lal	26-Jul-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
207	Gouri Shanker	29-Jul-1990	Baramulla	Killed by terrorists (scarce official details).	Terrorists	Yes
208	Adarsh Jee	29-Jul-1990	Baramulla	Killed by terrorists (scarce official details).	Terrorists	Yes
209	Jai Krishan	02-Aug-1990	Srinagar (Dribyar)	Killed by terrorists (scarce official details).	Terrorists	Yes
210	Ram Nath Bhat	06-Aug-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
211	R. K. Handoo	09-Aug-1990	Srinagar (Rainawari)	MES engineer, assassinated by terrorists (scarce details).	Terrorists	Yes
212	Saroop Narayan	10-Aug-1990	Baramulla (Pattan)	Killed by terrorists (scarce official details).	Terrorists	Yes
213	Manoj Kumar	10-Aug-1990	Kupwara	Killed by terrorists (scarce official details).	Terrorists	Yes
214	Prithvi Nath Bali	10-Aug-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
215	Vasudev Pandit	11-Aug-1990	Anantnag (Rohama)	Killed by terrorists (scarce official details).	Terrorists	Yes
216	D. N. Choudhary	11-Aug-1990	Srinagar (Indra Nagar)	Cement Factory manager, kidnapped and killed by terrorists (scarce details).	Terrorists	Yes
217	Roshan Lal Chowdhary	11-Aug-1990	Srinagar (Rainawari)	Killed by terrorists (scarce official details).	Terrorists	Yes
218	Autar Krishen Pandita	12-Aug-1990	Anantnag	Killed by terrorists (scarce official details).	Terrorists	Yes
219	Darshan Koul	15-Aug-1990	Anantnag (Kokernag)	Killed by terrorists (scarce official details).	Terrorists	Yes

220	Masher Nath	16-Aug-1990	Kupwara (Lolab)	Killed by terrorists (scarce official details).	Terrorists	Yes
221	Rattan Lal Raina	18-Aug-1990	<i>Not available</i>	Bank employee, killed by terrorists (scarce details).	Terrorists	Yes
222	Shanker Nath Tiku	21-Aug-1990	Budgam (Wadwan)	Killed by terrorists (scarce official details).	Terrorists	Yes
223	Bansi Lal Raina	28-Aug-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
224	Omkar Nath Koul	29-Aug-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
225	Shadi Lal Bhat	04-Sep-1990	Anantnag (Pahalgam)	Murdered by terrorists, body found in Lidder river.	Terrorists	Yes
226	Prithvi Nath	05/06-Sep-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
227	Makhan Lal	08-Sep-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
228	Hiday Nath	09-Sep-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
229	Gouri Shanker	10-Sep-1990	Ganderbal	Killed by terrorists (scarce official details).	Terrorists	Yes
230	Smt. Trika Ji	10-Sep-1990	Ganderbal	Kashmiri Hindu lady, killed by terrorists (scarce details).	Terrorists	Yes
231	Triloki Nath	11-Sep-1990	Anantnag	Killed by terrorists (scarce official details).	Terrorists	Yes
232	Ramesh Kumar	12-Sep-1990	Pulwama (Khrew)	Killed by terrorists (scarce official details).	Terrorists	Yes
233	Avtar Krishen	12/13-Sep-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
234	Dawarika Nath	13-Sep-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
235	Avtar Krishan Raina	14-Sep-1990	Anantnag (Chawalgam)	Killed by terrorists (scarce official details).	Terrorists	Yes
236	Rattan Lal Pandita	17-Sep-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
237	Pairay Lal Raina	23-Sep-1990	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes

238	Durga Prasad	05-Oct-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
239	D. P. Khazanchi	06-Oct-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
240	Jagar Nath	07-Oct-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
241	Zind Lal	07-Oct-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
242	Jagar Nath Pandita	07-Oct-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
243	Poshkar Nath Razdan	12-Oct-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
244	Smt. Usha Ji	14-Oct-1990	Srinagar	Kashmiri Pandit woman, shot dead in a mass killing.	Islamist terrorists	Yes
245	Dr. Shiban Ji Khirdi	14-Oct-1990	Srinagar	Physician, killed by terrorists (same incident as Usha Ji; part of a massacre of 14-Oct-1990 in Srinagar).	Islamist terrorists	Yes
246	Rajinder Koul	14-Oct-1990	Srinagar	Killed by terrorists (14-Oct-1990 massacre, scarce details).	Islamist terrorists	Yes
247	Satish (Satish) Koul	14-Oct-1990	Srinagar	Killed by terrorists (14-Oct-1990 massacre).	Islamist terrorists	Yes
248	Smt. Neeta Ji	14-Oct-1990	Srinagar	Kashmiri Pandit woman, killed by terrorists (14-Oct massacre).	Islamist terrorists	Yes
249	Smt. Nancy Koul	14-Oct-1990	Srinagar	Kashmiri Pandit woman, killed by terrorists (14-Oct massacre).	Islamist terrorists	Yes
250	Radha Krishen Bhat	15-Oct-1990	Srinagar	Civilian, killed by terrorists (scarce official details).	Terrorists	Yes
251	Makhan Lal Bhat	17-Oct-1990	Srinagar	Civilian, killed by terrorists (scarce official details).	Terrorists	Yes

252	Prem Nath Bhat	17-Oct-1990	Anantnag (Dangarpora)	Prominent Pandit and activist, shot dead by terrorists while visiting his native village. (This is a second P.N. Bhat, not the one killed in 1989.)	Terrorists	Yes
253	Poshker Nath	18-Oct-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
254	Smt. Pinki Koul	09-Nov-1990	<i>Not available</i>	Kashmiri Pandit woman, killed by terrorists (scarce details).	Terrorists	Yes
255	Mohan Lal Koul	19-Nov-1990	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
256	Omkar Nath Wali	02-Jan-1991	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
257	Baldev Raj Dutta	19-Jan-1991	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
258	Madan Mohan	11-Jun-1991	Sopore	Killed by terrorists (scarce official details).	Terrorists	Yes
259	Kashi Nath Koul	13-Jun-1991	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
260	“Nanajee” (nickname)	13-Jun-1991	<i>Not available</i>	Elderly Pandit, killed by terrorists (scarce details).	Terrorists	Yes
261	Smt. Rohini	22-Jun-1991	Srinagar	Kashmiri Pandit woman, killed by terrorists (scarce official details). (Same Rohini as entry 172, duplicate.)	Terrorists	Yes
262	Mohan Lal Mattoo	01-Jul-1991	Srinagar	Killed by terrorists (scarce official details).	Terrorists	Yes
263	Smt. Vijay Bhat	31-Jul-1991	Srinagar	Kashmiri Pandit woman, killed by terrorists (scarce details).	Terrorists	Yes
264	Surinder Kumar	26-Aug-1991	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
265	Mohan Lal	08-Oct-1991	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes

266	Ramesh Kumar	09-Oct-1991	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
267	Poshkar Nath	12-Oct-1991	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
268	Mehesher Nath	15-Oct-1991	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
269	Sham Lal “Pandith”	15-Oct-1991	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
270	Kanhaya Lal Peshin	18-Oct-1991	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
271	Kanaya Lal	19-Oct-1991	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
272	Janki Nath Koul	14-Dec-1991	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
273	Archana Braroo (female)	30-Mar-1992	Srinagar	Kashmiri Pandit woman, killed by terrorists (scarce details).	Terrorists	Yes
274	Smt. Bimala Braroo	30-Mar-1992	Srinagar	Kashmiri Pandit woman, killed by terrorists (same incident as above).	Terrorists	Yes
275	Sohan Lal Braroo	30-Mar-1992	Srinagar	Killed by terrorists (same incident as above).	Terrorists	Yes
276	Rattan Lal Hali	20-May-1992	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
277	Dura Nath “Rafiz”	03-Jun-1992	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
278	Chaman Lal Koul	11-Oct-1992	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
279	Soom Nath Raina	11-Oct-1992	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes

280	H. N. Wanchoo	05-Dec-1992	Srinagar	Prominent human-rights activist compiling Pandit killings. Assassinated by gunmen in Srinagar. (While initially attributed to terrorists, many suspect this high-profile murder was orchestrated to silence his documentation of human rights abuses.) No one was convicted.	Unidentified (disputed : terrorists or others)	Yes
281	Smt. Asha Pandit	29-Dec-1992	<i>Not available</i>	Kashmiri Pandit woman, killed by terrorists (scarce details).	Terrorists	Yes
282	Tej Krishen (unknown surname)	12-Feb-1993	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
283	Prem Nath Bhat	06-Jun-1993	<i>Not available</i>	Killed by terrorists (scarce official details). (<i>Possibly a namesake, unrelated to earlier entries.</i>)	Terrorists	Yes
284	Jagar Nath	06-Jul-1993	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
285	Neel Kant Lala	25-Jul-1993	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
286	Kanya Lal Dudha	14-Aug-1993	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
287	Avtar Krishen	24-Oct-1993	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
288	Pradeep Kumar Bhat	28-Jan-1994	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
289	Sanjay Kumar (“Chako”)	10-May-1994	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes
290	Piyar Lal Raina	13-Jul-1994	<i>Not available</i>	Killed by terrorists (scarce official details).	Terrorists	Yes

291	Tej Krishen Bhat	03-Dec-1994	Not available	Killed by terrorists (scarce official details).	Terrorists	Yes
292	Sona Ram	25-Jul-1995	Not available	Killed by terrorists (scarce official details).	Terrorists	Yes
293	Chuni Lal Bhat	12-May-1996	Not available	Killed by terrorists (scarce official details).	Terrorists	Yes
294	Raj Nath	05-Jun-1996	Not available	Killed by terrorists (scarce official details).	Terrorists	Yes
295	Avtar Krishan Pandita	21-Mar-1997	Budgam (Sangrampora)	<i>One of 7 Pandit villagers massacred</i> at Sangrampora, Budgam on 21 March 1997. Terrorists barged in at night, lined up male villagers and shot them dead. This massacre was intended to deter displaced Kashmiri Hindus from returning.	Hizbul Mujahideen (suspected; case untraced)	Yes
296	Bhushan Lal Bhat	21-Mar-1997	Budgam (Sangrampora)	Killed in the Sangrampora massacre (see entry 327).	Hizbul Mujahideen (suspected)	Yes
297	Dileep (Dilip) Bhat	21-Mar-1997	Budgam (Sangrampora)	Killed in the Sangrampora massacre (see entry 327).	Hizbul Mujahideen (suspected)	Yes
298	Pairay Lal Pandit	21-Mar-1997	Budgam (Sangrampora)	Killed in the Sangrampora massacre (see entry 327).	Hizbul Mujahideen (suspected)	Yes
299	Sanjay Bhat	21-Mar-1997	Budgam (Sangrampora)	Killed in the Sangrampora massacre (see entry 327).	Hizbul Mujahideen (suspected)	Yes
300	Triloki Nath	21-Mar-1997	Budgam (Sangrampora)	Killed in the Sangrampora massacre (see entry 327).	Hizbul Mujahideen (suspected)	Yes
301	Vijay Bhat	21-Mar-1997	Budgam (Sangrampora)	Killed in the Sangrampora massacre (see entry 327).	Hizbul Mujahideen (suspected)	Yes

302	Akshay Kumar	25-Jan-1998	Ganderbal (Wandhama)	Massacred by terrorists in the Wandhama massacre on 25-26 Jan 1998. That night, 23 Kashmiri Hindus (men, women & children) of Wandhama village were shot dead by armed leanings disguised in Army uniforms. Lashkar-e-Taiba terrorists were blamed for this carnage.	Lashkar-e-Taiba (Pakistan-based terror group)	Yes
303	Badri Nath	25-Jan-1998	Ganderbal (Wandhama)	Victim of Wandhama massacre (see entry 334).	Lashkar-e-Taiba (Pakistani terrorist group)	Yes
304	Jyoti (child)	25-Jan-1998	Ganderbal (Wandhama)	Young girl, victim of Wandhama massacre (see entry 334).	Lashkar-e-Taiba	Yes
305	Kashi Nath	25-Jan-1998	Ganderbal (Wandhama)	Victim of Wandhama massacre (see entry 334).	Lashkar-e-Taiba	Yes
306	Meenakshi (child)	25-Jan-1998	Ganderbal (Wandhama)	Young girl, victim of Wandhama massacre .	Lashkar-e-Taiba	Yes
307	Moti Lal Bhat	25-Jan-1998	Ganderbal (Wandhama)	Victim of Wandhama massacre .	Lashkar-e-Taiba	Yes
308	Rakesh Kumar	25-Jan-1998	Ganderbal (Wandhama)	Victim of Wandhama massacre .	Lashkar-e-Taiba	Yes
309	Sanjay Kumar Bhat	25-Jan-1998	Ganderbal (Wandhama)	Victim of Wandhama massacre .	Lashkar-e-Taiba	Yes
310	Sarika(chil d)	25-Jan-1998	Ganderbal (Wandhama)	Young girl, victim of Wandhama massacre .	Lashkar-e-Taiba	Yes
311	Sarla Kumari	25-Jan-1998	Ganderbal (Wandhama)	Young woman, victim of Wandhama massacre .	Lashkar-e-Taiba	Yes
312	Seema Kumari	25-Jan-1998	Ganderbal (Wandhama)	Young woman, victim of Wandhama massacre .	Lashkar-e-Taiba	Yes
313	Smt. Choti	25-Jan-1998	Ganderbal (Wandhama)	Elderly woman, victim of Wandhama massacre .	Lashkar-e-Taiba	Yes

314	Smt. Dulari	25-Jan-1998	Ganderbal (Wandhama)	Elderly woman, victim of Wandhama massacre.	Lashkar-e-Taiba	Yes
315	Smt. Neeru Ji	25-Jan-1998	Ganderbal (Wandhama)	Woman, victim of Wandhama massacre.	Lashkar-e-Taiba	Yes
316	Sudarshan	25-Jan-1998	Ganderbal (Wandhama)	Man, victim of Wandhama massacre.	Lashkar-e-Taiba	Yes
317	Triloki Nath	25-Jan-1998	Ganderbal (Wandhama)	Elderly man, victim of Wandhama massacre.	Lashkar-e-Taiba	Yes
318	Vijay Kumar	25-Jan-1998	Ganderbal (Wandhama)	Man, victim of Wandhama massacre.	Lashkar-e-Taiba	Yes
319	Vikas Kumar	25-Jan-1998	Ganderbal (Wandhama)	Youth, victim of Wandhama massacre.	Lashkar-e-Taiba	Yes
320	Vinod Kumar	25-Jan-1998	Ganderbal (Wandhama)	Man, victim of Wandhama massacre.	Lashkar-e-Taiba	Yes
321	Ashok Kumar	04-Feb-2000	Anantnag (Telwani)	Massacred by terrorists in Telwani village , Anantnag on 5 Feb 2000. Three Kashmiri Hindus (including Ashok, his teen son and daughter) who had briefly returned to tend their orchards were shot dead by Hizbul Mujahideen gunmen.	Hizbul Mujahideen (Pakistan-backed)	Yes
322	Unshu (Ans hu Koul, teen girl)	04-Feb-2000	Anantnag (Telwani)	Victim of Telwani massacre (shot dead along with her father Ashok and brother).	Hizbul Mujahideen	Yes
323	Veer Ji (Veerji Kumar, boy)	04-Feb-2000	Anantnag (Telwani)	Victim of Telwani massacre (shot dead with family).	Hizbul Mujahideen	Yes
324	Brij Nath Bhat	04-Mar-2000	Anantnag (Brariangan)	Elderly Pandit, shot dead by terrorists in Brariangan, Anantnag on 4 March 2000. (He was one of the few who had stayed behind.)	Hizbul Mujahideen (suspected)	Yes

325	Smt. Lakshmi Devi	21-Dec-2001	Anantnag (Hugam)	Kashmiri Pandit woman. Shot dead at home by unidentified terrorists during a coordinated attack on minority villages in Bijbehara on 21 Dec 2001. (She and one other Pandit lady were killed in Hugam; in nearby Pushkeri, three Sikh girls were also murdered.)	Terrorists (suspected Lashkar-e-Taiba)	Yes
326	Smt. Soni (Sunita)	21-Dec-2001	Anantnag (Hugam)	Kashmiri Pandit woman. Shot dead by the same terrorists in Hugam on 21 Dec 2001 (see entry above).	Terrorists (suspected Lashkar-e-Taiba)	Yes
327	Amit Kher	24-Mar-2003	Pulwama (Nadimarg)	Massacred by terrorists in Nadimarg village on 23-24 March 2003. In that midnight attack, 24 Kashmiri Kashmiri Hindus (11 men, 11 women, 2 children) were rounded up and executed by terrorists dressed in police uniforms. The Pakistan-based Lashkar-e-Taiba claimed responsibility.	Lashkar-e-Taiba (Pakistani terrorist outfit)	Yes
328	Avtar Krishan	24-Mar-2003	Pulwama (Nadimarg)	Victim of Nadimarg massacre (see entry 359).	Lashkar-e-Taiba	Yes
329	Bansi Lal	24-Mar-2003	Pulwama (Nadimarg)	Victim of Nadimarg massacre (see entry 359). (Name appears twice in some lists, but it was one person.)	Lashkar-e-Taiba	Yes
330	“ <i>Jiga</i> ”Kumari (Geeta)	24-Mar-2003	Pulwama (Nadimarg)	Smt. Geeta Devi - victim of Nadimarg massacre (see entry 359).	Lashkar-e-Taiba	Yes

331	Lasa Koul	24-Mar-2003	Pulwama (Nadimarg)	Victim of Nadimarg massacre (see entry 359). (Lassa Koul, not related to the 1990 TV director.)	Lashkar-e-Taiba	Yes
332	Lok Nath	24-Mar-2003	Pulwama (Nadimarg)	Victim of Nadimarg massacre (see entry 359).	Lashkar-e-Taiba	Yes
333	Mohan Lal	24-Mar-2003	Pulwama (Nadimarg)	Victim of Nadimarg massacre (see entry 359).	Lashkar-e-Taiba	Yes
334	“Muna” (Manish)	24-Mar-2003	Pulwama (Nadimarg)	Young boy, victim of Nadimarg massacre (see entry 359).	Lashkar-e-Taiba	Yes
335	Pretam Krishen	24-Mar-2003	Pulwama (Nadimarg)	Praduman Krishen - victim of Nadimarg massacre .	Lashkar-e-Taiba	Yes
336	Pretam Kumari	24-Mar-2003	Pulwama (Nadimarg)	Preetam Kumari - victim of Nadimarg massacre .	Lashkar-e-Taiba	Yes
337	Princy Kumari	24-Mar-2003	Pulwama (Nadimarg)	Young girl, victim of Nadimarg massacre .	Lashkar-e-Taiba	Yes
338	Radha Krishen Bhat	24-Mar-2003	Pulwama (Nadimarg)	Victim of Nadimarg massacre . (Name duplicated in some lists.)	Lashkar-e-Taiba	Yes
339	Rajani	24-Mar-2003	Pulwama (Nadimarg)	Ms. Rajni - victim of Nadimarg massacre . (Name duplicated in lists.)	Lashkar-e-Taiba	Yes
340	Rajini Kumari	24-Mar-2003	Pulwama (Nadimarg)	Young girl, victim of Nadimarg massacre . (Name duplicated in lists.)	Lashkar-e-Taiba	Yes
341	Rakesh Kumar	24-Mar-2003	Pulwama (Nadimarg)	Victim of Nadimarg massacre (see entry 359).	Lashkar-e-Taiba	Yes
342	Smt. Suman Ji	24-Mar-2003	Pulwama (Nadimarg)	Victim of Nadimarg massacre (see entry 359).	Lashkar-e-Taiba	Yes
343	Smt. Soomavati	24-Mar-2003	Pulwama (Nadimarg)	Smt. Soma Wati - victim of Nadimarg massacre (see entry 359).	Lashkar-e-Taiba	Yes
344	Smt. Asha	24-Mar-2003	Pulwama (Nadimarg)	Smt. Asha Jee - victim of Nadimarg massacre (see entry 359).	Lashkar-e-Taiba	Yes

345	Suraj Kumar	24-Mar-2003	Pulwama (Nadimarg)	Young boy, victim of Nadimarg massacre (see entry 359).	Lashkar-e-Taiba	Yes
346	Triloki Nath	24-Mar-2003	Pulwama (Nadimarg)	Elderly man, victim of Nadimarg massacre (see entry 359).	Lashkar-e-Taiba	Yes
347	Tej Krishan (unknown surname)	03-Dec-2004	Srinagar (city)	Shot dead by terrorists in Srinagar. (One of the last targeted killings of a Pandit in the Valley; marked the continuing threat post-exodus.)	Terrorists	Yes
348	Omkar Nath "Motta"	29-Jul-1990	Srinagar	<i>Scarce Records</i>	-	-
349	Ratinder Koul	14-Oct-1990	Srinagar	(<i>Likely part of the 14-Oct-1990 Srinagar massacre - possibly "Nancy Koul" as in entry 281; duplicate.</i>)	-	-
350	Radha Krishen Koul	24-Aug-1990	Anantnag	(<i>Entry out of chronological order; presumably a Pandit killed in Aug 1990 - already covered in entries above.</i>)	-	-

Sources: This table is compiled from documented reports including community records (Panun Kashmir's *List of Martyrs*), contemporary news articles, and scholarly archives. Key incidents like the murders of BJP leader Tika Lal Taploo, Justice Neelkanth Ganjoo, and others that precipitated the 1990 exodus are well recorded. Massacre events such as **Sangrampora 1997** (7 Kashmiri Hindus killed), **Wandhama 1998** (23 killed), and **Nadimarg 2003** (24 killed) have been acknowledged in media and security reports. Terrorist groups like JKLF (Kashmiri separatists supported by Pakistan's ISI) were responsible for many early targeted killings, while Pakistan-based jihadist outfits - **Hizbul Mujahideen**, **Lashkar-e-Taiba**, **Jaish-e-Mohammad**, etc. - carried out the later massacres. Unfortunately, for a large number of individual cases, official files have **sparse details**, as indicated by the many entries marked "scarce record." The world largely remained silent as these atrocities unfolded, and to this day, very few perpetrators have been prosecuted, underscoring the Kashmiri Hindus' ongoing struggle for justice.

Legal Parameters: Overlapping Crimes & Applicable Law

The brutal campaign against Kashmiri Hindus, while commonly described as “*ethnic cleansing*,” implicates multiple **international crimes** under law. Ethnic cleansing per se is *not a formally defined crime* in international law, but the underlying acts; murder, rape, forcible expulsion, persecution, are squarely prohibited as *Crimes Against Humanity*, *War Crimes*, and potentially *Genocide*. In parallel, India's domestic law and constitution were profoundly violated by this campaign. Below is an analysis of the legal characterisations:

Crimes Against Humanity (CAH): The systematic nature of the violence and its targeting of a civilian population (the Kashmiri Hindus) for their identity fits the definition of crimes against humanity. Under customary international law and instruments like the Rome Statute of the International Criminal Court (which, though India is not party to, reflects international standards), CAH include acts such as *murder, extermination, deportation or forcible transfer of population, rape, and persecution* committed as part of a widespread or systematic attack against a civilian population. The ethnic cleansing of Kashmiri Hindus meets this threshold:

1. **Widespread/Systematic Attack:** The violence spanned multiple years and districts, following a discernible policy (e.g., targeted killings followed by mass exodus and further massacres), clearly *systematic*. Thousands of families were affected, which is *widespread*.
2. **Protected Civilian Population:** The victims were civilians (non-combatants), attacked because of their religious/ethnic group. This qualifies as *persecution on religious grounds*, a well-established crime against humanity (persecution can entail acts like killings and serious harm inflicted on an identifiable group).
3. **Deportation/Forcible Transfer:** Forcing a population to flee through violence and fear is itself a crime against humanity. The Kashmiri Hindus' flight was involuntary; as discussed, a *lack of genuine choice* due to threats and violence means it was a forcible transfer. People were effectively deported from their homeland within their own country.
4. **Other Inhumane Acts:** The brutality (torture, rape) and the intentional infliction of severe suffering also count as “other inhumane acts” under CAH.

In short, the *campaign qualifies as a crime against humanity*. Indeed, many of the specific deeds (rape, murder, forced displacement) are enumerated CAH acts when done as part of a systematic attack. India's own National Human Rights Commission (NHRC), investigating the Kashmiri Hindus' case, in 1999 held that the community had been subjected to “*acts akin to genocide*,” and explicitly acknowledged that what occurred were *crimes against humanity*. This official finding underscores that the atrocities crossed the legal threshold of offenses that shock the conscience of humanity.

Genocide: Genocide is the *intentional destruction, in whole or in substantial part, of a national, ethnic, racial, or religious group as such*. Were the crimes against Kashmiri Hindus *genocidal*? The answer is debated, but many elements point that direction. The Kashmiri Hindus were targeted as a *religious group (Hindus)* and significant portions of that community were killed or expelled with the clear goal of eliminating their presence in Kashmir. The terrorists own statements and ideology (e.g., establishing *Nizam-e-Mustafa* and labeling Kashmiri Hindus as *infidels to be purged*) reveal an intent to *destroy the group's viability in the region*. Over 95% of Kashmiri Hindus were removed; those

who stayed were murdered over time. These outcomes align with an intent to destroy the group “at least in part.” However, legally proving *genocidal intent* (as opposed to the intent to “ethnically cleanse” by expulsion) can be challenging. The genocide convention focuses on physical or biological destruction of a group. In Kashmir, while the primary method was expulsion, it was effectuated via murders and terror that could qualify as “*deliberately inflicting conditions of life calculated to bring about the group's destruction in part.*” The NHRC stopped short of labeling it genocide, but noted that “*a genocide-type design may exist*” in the minds and utterances of the terrorists. In any event, many acts committed (killing members of the group, causing serious bodily or mental harm) are listed as genocidal acts in Article II of the Genocide Convention. The key missing piece for a full legal genocide determination is definitive evidence of specific intent to *physically annihilate* the group rather than “just” drive it out. If such intent were demonstrated (for example, through captured terrorist documents or declarations of wanting to *exterminate* all Hindus in Kashmir), the label of genocide could be legally sustained. Regardless, as the NHRC phrased, this was “*near-genocide*”, it meets many substantive criteria without an authoritative international tribunal having adjudicated it as such.

War Crimes: At the time of these events (late 1980s through 1990s), an armed conflict was underway in Jammu & Kashmir - an insurgency involving non-state armed groups against the Indian state. This conflict (even if characterised as internal) triggers international humanitarian law (IHL), notably Common Article 3 of the Geneva Conventions and Additional Protocol II (to which India is not formally party, but much of which reflects customary law). Under IHL, *deliberate attacks on civilians, murder, torture, outrages upon personal dignity (like rape), and the taking of hostages or unlawful coercion of civilians* are all **war crimes** in both international and non-international conflicts. The ethnic cleansing campaign squarely violated these norms:

1. Civilians were *intentionally attacked and killed* (a war crime under any regime of IHL).
2. Rape and sexual violence were used as tools of war, these are explicitly war crimes under modern IHL jurisprudence, and certainly violate Common Article 3's ban on “violence to life and person” (which includes cruel treatment and outrages).
3. Forcible displacement of civilians is addressed in Protocol II (Article 17 prohibits ordering the displacement of civilian populations for reasons related to the conflict, unless for their security or imperative military reasons). The forced exodus of Kashmiri Hindus had no legitimate justification, it was purely to terrorise, thus violating this rule. As the UN-backed Commission of Experts noted in other contexts, such “*unlawful deportation or transfer*” is both a grave breach and war crime.
4. Ruses such as terrorists dressing as policemen or soldiers (as in Nadimarg 2003 and Wandhama 1998) to perpetrate killings are perfidious acts contributing to war crimes of killing civilians.
5. The organized nature of these crimes (with groups like Lashkar-e-Taiba and Hizbul Mujahideen participating) further indicates that these were not random excesses but part of the conduct of hostilities, albeit illegal conduct.

In sum, the violence against Kashmiri Hindus violated the fundamental IHL principle of distinction and humanity. Any prosecution could charge many of these acts as war crimes (e.g., murder of

protected persons, pillage, etc.), assuming the nexus to the armed conflict is established (which it is, given the terrorists' insurgency).

Indian Domestic Law and Constitutional Protections: The ethnic cleansing also grievously violated the Constitution of India and Indian criminal law:

1. **Right to Life (Article 21):** The most obvious breach, the terror campaign involved outright murder and endangerment of life, violating Article 21's guarantee that "*no person shall be deprived of his life or personal liberty except according to procedure established by law.*" Thousands of Kashmiri Hindus were deprived of life with no due process, indeed, murdered in cold blood.
2. **Right to Equality and Non-Discrimination (Article 14):** The Kashmiri Hindus were targeted and driven out solely due to their religious identity, amounting to discrimination of the worst kind. Article 14 assures equality before the law and equal protection of the laws; the failure of the state at the time to protect this minority from targeted violence also raises issues under this provision (the state's inability to safeguard one group equally).
3. **Freedom of Movement and Residence (Article 19(1)(d) & (e)):** Indian citizens have the right to move freely throughout the territory of India and reside in any state. For Kashmiri Hindus, these rights were nullified in practice - they were *forced to abandon* their place of residence and could not return for decades due to threat of violence. Being made refugees in their own country runs counter to the spirit of Article 19.
4. **Freedom of Religion (Article 25):** Kashmiri Hindus, as Hindus, have the right to freely profess and practice their faith. By terrorising them into exile, destroying temples, and creating an environment where being a Hindu in Kashmir was life-threatening, the perpetrators effectively extinguished this freedom in the Valley. The cleansing was an extreme form of religious persecution - anathema to Article 25's protections.

Additionally, the acts committed; murder, rape, criminal intimidation, arson, etc. violate various provisions of the Indian Penal Code. In theory, those responsible could be charged with offenses ranging from homicide to rioting and unlawful assembly, to various specific crimes like rape and desecration of places of worship. It is worth noting that in 1997, in response to the plight of the Kashmiri Hindus, the state of J&K did enact a law (J&K Migrant Immovable Property Act, 1997) to prevent distress sales and protect properties left behind. However, implementation was weak, and large-scale justice (criminal prosecution of terrorists or restoration of homes) remained elusive. The Indian National Human Rights Commission's 1999 proceedings acknowledged state obligations to rehabilitate the community and punish perpetrators, even as it lamented the lack of effective action.

Forced Migration as a Human Rights Violation: International law is clear that even if people *appear* to "migrate," if their movement is compelled by persecution or violence, it is a violation of their rights. The absence of genuine choice defines such forced migration. In the case of Kashmiri Hindus, the coercion was overt, leave or be killed, so there is no doubt their displacement was forced. This triggers multiple international protective regimes: for instance, as *internally displaced persons (IDPs)* within India, the Kashmiri Hindus should benefit from the UN Guiding Principles on Internal Displacement which affirm that displacement due to persecution or conflict violates fundamental rights and that the displaced have rights to protection and return in safety and dignity. Moreover,

India's obligation to protect its citizen rights was tested, arguably, the J&K state governments at that time failed to prevent these abuses by Pakistan backed terrorist actors, raising questions under its duty to secure fundamental rights under the larger Republic of India guarantees.

In summary, **the ethnic cleansing of Kashmiri Hindus was not only a human tragedy but a cluster of serious international crimes**. The acts committed fall under multiple legal categories; each sufficient in itself for international accountability:

- As a *crime against humanity*, it was a widespread, systematic attack on a civilian population (the Hindu minority) involving murder, rape, persecution and forcible transfer.
- As acts potentially *genocidal* in nature, it aimed to destroy a religious group's existence in a region, with many qualifying genocidal acts committed (killing, causing grievous harm).
- As part of an armed conflict, it breached the laws of war (war crimes) by intentionally targeting civilians and using terror.
- It also starkly violated basic human rights enshrined in both Indian law and international human rights law (right to life, security, home, religion, etc.).

Notably, international tribunals (ICTY, ICTR) and the ICC have prosecuted similar conduct under charges of *persecution, extermination, deportation*, and even *genocide*. Although there has been no such tribunal for Jammu and Kashmir as Indian Judiciary is competent and robust evidenced from the ongoing trial of JKFL chief Yasin Malik, the legal characterisation is evident from the facts. As the UN Commission of Experts on Yugoslavia noted, practices of ethnic cleansing "could constitute crimes against humanity [and] well-defined war crimes" and may fall within the Genocide Convention's ambit. The Kashmiri Hindu (Pandit) case checks those boxes. It is therefore subject to the full array of international criminal prohibitions, and those responsible (individuals and aiding states like Pakistan) should, in principle, face accountability under these legal frameworks.

Perpetrators: Terrorist Groups and Pakistan's Role

The execution of the ethnic cleansing in Kashmir was primarily carried out by **Pakistan-backed jihadi terrorist organizations and local Islamist terrorists**. These groups, though varied in their stated aims (from Kashmiri “independence” to merging with Pakistan to establishing Islamic rule), converged in their hostility toward Kashmiri Hindus and their involvement in driving them out.

Below is an overview of the key actors and their roles:

- **Jammu Kashmir Liberation Front (JKLF):** The JKLF is a terrorist separatist organization that initially led the insurgency around 1989-90. It officially advocated Kashmiri independence (a Islamist line to create a Islamic state), but in practice JKLF cadres were deeply complicit in the early anti-Hindu violence. JKLF terrorists carried out many of the first targeted killings of Kashmiri Hindus. As noted above, JKLF assassins killed leaders like Tika Lal Taploo and Justice Ganjoo in 1989. One JKLF terrorist, Farooq “Bitta” Karate, infamously admitted to murdering numerous Kashmiri Hindus in 1990 (by his own boasts, at least 20). The JKLF's campaign of terror had the effect of sparking the exodus. Importantly, although JKLF presented itself as an local rebel group, it had substantial backing from Pakistan and is evidently a terror proxy. *Pakistan's ISI provided arms, training, and safe haven* to JKLF fighters across the border. In one illustrative case, a JKLF gunman confessed that the assassination of a Hindu broadcasting official (Lassa Koul of Doordarshan) was done on *orders from Amanullah Khan, JKLF's Pakistan-based chief*. This demonstrates Pakistan's direct hand in guiding JKLF operations. Over time, the JKLF's prominence waned (and it declared a ceasefire in 1994), but by then the Kashmiri Hindu (Pandit) exodus had already occurred and JKLF continued its proxy terroist agendas through other such organisations throughout. JKLF's early actions essentially *lit the fuse* of ethnic cleansing.
- **Hizbul Mujahideen (HM):** Hizbul Mujahideen emerged around 1989 as the armed wing of **Jamaat-e-Islami Kashmir**, with an explicitly Islamist and pro-Pakistan agenda. It soon became one of the largest terrorist outfits in the valley. *Pakistan's support for Hizbul was significant*, it was (and is) often described as *Pakistan's “proxy” or favoured terrorist entity* in Kashmir. Hizbul Mujahideen terrorists remain responsible for countless killings of Kashmiri Hindus throughout the 1990s. Notably, *Hizbul was implicated in the March 1997 Sangrampora massacre* (seven Kashmiri Hindus killed) and is believed to have executed other attacks on remaining Kashmiri Hindu (Pandit) families (e.g., Nadimarg 2003 was initially blamed on LeT, but some also suspect local Hizb cadres' involvement). The ideological bent of Hizbul, guided by Jamaat-e-Islami, was to establish an Islamic state under Sharia (*Nizam-e-Mustafa*). To this end, cleansing the valley of non-Muslims was seen as a necessary step. Jamaat-e-Islami activists in the late '80s had already been spreading communal rhetoric; when the insurgency began, they and Hizbul targeted Kashmiri Hindus as *agents of Indian rule* and as unbelievers. The organization's role in the ethnic cleansing is thus central - it combined *religious zealotry with military training provided by ISI*. Many Kashmiri Hindus who were killed in outlying villages in the early 1990s fell victim to Hizbul hit squads. The group's actions were so systematic that even the local press and human rights groups recognised it as a key perpetrator of minority killings.
- **Lashkar-e-Taiba (LeT):** LeT is a Pakistan-based Islamist terror organization (technically based in Punjab province of Pakistan, under the aegis of the Markaz Dawa-Wal-Irshad, later

Jamaat-ud-Dawa). While LeT's primary theatre became Indian cities (with attacks like the 2008 Mumbai terrorist attacks), it was *very active in Kashmir from the mid-1990s onward*. Being an outsider-led outfit, LeT cadres infiltrated from Pakistan to supplement the insurgency. LeT espoused a rigid Salafist ideology and had no local social base among Kashmiri Muslims (who mostly follow Sufi traditions), but it had Pakistani encouragement to "Islamize" and escalate the conflict. **LeT played a major role in some of the worst massacres of Hindus in J&K.** For instance, intelligence and later investigations blamed LeT for the *January 1998 Wandhama massacre* (23 Kashmiri Hindus murdered). LeT was also linked to the *2003 Nadimarg massacre* - in fact, LeT *claimed responsibility* for Nadimarg in a chilling admission of its hand in slaughtering 24 Hindu villagers. LeT's involvement underscores the cross-border nature of the cleansing: these fighters were Pakistan nationals (or at least led from Pakistan) coming explicitly to target non-Muslim minorities. Their actions were coordinated with local terrorists at times. LeT essentially served as an instrument of Pakistan's policy, with the ISI using it to internationalise jihad in Jammu and Kashmir. The presence of LeT and similar groups gave the campaign an even more terrorist Islamist character (with slogans of global jihad against Hindus and India).

- **Jaish-e-Mohammed (JeM) and Others:** Jaish-e-Mohammed, another Pakistan-based jihadist outfit formed in 2000 by Masood Azhar, also targeted Kashmiri minorities, though it is more infamous for attacks on Indian security forces (like the Parliament attack in 2001). Still, any Pakistani jihadist groups operating in Kashmir shared the ideological goal of an Islamic emirate and thus saw Hindus as legitimate targets. **Jamaat-ul-Mujahideen (JuM)** was yet another jihadist group; significantly, the financial chief of JuM was married to Dukhtaran's leader Asiya Andrabi, forming a web of connections through which Pakistani funds flowed to disparate terrorist actors. Also, in the early 1990s, groups like *Allah Tigers* briefly surfaced, calling for strict Islamic codes (banning alcohol, cinemas) and threatening minorities, though these were short-lived, they contributed to the intimidation climate. Overall, the *later 1990s phase* of violence (post-exodus) saw **Pakistan-based outfits (Hizbul, LeT, JeM, etc.) carrying out high-profile massacres of Kashmiri Hindus**, indicating that Pakistan's proxy strategy deliberately included terrorising any Kashmiri Hindus who hadn't fled or who might return.
- **Jamaat-e-Islami Kashmir:** While not an "armed group" itself during that period, Jamaat-e-Islami (JeI) was the ideological driver behind much of the Islamist terrorism. Many Hizbul Mujahideen terrorists were JeI members or recruits. JeI's discourse in the late 1980s demonised India and by extension the Kashmiri Hindus (seen as symbols or collaborators of Indian rule). Disguised as a socio-political organization, Jamaat did provide a *quasi-state structure* in some rural areas, influencing local attitudes and sometimes *turning a blind eye* or even encouraging the harassment of Kashmiri Hindus. In 1990, reports indicated that areas under Jamaat influence saw fewer Kashmiri Hindus, as they had been pressurised to leave early. Thus, Jamaat acted as an **ideological incubator** for ethnic cleansing, propagating the vision of an Islamic Kashmir that left little room for Hindu coexistence. The fact that Hizbul Mujahideen is often described as Jamaat's terrorist wing is telling; Jamaat leaders later claimed they didn't favour violence against Kashmiri Hindus, but evidence suggests at least passive complicity. Jamaat was eventually banned for some years due to its terrorist links and continues to be banned following the amendment of Article 370 of the Indian constitution.

- **Dukhtaran-e-Millat (DeM):** *Dukhtaran-e-Millat* (translated “Daughters of the Nation”) is an all-women Islamist organization in Kashmir, led by **Asiya Andrabi**. Formed in 1987, Dukhtaran did not carry out armed attacks itself but can be categorised as a “soft terror” outfit - using threats, propaganda, and moral policing in support of the terrorist movement. Dukhtaran advocated *jihad to establish Islamic law in Kashmir* and ardently supported Kashmir's accession to Pakistan. During the 1990s, the group was active in intimidating Kashmiri women to adhere to strict Islamic dress codes and values (e.g., forcing the veil). It also staunchly opposed any concessions or peace talks. While Dukhtaran's primary activities were social enforcement of fundamentalism, it provided **logistical and ideological support** to violent jihadi groups. Security agencies suspect Dukhtaran members acted as *couriers for arms and funds* for outfits like Hizbul and Jaish. Notably, *the group received funding from Pakistan's ISI* via hawala channels - one case revealed ISI funds being routed from London to Dukhtaran's leader. This indicates that even ostensibly unarmed separatist fronts were on Pakistan's payroll and part of the broader machinery of terror. Dukhtaran's rhetoric certainly contributed to the climate of hostility against non-Muslims; Andrabi once famously declared that Kashmir's freedom struggle was a religious war and that Kashmir should be exclusively Muslim, openly *endorsing the expulsion of Hindus*. She celebrated the Taliban's rise and called for similar rule in Kashmir. Such messaging bolstered the resolve of terrorists and perpetuated a hardline stance against rehabilitating Kashmiri Hindus. Furthermore, Dukhtaran frequently coordinated with the **All Parties Hurriyat Conference** in protests and campaigns, which brings us to the next actor.
- **Hurriyat Conference:** The **Hurriyat** is not a single group but an umbrella alliance of separatist organisations formed in 1993. It included Islamists like Jamaat-e-Islami, as well as some pro-separatism figures. While the Hurriyat did not carry out violence directly, it **provided an ideological and political cover** for the terrorist campaign. Hurriyat leaders consistently downplayed or justified the exodus of Kashmiri Hindus. Rather than condemn the killings, they often deflected blame onto the Indian government (pushing conspiracy theories that the exodus was engineered by the Indian state to malign the separatists). The hardline faction of Hurriyat led by Syed Ali Shah Geelani (formerly of Jamaat-e-Islami) was especially averse to acknowledging the community's suffering. In fact, Geelani and others would insist that Kashmiri Hindus were welcome to return (for optics) but simultaneously assert that “*their migration was voluntary and Islamic values will prevail and that Kashmir is of Pakistan*” This revisionism amounted to denial and thus shielded the perpetrators from scrutiny. Meanwhile, Hurriyat cadres on the ground enforced shutdowns and protests in tandem with terrorist agendas, effectively acting as the civil face of the insurgency. The Hurriyat's soft rhetoric internationally (speaking of human rights) masked its tacit support for the Islamisation of the movement. On some occasions, when moderate Hurriyat voices hinted at accommodating Kashmiri Hindus, they faced threats; for example, Abdul Gani Lone (a Hurriyat leader) was assassinated in 2002 by terrorists, allegedly because he advocated dialogue, an act even Asiya Andrabi of Dukhtaran had incited Lashkar-e-Taiba to carry out. This illustrates how extremist and “moderate” separatists often worked in tandem to maintain a hard line. Overall, Hurriyat was crucial in **legitimising the terrorism** as an expression of popular will, thus indirectly legitimising the ethnic cleansing in the eyes of many Kashmiri Muslims and external observers. By not unequivocally condemning the terror against Kashmiri Hindus (and in some cases overtly encouraging Islamist policies), Hurriyat became an accessory after the fact, if not before it.

- **Pakistan's Direct Involvement:** While discussing perpetrators, it is impossible not to highlight the role of the Pakistani state (through its military and intelligence apparatus) as *the prime mover behind many of these groups*. Pakistan's **Inter-Services Intelligence (ISI)** essentially *curated, trained, and funded* the militias listed above. JKLF's early campaign had ISI blessings until JKLF fell out of favour (for being pro-independence rather than pro-Pakistan). From then on, Pakistan heavily backed **Hizbul Mujahideen** (Jamaat's terrorist arm) to supplant JKLF, providing weapons and training camps in Pakistani territory. Throughout the 1990s and 2000s, ISI continues to sponsor groups like Lashkar-e-Taiba and Jaish-e-Mohammed to keep up the insurgency. Investigations and arrests over the years have revealed money trails: e.g., hawala operators funnelling ISI funds to Hurriyat leaders, who then distribute to terrorist commanders. One Hurriyat figure, Syed Ali Shah Geelani, was caught in such a terror-funding case (2011) where it was shown that he received money from ISI to pay operatives of Hizbul Mujahideen. Likewise, Asiya Andrabi of Dukhtaran-e-Millat received ISI-sourced funds to sustain her activities. In essence, *Pakistan acted as the lynchpin uniting these varied actors*, a provider of resources, strategic direction, and safe haven. Pakistani regular forces also at times engaged directly: e.g., during the 1999 Kargil War, which Pakistan initiated, local Hindu villagers in areas of intrusion were targeted by Pakistan-backed terrorists, adding another layer to the threat against minorities. While individual terrorists pulled triggers, Pakistan's involvement was so entrenched that one can fairly say **the ethnic cleansing was orchestrated as a matter of state policy by Pakistan, executed through its non-state proxies**. This has significant legal implications, discussed in the next section.

To summarise, the perpetrators of the Kashmiri Hindu ethnic cleansing included a range of Islamist terrorist organizations, all interconnected and largely sponsored from across the border:

- The JKLF spearheaded the initial terror wave, with Pakistan's patronage.
- Hizbul Mujahideen, backed by Pakistan and inspired by Jamaat-e-Islami, took over as a leading perpetrator, embedding a religious extremist motive.
- Pakistan-based jihadist groups like Lashkar-e-Taiba and Jaish-e-Mohammed joined in, committing some of the worst atrocities against the remaining Kashmiri Hindus.
- “Social” outfits like Dukhtaran-e-Millat and the separatist Hurriyat Conference provided ideological justification, propaganda, and even logistical aid, reinforcing the terrorists' goals.
- Overarching all was Pakistan's ISI, coordinating and funding this constellation of actors.

This multi-tiered perpetrator structure; *terror cells on the ground, ideological fronts in the society, and a state apparatus in the shadows*, is a classic model of how ethnic cleansing can be carried out under the guise of an insurgency. It blurs the line between state and non-state action, which is crucial when assigning legal responsibility for these crimes.

Pakistani State Responsibility

A critical question in the aftermath of the Kashmiri Pandit ethnic cleansing is the accountability of the State of Pakistan for its role in supporting and exporting the terror. International law provides doctrines to attach responsibility to states for atrocities committed by non-state actors when certain conditions are met. In this case, Pakistan's deep involvement in arming, training, and directing the terrorist groups implicates it in the commission of crimes against humanity and other violations.

Pakistan's legal culpability can be analysed by the below legal parameters:

1. Aiding and Abetting International Crimes: Under general international law (including the International Law Commission's Articles on State Responsibility), if a state *knowingly aids or assists* another state or a non-state actor in the commission of an internationally wrongful act, that state can be held responsible for aiding and abetting. The acts against Kashmiri Hindus, being crimes against humanity and possibly acts of genocide, are certainly internationally wrongful acts *erga omnes* (owed to the international community). Pakistan provided extensive aid (weapons, training, logistical support, finances, safe havens) to terrorists while knowing full well these terrorists were committing atrocities. For example, Pakistan's agents funneled money to terrorists: as one case showed, an **ISI-linked hawala network sent funds to Dukhtaran-e-Millat and Hurriyat leaders, which were then used to finance Hizbul Mujahideen's activities**. Another instance: a captured JKLF terrorist disclosed he acted on instructions from a Pakistan-based leader in targeting a Hindu official. These indicate intentional facilitation. In international criminal law, aiding and abetting liability requires practical assistance with awareness of the underlying crime - a standard clearly met here given Pakistan's sustained campaign to sponsor the insurgency and its awareness (if not encouragement) of the anti-Kashmiri Hindu (Pandit) violence. Indeed, Pakistan's support was integral to the crimes' commission; without it, the scale of ethnic cleansing would likely not have been possible. Therefore, Pakistan's conduct qualifies as *aiding and abetting crimes against humanity* (and potentially genocide, if that threshold is legally applied). Historically, precedents like the conviction of Charles Taylor (former Liberian president) for aiding and abetting war crimes in Sierra Leone, or the findings of the ICTY about Serbia's support to Bosnian Serb forces, illustrate that high-level supporters can be held accountable. By analogy, Pakistani officials who orchestrated the support to terrorists could, in theory, be liable for aiding/abetting these international crimes.

2. State Responsibility under ICJ Jurisprudence: The International Court of Justice (ICJ) in the Bosnian Genocide Case (Bosnia v. Serbia, 2007) dealt squarely with a state's responsibility for genocide committed by non-state proxies. The ICJ held Serbia responsible for failing to prevent genocide at Srebrenica and for not punishing it, though it did not attribute the Srebrenica massacre to Serbia's organs because Serbia did not have "effective control" over the Bosnian Serb forces in that operation. The ICJ reaffirmed the stringent "effective control" test (drawn from the Nicaragua case (ICJ, 1986)) for attributing non-state actors' acts to a state. What does this mean for Pakistan? If one were to argue that groups like Hizbul or Lashkar acted as de facto agents of Pakistan, one would need to show Pakistani authorities had effective control over their specific operations targeting Kashmiri Hindus. While Pakistan's general control and sponsorship are evident, proving operational control in particular massacres would be evidentiary heavy-lifting. However, even if Pakistan's control wasn't so direct as to make the terrorists its de facto organs (which would allow directly attributing the ethnic cleansing acts to Pakistan), Pakistan can *still be internationally responsible for its own conduct*: i.e., for actively supporting and failing to prevent the crimes. In Bosnia v. Serbia, Serbia was censured for

not using its influence to prevent genocide. In our case, Pakistan enabled ethnic cleansing and encouraged it. If a similar case were brought to the ICJ (hypothetically, India v. Pakistan for genocide/CAH of Kashmiri Hindus), India could argue Pakistan breached its obligations under the Genocide Convention (to prevent and punish genocide) and general international law by providing sanctuary and support to genocidal actors. The *effective control* test might or might not be met (one could argue that Pakistan's control over groups like Lashkar was indeed very high - LeT chiefs like Hafiz Saeed operated under ISI's wing, and Pakistan is often said to use LeT as an unofficial arm). But even absent formal attribution of every act, Pakistan's role is one of a State collaborating in wrongful acts.

3. State Responsibility for Non-State Actors Doctrines: The Nicaragua case (ICJ, 1986) established that a state (the U.S. in that case) that trains, arms, and finances rebels (the Contras) is responsible for unlawful use of force and perhaps for aiding in violations, but their acts weren't fully attributed to the U.S. without evidence of direct command. Similarly, Pakistan's assistance to terrorists can be viewed as a breach of the principle of non-intervention (using indirect force). Moreover, Article 16 of the ILC Articles on State Responsibility states that a state aiding another state in committing an internationally wrongful act is responsible if it knew of the circumstances of the act. By extension, aiding non-state actors in committing atrocities should engage responsibility if done knowingly. Pakistan knew the very purpose of these terrorist groups was to commit violent acts in Jammu and Kashmir; indeed that was the strategy. Thus Pakistan breached international obligations to respect another state's sovereignty and to refrain from support of terrorism (as elaborated next). It's also pertinent that UN Security Council resolutions have repeatedly mandated that states must not support terrorists:

- **UNSCR 1373 (2001)**, passed after 9/11, under Chapter VII requires all states to “*refrain from providing any form of support, active or passive, to entities or persons involved in terrorist acts,*” and to “*deny safe haven*” to those who finance, plan or execute terrorist acts. While 1373 came in 2001 (after much of the Kashmiri Hindu (Pandit) exodus), it reaffirmed an existing principle that **cross-border terrorism is an international peace and security threat**. Pakistan's harbouring and sponsoring of Jammu Kashmir-focused terror outfits runs afoul of this obligation. Earlier resolutions, such as UNSCR 1269 (1999), also unequivocally condemn aiding or acquiescing in terrorism.
- The Security Council specifically addressed cross-border terrorism in Kashmir in the 1990s indirectly through statements urging respect for the Line of Control and non-interference. While it did not name Pakistan in resolutions, the international norm was clear: supporting insurgents in another country violates international law (both *jus ad bellum* and counter-terrorism norms).
- Additionally, customary international law as reflected in global counter-terrorism treaties (e.g., financing of terrorism convention) obliges states to prevent their territory from being used to foment terror elsewhere. Pakistan's failure on this count could be seen as *state negligence or connivance in terrorist acts*, which killed and maimed civilians.

4. Genocide Convention Obligations: If we consider the ethnic cleansing as genocide (or an attempt at it), Pakistan as a contracting party to the Genocide Convention (Pakistan has ratified it) is obligated “*to prevent and to punish*” genocide. The ICJ in the Bosnia case clarified this means a state must use all means available to prevent genocide if it knows of a serious risk. Pakistan arguably had a hand in

genocide-like targeting of Kashmiri Hindus and enabled it. That would constitute a breach of the Genocide Convention. Even if one doesn't label it genocide legally, if Pakistan's support continued knowing the campaign of persecution, it breached basic humanitarian obligations.

5. Direct Aggression: Scholars and Indian officials have often argued that Pakistan's conduct amounted to a form of **aggression** under international law, using irregular forces to wage war against India's civilian population. The UN General Assembly's Definition of Aggression (1974) includes "*sending by or on behalf of a State armed bands... which carry out acts of armed force against another State of such gravity as to amount to*" an armed attack (Article 3(g)). While Pakistan's sponsorship of the terror through Islamist jihad in Jammu and Kashmir (including the cleansing of Kashmiri Hindus) meets this definition. Aggression is a state crime; while individuals can't yet be tried for it except at the ICC (where conditions aren't met here), the classification highlights the severity of Pakistan's wrongdoing at a state level.

In conclusion, **Pakistan can be held legally accountable on several grounds:**

- *State responsibility for internationally wrongful acts:* by orchestrating and supporting the ethnic cleansing of Kashmiri Hindus, Pakistan violated international obligations (non-interference, human rights protections, counter-terrorism duties, and the Genocide Convention). It aided and abetted crimes against humanity and breached its duty to prevent genocide.
- *State responsibility for the conduct of its proxies:* if evidence were marshalled that terrorist groups like Hizbul or Lashkar were effectively under Pakistan's control (which evidence is available; especially in JKLF, Hurriyat and Lashkar's case, often described as an arms of the Pakistani establishment, then their acts (the killings, crimes and massacres, etc.) could be legally imputed to Pakistan. That would make Pakistan directly responsible for those internationally wrongful acts, not just an accomplice.
- *United Nations framework:* Pakistan's actions stand in stark contravention to U.N. Security Council resolutions that call on states to refrain from sponsoring terrorism. This gives the Security Council the theoretical authority to hold Pakistan accountable (Chapter VII measures, sanctions, etc.), though in practice geopolitics have prevented any punitive resolution naming Pakistan.
- *Accountability mechanisms:* Short of an ICJ case or a UN tribunal (neither of which have occurred for Kashmiri Hindus), the record of Pakistan's involvement is documented in various reports and is implicitly recognised by bodies like the U.S. State Department and others. For example, the U.S. has listed groups like LeT and HM as Foreign Terrorist Organizations, noting their Pakistani backing. While those are political designations, they highlight international awareness of Pakistan's role.

Importantly, attributing legal blame to Pakistan does not diminish the individual liability of the terrorist perpetrators, both could concurrently be liable. The doctrines from the ICJ's Nicaragua and Bosnia judgments illustrate that a state can be complicit even if the non-state actors are the immediate perpetrators. In the case of Kashmiri Hindus, Pakistan's "*direct or indirect involvement*" was so extensive that one can rightly argue the ethnic cleansing was *state-enabled*. To draw an analogy: similar to how Serbia was held to have "known and failed to prevent" the genocide in Bosnia, Pakistan

knew and facilitated the terrorist campaign against Kashmiri Hindus. Thus, from an international law perspective, Pakistan bears significant responsibility and could be held accountable under doctrines of State responsibility for aiding and abetting crimes against humanity and for sponsoring terrorism across borders.

Concluding Observations and the Quest for Justice

The ethnic cleansing of Kashmiri Hindus meets the **highest thresholds of international atrocity crimes**. The evidence demonstrates that what this minority endured was not random communal strife but a deliberate, systematic campaign of persecution, *a crime against humanity in both legal and moral terms*. Many aspects arguably satisfy the definition of genocide, and at the very least, the pattern of “*murderous ethnic cleansing*” in Kashmir aligns with conduct that international law seeks to prevent and punish. Over 95% of an indigenous community was uprooted from their homeland; hundreds were killed in the process. This stark outcome, the near-total depopulation of Kashmiri Hindus from the Valley - is the tragic *proof of the effectiveness of the cleansing policy*. It underscores why the world has recognised ethnic cleansing as an abhorrent crime that threatens human diversity and peace.

For too long, the plight of the Kashmiri Hindus did not receive adequate international attention. While genocides and ethnic cleansings in other parts of the world (the Balkans, Rwanda, etc.) prompted global outcry and tribunals, the Kashmiri Hindus case remained largely marginalised. This has begun to change as more voices call it out for what it is, a grievous human rights tragedy. Acknowledgment is a crucial first step: terming it correctly (as ethnic cleansing, as crimes against humanity, even as genocide) matters to the victims and to history. It validates the suffering and counters revisionist narratives that seek to minimize or justify the atrocities. Recently, scholars, activists, and diaspora groups have worked to document the full scale of what happened (as evidenced by detailed lists of killings and testimonies of the displaced). Such documentation is essential for truth-telling. The international community, including the UN and human rights organizations, should formally acknowledge that the Kashmiri Hindus were targets of *a systematic campaign of religious cleansing*. Only with truth acknowledged can reconciliation and prevention occur.

Justice for the victims has been painfully elusive. Very few of the individual perpetrators have been prosecuted or punished, whether in India or elsewhere. Many terrorists from that era either died in battle, received safe haven in Pakistan, or in some cases, were released under amnesties or swaps for victims of terror. This culture of impunity not only denies closure to survivors but also undermines deterrence. As discussed, Pakistan's role is central. Any pursuit of accountability must grapple with how to hold a state responsible. While political realities make an ICJ case or sanctions difficult, raising the issue in international forums increases pressure. At the very least, Pakistan should be pressed to acknowledge its role and cease any remaining support to extremist elements. Without that, the risk of recurrence remains - indeed, targeted killings of minorities in Kashmir have seen upticks even in recent years, showing that the hateful ideology persists. Counter-terrorism cooperation and sanctions on the groups involved (many already banned internationally) should continue to be enforced rigorously.

Justice is not only punitive but also restorative. For the Kashmiri Hindus, justice includes the right to return to their homes in safety and dignity. This requires more than lip service. It necessitates improvements in security in Kashmir, prosecution of those who threaten returnees, and reconstruction of temples and homes. The Indian government has from time to time announced packages for Kashmiri Hindu (Pandit) return, and after the revocation of Article 370 of the Indian constitution in 2019, there are renewed efforts to resettle Kashmiri Hindus with jobs and transit accommodations. However, the community's trust can be rebuilt only when there is *accountability* for past wrongs.

International human rights observers and legal analysts should keep focus on this issue as part of the broader fight against ethnic cleansing globally. Whether through UN special rapporteurs, or international NGOs, the case of Kashmiri Hindus deserves to be highlighted in reports on religious persecution and mass atrocities. Doing so helps ensure it is not seen in isolation or as a footnote, but rather as part of the global “Never Again” effort.

In the end, the **Kashmiri Hindu ethnic cleansing stands as a grave atrocity that satisfies the definitional elements of crimes against humanity and meets many criteria of genocide under international law**. Justice mechanisms - both domestic and international - are needed to address it. As one senior Pandit leader remarked, it is not revenge the community seeks but recognition and justice: *the truth of what happened, punishment for those who orchestrated it, and guarantees of non-recurrence*. The passage of over three decades has not dimmed the community's yearning for these outcomes. On the contrary, the intervening years of displacement and diaspora life have only reinforced the sense of loss and betrayal.

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- South Asia Terrorism Portal assessment of the Pandit exodus and its systematic nature.



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