

PROTECTING PERSECUTED CHRISTIANS IN NIGERIA

Defending those who suffer for their faith

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NIGERIAN LEGISLATION ALERT

Senate Bill 1034 — Foreign Aids (Regulation, Transparency and Disclosure) Bill, 2026

October 7, 2026

The Honorable Riley M. Moore
U.S. House of Representatives
1337 Longworth House Office Building
Washington, DC 20515

Re: Urgent alert on Nigerian Senate Bill 1034 and its threat to independent religious-freedom documentation, faith-based humanitarian access, U.S. security awareness, and strategic interests

Dear Congressman Moore:

Our broad coalition of NGO leaders, human rights and religious freedom advocates wish to alert you to pending Nigerian legislation that directly implicates the work you have led in Congress to protect persecuted Christians in Nigeria, condition U.S. assistance on measurable progress, and preserve independent reporting of atrocities. The bill also raises broader U.S. national security concerns because it could expose or deter the local partner networks that provide time-sensitive information, early warning, and humanitarian access in areas where U.S. visibility is already difficult.

Senate Bill 1034, the Foreign Aids (Regulation, Transparency and Disclosure) Bill, 2026, sponsored by Senator Ibrahim Hassan Dankwambo (PDP, Gombe North), was introduced on May 6, passed second reading on July 22, and was referred to the Senate Committees on National Planning and Economic Affairs, Finance, and Foreign Affairs. As of this writing it has not reached third reading or the House of Representatives, but it remains under active committee consideration.

WHAT THE BILL WOULD DO

SB. 1034 would create a Foreign Aid Regulatory Commission (FARC) with authority to register, inspect, audit, sanction, suspend, and shut down organizations that receive foreign grants, donations, or technical assistance. Covered recipients include independent civic actors, human rights defenders, legal aid providers, humanitarian organizations, and faith-based groups. In its current form the bill would:

1. Require registration of any foreign aid within 30 days of receipt, with failure to register treated as a criminal offense;
2. Mandate public disclosure of sources, amounts, purposes, conditions, implementing partners, and funded activities in a nationally accessible register;
3. Require foreign-funded activity to “align” with Nigeria’s national development plans and priorities — a standard broad and vague enough to brand documentation of rights violations as “out of alignment”; and
4. Authorize severe penalties, including fines reported at up to ₦20 million, imprisonment of up to five years, and suspension or revocation of operating licenses.

WHY THIS MATTERS FOR RELIGIOUS FREEDOM AND U.S. SECURITY

Transparency in public finance is a legitimate objective. This bill, however, is not a narrow anti-corruption measure. It would place independent churches, humanitarian partners, legal defense funds, and researchers who document attacks on Christian communities under a political commission with discretionary power to starve them of support.

This risk is not theoretical. After its September 2026 plenary, the Catholic Bishops' Conference of Nigeria called on the National Assembly to halt the bill, objecting to language that would allow authorities to refuse registration when activities are deemed not "in the national interest." Human Rights Watch, SERAP, the Nigerian Guild of Editors, and the Nigeria Network of NGOs have issued similar warnings.

A rigid 30-day registration deadline, coupled with penalties for non-registration and implementation of unapproved projects, risks criminalizing or deterring rapid-response humanitarian grants, legal defense funds, emergency relocation of survivors, and other time-sensitive work. Mandatory public listing of partners, witnesses, and survivors could expose local organizations and community intermediaries to retaliation or coercion. The identification of individuals and organizations by name would create a list of priority targets for bad actors. A vague "alignment" test would give the State broad discretion over organizations that document violence and official inaction.

POTENTIAL HUMANITARIAN, SECURITY, AND GEOPOLITICAL IMPACT IF ENACTED

If SB. 1034 becomes law in its present form, the most immediate effect could chill independent reporting. Churches, diocesan justice and peace commissions, legal aid clinics, and humanitarian partners would have reason to delay or withhold publication of attack data, sever local partnerships, conceal victim identities, or decline sensitive work rather than risk public exposure, criminal liability, or a finding that their activities are not aligned with national priorities.

The 30-day registration clock could freeze emergency relocation and legal defense for pastors, witnesses, and displaced families. Public listing of implementing partners would hand hostile actors a map of congregations already targeted by Fulani militants, Boko Haram, and ISWAP. Over time, Congress, the Department of State, and the U.S. Commission on International Religious Freedom would receive a thinner, more state-managed account of conditions on the ground — precisely when U.S. law conditions assistance on measurable protection of Christians, H.R. 7457 requires a reliable accounting of persecution and of aid delivered through faith-based partners, Nigeria remains designated a Country of Particular Concern, and U.S. policy is demanding more reliable evidence of violence, accountability, and assistance outcomes

REQUESTED CONGRESSIONAL ACTION

International advocates, including an IRF Roundtable Africa Working Group letter now being directed to Nigerian Senate President Godswill Akpabio, have asked that SB. 1034 be withdrawn or substantially amended. We respectfully request that your office:

1. Raise SB. 1034 with the Department of State, USAID successor offices and the U.S. Embassy in Abuja, and request a written assessment of the bill's effect on civic space, religious freedom documentation, and U.S.-supported humanitarian partners;

2. Urge Nigerian counterparts — including the Senate President, relevant committee chairs, and the Tinubu administration — to withdraw the bill or amend it to add explicit safeguards for human rights defenders, faith-based organizations, and confidential protection work;
3. Insist that any future Nigerian legislation affecting civic space and foreign funding align with Nigeria’s Constitution, the U.N. Declaration on Human Rights Defenders, and Nigeria’s international obligations, and be developed only after structured consultation with defenders and faith communities;
4. Press for explicit legal protection of confidentiality for defenders, survivors, witnesses, community monitors, implementing partners, and other at-risk persons supported through foreign funding, including exemption from public-disclosure rules where disclosure would endanger safety;
5. Treat movement of this bill as a relevant factor in ongoing CPC diplomacy, assistance-conditionality certifications, bilateral security cooperation, and any further appropriations or authorizing language on Nigeria.
6. Seek specific exemptions or safeguards for emergency humanitarian assistance, confidential protections, early-warning networks, and other security-sensitive partnerships, together with an expedited process that prevents registration requirements from interrupting lifesaving or time-sensitive operations.

The Africa working group letter to President Akpabio also asks Nigeria to create an expedited track for emergency protection funding — legal defense, medical care, and relocation of defenders at risk — outside the ordinary registration timelines and penalties. We endorse that request.

Thank you for your immediate attention to this matter.

With respect,

Hon. Sam Brownback

Ambassador at Large (2018-2021)
International Religious Freedom Office
U.S. Department of State

Dede Laugesen

President and Chief Executive Officer
Save the Persecuted Christians

cc: Hon. Christopher H. Smith, Chairman, House Foreign Affairs Subcommittee on Africa; Hon. Tom Cole, Chairman, House Committee on Appropriations; U.S. Commission on International Religious Freedom; Office of International Religious Freedom, U.S. Department of State

Att: Additional 44 signatories and 49 organizations

ADDITIONAL SIGNATORIES (with titles for identity only)

Hon. Frank Wolf Former Congressman (VA, 1981-2015) USCIRF Commissioner (2022-2025)	Scott Morgan Co-Chair Africa Working Group IRF Roundtable	Eric Metaxas Host of “The Eric Metaxas Show” Author, “Letter to the American Church”
Suzanne Bock Grishman Executive Director Mercury One & The Nazarene Fund	Frank J. Gaffney President & Founder Institute for the American Future	Rev. Kevin Jessip President The Return
Ryan Brown President / CEO Open Doors US	Troy A. Miller President and CEO National Religious Broadcasters	Dr. Charles Jacobs President International Freedom Coalition
Dr. Oluwasayo Ajiboye President Mission Africa International	Faith McDonnell Director of Advocacy Katartismos Global	Dr. Gloria Puldu Samdi Coordinator LEAH Project
Charmaine Hedding President Shai Fund	Stephen Osemwegie President and Founder Save Nigeria Group USA	Dr. William Devlin CEO Widows and Orphans
Dr. Jorge Parrott President Christ's Mandate for Missions	Martha Hudson MENA Senior Advisor International Religious Freedom Advocate	Dr. Gregory Stanton Founding President Genocide Watch
Phillip Cohn President Christ for All Peoples	Dr. Deji Dada Lecturer and Researcher Church Business Administration	George Parker Executive Director Revealing Light Ministries
Jason Jones President The Vulnerable People Project	Ellen Grigsby Director of Strategic Relations Frontlines International	Patricia Streeter Co-Leader Anglican Persecuted Church Network
Karmella Borashan VP, Chair of Advocacy & Government Relations Assyrian International Council	Kevin Freeman Founder NSIC Institute	Patrice Pederson President First Freedom Foundation
Ronald Polomsky Faith-in-Action Leader Colorado Christian Advocate	Mathew Oladele Program Director Initiative for Social Development in Africa (iSODAF)	Lauren Homer President Law and Liberty Trust

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The Vietnamese American
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Ellen Fantini
Co-founder
Center for Western Culture

Deana Brown
CEO
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(FSI)

SUPPORTING ORGANIZATIONS

Accountability Lab Nigeria
Africa Working Group of the IRF Roundtable
Anglican Persecuted Church Network
Antelope Valley Vietnamese Association
Boat People SOS (BPSOS)
Brownback Group
Buddhist Solidarity Association
Cao Dai Tay Ninh Temples of TX
Central European Perspective Foundation
Christ for All Peoples
Christ's Mandate for Missions
Christian Association of Nigerian Americans
Christian Awareness Initiative of Nigeria
Christian Freedom International
Daniel Khokhar Foundation
Freedom Seekers International (FSI)
Friends of Thien Am Zen Monastery
Gee Foundation for Social Justice and Development
Genocide Watch
Glorious gospel Mission Ministries Inc
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Law and Liberty Trust
LEAH Project
Mercury One & The Nazarene Fund
Mission Africa International
Montagnards Stand for Justice (MSFJ)
National Religious Broadcasters
NationsNet.org
NSIC Institute
Open Doors US
Prayer Pioneers
Revealing Light Ministries
Save Nigeria Group USA
Save the Persecuted Christians
Saigon4Saigon Movement
Shai Fund
SIT St. Lawrence
The Return
The Vietnamese American Unified Buddhist Congress
The Vulnerable People Project
Vietnamese American Community of the USA
Vietnamese Community of Minnesota
Vietnamese Women for Human Rights
Widows and Orphans