

THE ENCYCLOPEDIA OF GENOCIDE: A CRITICAL ANALYSIS

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The Encyclopedia of Genocide is claiming to be a “basic and comprehensive reference work” on the Genocide Studies. It includes major sections on the Holocaust, Denial of Genocide, Comparative Study of the Genocides of All Peoples, Process of Genocide, Early Warning Systems for Genocide, legal deterrents and punishment in Law and Genocide, other means of Prevention of Genocide and, of course, “The Armenian Genocide” which makes this two-volume Encyclopedia to fall within the scope of Armenian Studies. Israel W. Charny is the editor in chief of the two-volume Encyclopedia composed of 670 pages and published in 1999 in Santa Barbara, California by ABC-CLIO, Inc.

As a well known fact the term genocide has controversial meanings. It is observed that there is a tendency to overuse or misuse “genocide”. As rightly pointed out by Samuel Toffen “Many use the term to simply “hype” their issue or cause”.¹ It is also true that when it is used in a loose manner it distorts the meaning of the term and diminishes the significance of those actions that constitute true genocides, such as the Holocaust. On the other hand, equally true that, any restrictive use of the term “genocide” would exclude the real genocides. This also brings the issue of the uniqueness of Holocaust into question. The uniqueness, or universality, of the Holocaust is well discussed, bringing the balanced arguments for and against each view by the Encyclopedia of Genocide. The question remains how to decide whether a given case is genocide or not. The most appropriate solution for this question could be found in the legal approach. First of all, genocide is a legal term which is coined by Lemkin whose efforts helped the formation of a Genocide Convention in 1948. The United Nations Convention on Genocide was discussed by Balint as a separate entry to the Encyclopedia, pointing also to the shortcomings of the Convention to which more than 125

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¹ *The Encyclopedia of Genocide*, (Santa Barbara: ABC-CLIO Inc., 1999), p.35.

countries are party.² Despite criticism mainly by non-lawyers, the Convention's definition is the only authority in the legal sphere. This argument is also supported by the fact that the 1998 Rome Statute of the International Criminal Court adopted the same definition after all these fifty years. The definition of "genocide" by the Convention also discussed by Charny who pointed out that many events will be disqualified from being labeled genocide if there is an obligation to establish "clear-cut specific intent".³ In a recent paper Aktan argues that intent is definitely required and therefore the 1915 cannot be called a genocide.⁴ It is obvious that the editor in chief of the Encyclopedia of Genocide is in conflict with the UN Convention according to which "genocide means any of the following acts committed with *intent* to destroy, in whole or in part, a national, ethnical, racial or religious group, as such: (a) killing members of the group; (b) Causing serious bodily or mental harm to members of the group; (c) *Deliberately* inflicting on the group conditions of life *calculated* to bring about its physical destruction in whole or in part; (d) Imposing measures *intended* to prevent births within the group; (e) Forcibly transferring children of the group".⁵ The requirement of intent is not only laid down by the Convention in the first paragraph of the article on the mental element of the crime of genocide, i. e. intent, but also some acts in the listing of the material element of genocide makes reference to the intention of perpetrator, as underlined above. From a legal point of view, it is impossible to speak of the crime of the genocide if one element, either intent or genocidal acts, is missing. Professor Schabas, who wrote a brick-thick book on genocide in international law, is also of this opinion.⁶ It could be said on the Encyclopedia of Genocide that it neglects the law of genocide, an important shortcoming of a such comprehensive reference book.

The Encyclopedia of Genocide gives many balanced views on different cases and issues, as an example of the uniqueness of the Holocaust is given above. Surprisingly, or not, this balanced approach disappears when it comes to the Armenian case. All the

² *The Encyclopedia of Genocide*, pp. 575-577.

³ *The Encyclopedia of Genocide*, p. 14.

⁴ Gündüz Aktan, 'The Armenian Problem and International Law' in Türkkaya Ataöv (ed.), *Armenians in the Late Ottoman Period*, (Ankara: Turkish Historical Society, 2001), pp. 288-294.

⁵ Article 2, italics added.

⁶ William A. Schabas, *Genocide in International Law*, (Cambridge: Cambridge Uni. Press, 2000), pp-206-313.

entries on the Armenian issues are either written by Armenians or scholars to be known as the committed supporters of the Armenian view, among them Vahakn Dadrian and Rouben Adalian. The reader would be more satisfied if the counter arguments were also presented without labeling them "denial". In the entry titled "The Armenian Genocide" is nothing new but same old Armenian allegations. Adalian begins with describing Armenians "lived as second class citizens subject to legal restrictions that denied them normal safeguards" whose neither lives nor properties were guaranteed security.⁷ He further argues that the new Ottoman Government led by the Committee of Union and Progress (CUP) expoused an ultranationalistic ideology according to which non-Turks were to be eliminated and the CUP used the war time circumstances to destroy the Armenians stood between the Turks of Anatolia and Central Asia.⁸ For an ordinary reader who has not in depth-knowledge of history, the reasoning for a genocide of Armenians is obvious: 1. Turks who are Muslims hated Christian Armenians 2. Armenians are treated as second class and as soon as the Turks had opportunity they destroyed the whole Armenian population. This clearly a genocide because intent is there and genocidal acts are committed, if proved. However, these need to be supported by the facts. Otherwise they prove to no avail.

A reader on the Ottoman history would be expected to be aware of the status of the non-Muslims in the Ottoman legal system. The principles upon which non-Muslims were governed have their roots in the earlier traditions of Persian and Roman rule and Islamic norms. Jews, Christians and Zoroastrians had a special place in Islam. They are all called "People of Book" and allowed to live in a country governed by Muslims as long as they accepted the Muslim rule and paid special taxes. In the fifteenth century Sultan Mehmet II established the *millet system* to facilitate coexistence between the different ethnic and religious groups. After his conquest of Istanbul in 1453, Mehmet II vested the new Greek patriarch, Gennadius, with ecclesiastical and civil authority over his coreligionists of the Empire and invited Bishop Jovakim, the Armenian primate of Bursa, to Istanbul in 1461 and conferred upon the title of "patriarch", thus placing him on the same footing as the patriarch of the Greek community. By implementing *the millet system*, the Ottomans restored peace and order in the

⁷ *The Encyclopedia of Genocide*, p. 61.

⁸ *The Encyclopedia of Genocide*, pp. 64-68.

classical period. The Ottoman Empire reached its height in the sixteenth century. The decline also started in this century, becoming more apparent in the following centuries. In 1839 a reform edict was issued in Gülhane in the name of the sultan. The principle of equality of persons of all religions is recognized by the edict. However, in practice, it is not to be supposed that the immediate equality for all Ottoman subjects was to be secured. Therefore, in 1856 another reform edict renewed the commitments of 1839; guaranteeing free exercise of religion, charge of their own belongings, access to public employment, equal taxation and equality before the law. In 1876, constitutional monarchy was proclaimed and the parliament convened. The constitution granted all subjects equal rights and liberties.⁹ As a result, between 1876-1915 twenty nine Armenians served in the highest governmental rank of pasha; twenty two served as ministers, including the ministers of foreign affairs, finance, trade and post; thirty three served as members of the parliament; seven served as ambassadors; eleven served as consuls-general, eleven served as university professors; and forty one served as other officials of high ranks.¹⁰ This overview demonstrates that the proposition that the Armenians were treated second class citizens and deprived of rights is unfounded. The striking point that just before 1915 Armenian citizens of the Empire served in the highest bureaucracy, therefore, it is impossible to find any anti-Armenian feelings in the Ottoman society and administration.

The Ottoman Empire did not fully experience the Renaissance. The decline of the Empire brought corruption and oppression to all subjects, irrespective whether they were Muslims and non-Muslims. Most striking of all was the armed forces. In some provinces they became oppressive, taking without payment whatever they wanted from the population, again notwithstanding whether it was Muslim and non-Muslim. The first Ottoman Armenians who received advanced Western education were sent to Italy.¹¹ Others went to various European capitals. In Europe most of these young men were given the opportunity to acquaint themselves with constitutional political systems and progressive ideas, including positivism and materialism. Many Turkish

⁹ Yves Ternon, *The Armenians*, (Delmar:Caravan Books, 1981), pp. 37, 38 and 49.

¹⁰ Jamanak, *Facts from the Turkish Armenians*, Istanbul, 1980, p. 4.

¹¹ Artinian, *The Armenian Constitutional...*, p. 59.

Ottoman students in Europe experienced the same. They compared their falling country's conditions with those of European ones and developed ideas for securing the welfare of their societies and reforming the political system. The first Armenian societies were non-political, aiming at especially expanding education among the members of the Armenian *millet*. For example, on 27 April 1849 the Young Armenians formed the Ararat Society in Paris, which brought together almost all the Armenian students in the French capital. They declared that "... the happiness of a nation can only come through education...(The Ararat Society) is to bring progress to the Armenian nation and to provide for all its needs" in their society's program. Most of the European-educated students took important posts in the civil service of the Ottomans.¹² However, not all Armenian organizations had this kind of innocent aims. Especially towards the end of the nineteenth century, many revolutionary organizations with armed sections were formed. The Union of Salvation and the Black Cross were created in Van in 1872 and 1878 respectively. The Protectors of Fatherland was formed in Erzurum in 1881. The first non-local Armenian revolutionary party was the Armenekan, founded in Van in 1885. The Armenekan expanded to Muş, Bitlis, Trabzon, Istanbul and even Russia and Iran. The Armenekan bought and smuggled arms and engaged terrorist activities. This was followed by the Revolutionary Hunchak Party, created in 1887 in Geneva, and the Armenian Revolutionary Federation (commonly called by the name of the Dashnak Party) formed in 1890 in Tiflis. Although all were called parties, what they had common was their military wings which carried out many armed activities, or as called today terrorist activities. The flag of the Dashnaks which had on one side five stars encircling the number sixty one and on the other side the slogan "vengeance, vengeance" and a skeleton makes the aim and the method of the 'party' clear.¹³ It is definitely accepted even by the Armenian nationalist historians that the Armenians tried to take advantage of the entry of the Ottoman Empire in the World War I. For example Nalbandian pointed out that this was regarded by the Armenian revolutionary committees as "the most opportune time to begin a general uprising to achieve their goals".¹⁴ In early April 1915 the

¹² Artinian, *The Armenian Constitutional...*, p. 65.

¹³ Ternon, *The Armenians*, pp. 74-82.

¹⁴ Louise Nalbandian, *Armenian Revolutionary Movement*, (Los Angeles: University of California Press, 1963), pp. 110-111.

Armenian uprising in Van began. Coupled with the Russian advance, the government ordered their own Muslim population to evacuate the city. Many Muslims suffered and lost their lives during the process of evacuation. It is clear that it was the bloody Armenian rebellion in Van that left no alternative to the Ottoman government but relocate those citizens deemed disloyal and rebellious in other parts of the Ottoman territory. On 27 May 1915, the Ottoman Empire passed a law for the resettlement of the people who posed security threat to the Ottoman Army. This obviously included especially the Armenians who were engaged in rebellious activities. The relocation was painful because displacing thousands of people and resettling them was not an easy task. The year 1915 witnessed the killing of some Armenians by some elements of the local Muslim population for revenge on their route to their new settlements. Some government officials also contributed to these crimes. The 1915 relocation was not a total campaign directed against the Armenians, as an infamous Armenian author accepts that sometimes the Armenian Catholics and Protestants as well as the Armenians of Istanbul and Izmir were exempted from the relocation decrees.¹⁵ As pointed out by Halaçoğlu, of course, when some those allowed to stay were seen engaged in harmful activities, they, too, were relocated irrelevant of their creed.¹⁶ A detailed examination of the Ottoman legal documents on the 1915 relocation makes it clear that not only the extermination of the Armenians was out of question, but also the government made it clear that anyone committed crimes against the population relocated would be punished severely. As a matter of fact, before the end of war 1,397 were sentenced with more than half of them being executed by the CUP administration.¹⁷

In order to prove that the Turks committed a genocide against the Armenians the Encyclopedia of Genocide refers to some sources among which are: the Andonian Documents, US news reports, Treaty of Sevres, Ottoman Military Tribunal Verdicts and a decision of Permanent People's Tribunal. All sources cited by the Armenian view's supporters were examined in detail and counter-

¹⁵ Richard G. Hovannasian, 'Etiology and Sequele of the Armenian Genocide', in George J. Andreopoulos (ed.), *Genocide: Conceptual and Historical Dimensions*, (Philedelphia: University of Pennsylvania Press, 1994), p. 124.

¹⁶ Yusuf Halaçoğlu, 'Realities behind the Relocation' in Türkkaya Ataöv, *The Armenians in the Late Ottoman Period*, (Ankara: Turkish Historical Society, 2001), p. 122.

¹⁷ Kamuran Gürün, *The Armenian File*, (London: K. Rustem and Bro., 1985), p. 259.

arguments were advanced by scholars on Armenian Studies. However, since these sources are still being used as proves of a genocide, each will be touched upon briefly as long as the borders of this review allow.

By the end of the World War I, the ruling CUP's leading figures fled from the country and a new government with strong opposition, if not hostility to, the former ruling party was installed by the sultan. The new government formed a special Court Martial whose statutes were set forth on 8 May 1915. The principal task of the tribunal was the investigation of the alleged "massacres and unlawful personal profiteering" as well as the charge of "overthrow of the government".¹⁸ The second task makes it clear that the tribunal directly involved in politics and the punishment of those associated with the former governing party. The political considerations of the special tribunal were reflected on its composition and decisions as well as the way it operated. It was composed of non-professionals of law, composed of Armenian members who may have not been completely unbiased, operated under pressure, sometimes with intervention, of the government and Allies which occupied Istanbul, relied on the testimonies of the people who had never been to the places where the massacres allegedly taken place and testimonies of the children who were even under the age of five as eye-witnesses.¹⁹ As a result it would not be correct to say that the Turks after the war recognized the genocide and the current Turkish government should do so. As a matter of fact, the first Turkish Grand National Assembly cleared the names who were found guilty and executed by the so-called Ottoman Military Tribunal and in 1926 a law to give financial support for the families of those who were executed by the Court Martial was enacted. Therefore, it is far from convincing to rely on the verdicts delivered by the Ottoman military tribunal, as did Vahakn Dadrian in the Encyclopedia of Genocide.²⁰

There were also attempts to bring those who were allegedly responsible for crimes committed against the Armenians before a

¹⁸ *Takvimi Vekayi*, No: 3540, 5 May 1919 and *Takvimi Vekayi*, No: 3571, 13 June 1919.

¹⁹ See Senol Kantarcı, "Speeches on the Armenians Attributed to Atatürk and his Help to the Victims of Armenian Terrorists and 'Court Martials'" *Armenian Studies*, Vol. 1, Issue 4 and Nejdet Bilgi, *Ermeni Tehciri ve Boğazlayan Kaymekemi Mehmed Kemal Beyin Yargılanması (Armenian Relocation and the Trial of Governor of Bogazlayan Mehmet Bey)*, (Ankara: Köksav, 1999).

²⁰ *The Encyclopedia of Genocide*, pp. 87-89.

court of law. The Encyclopedia of Genocide rightly quotes a joint declaration by France, Great Britain and Russia.²¹ As the relocation was beginning, the Allies issued a joint declaration on 24 May 1915. They alluded to the “assistance of Ottoman authorities” in harming the Armenians and announced that “they will hold personally responsible ... all members of the Ottoman government and those of their agents who are implicated in such massacres”.²² This declaration is a result of the wide coverage by the European and US press of the relocation which was presented by the Armenian committees abroad as an attempt to massacre of the Armenians. It is true that some US papers presented the Armenian dead as 1,000²³ and 9,000²⁴ while again the same sources put victims at 500,000²⁵ and 1,000,000.²⁶ The huge disagreement on numbers is readily obvious. The striking point is this all the numbers were provided by the same source, i.e. The New York Times reported on the information provided by the Armenian committees. However, it seems that the Ottomans were confident and made an attempt to form an international tribunal which requested two lawyers each from Denmark, Spain, Sweden and Holland “to participate in the international committee to be formed to investigate if any injustices were made during relocation”.²⁷ The delegates of the international committee were to visit places where the alleged massacres occurred to make investigations and to establish the facts which would have led to prosecution of alleged criminals. But the attempt failed and the British decided to prosecute the accused themselves. The British took measures for the transfer of the detainees, who were arbitrarily arrested by the new government in Istanbul, often, by the directives of the occupying Allied forces, to British custody in Malta.²⁸ The total number of the Malta deportees were more than one hundred and forty. The prominent members of the Turkish society, like the former Grand Vizier, speaker of parliament, chief

²¹ *The Encyclopedia of Genocide*, p. 82.

²² FO 371/2488/51010 (28 May 1915) (Also cited by Vahakn N. Dadrian, ‘Genocide as a Problem of National and International Law: The World War I Armenian Case and Its Contemporary Legal Ramifications’ *The Yale Journal of International Law*, Vol. 14, No. 2, 1989, p. 262.)

²³ *New York Times*, 20 August 1915, quoted by *the Encyclopedia of Genocide*, p. 75.

²⁴ *New York Times*, 4 August 1915, quoted by *the Encyclopedia of Genocide*, p. 75.

²⁵ *New York Times*, 24 September 1915, quoted by *the Encyclopedia of Genocide*, p. 75.

²⁶ *New York Times*, 1 November 1915, quoted by *the Encyclopedia of Genocide*, p. 75.

²⁷ BOA, HR:MÜ. 43/17, 6 May 1919.

²⁸ Dadrian, *Genocide as a Problem of...*, p. 285.

of general staff, ministers, members of parliament, senators, army commanders, governors, university professors, editors, journalists composed the deported.²⁹

On 4 August 1920, the British Cabinet decided that "The list of the deportees be carefully revised by the Attorney General with a view to selecting the names of those it was proposed to prosecute, so that those against whom no proceedings were contemplated should be released at the first convenient opportunity."³⁰ And the Attorney-General wrote to the Foreign Office that the "British High Commissioner at Istanbul should be asked to prepare the evidence against those interned Turks whom he recommends for prosecution on charge of cruelty to native Christians."³¹

Sir Harry Lamb, the political-legal officer of the British High Commission at Istanbul, stated on the issue of evidence of the alleged massacre:

"No one of the deportees was arrested on any evidence in the legal sense...The whole case of the deportees is not satisfactory...There are no dossiers in any legal sense. In many cases we have statements by Armenians of differing values...The Americans must be in possession of a mass of invaluable material..."³²

Then, the British Foreign Office decided to ask the assistance of the US State Department. On 31 March 1921, Lord Curzon telegraphed to Sir A. Gedes, the British Ambassador in Washington, the following:

"There are in hands of His Majesty's Government at Malta a number of Turks arrested for alleged complicity in the Armenian massacre...There is considerable difficulty in establishing proofs of guilt...Please ascertain if United States Government are in possession of any evidence that would be of value for purposes of prosecution."³³

The Embassy returned the following reply:

"I regret to inform Your Lordship that there was nothing therein which could be used as evidence against the Turks

²⁹ Bilal N. Şimşir, *The Deportees of Malta and the Armenian Question*, (Ankara: Foreign Policy Institute, 1992), pp. 18-33.

³⁰ FO 371/5090/E.9934: Cabinet Officer to Lord Curzon of 12.8.1920.

³¹ FO 371/6499/E.1801: Law Officers to Foreign Office of 8.2.1921.

³² FO 371/6500/E.3554: Inclosure, minutes by Sir H.Lamb, dossier Veli Nedjdet.

³³ FO 371/6500/E.3552: Curzon to Geddes. Tel No 176 of 31.3.1921.

who are being detained for trial at Malta. The reports seen...made mention of only two names of the Turkish officials in question and in these case were confined to personal opinions of these officials on the part of the writer, no concrete facts being given which could constitute satisfactory incriminating evidence...I have the honour to add that officials at the Department of State expressed the wish that no information supplied by them in this connection should be employed in a court of law...Having regard to this stipulation and the fact that the reports in the possession of the Department of State do not appear in any case to contain evidence against these Turks..., I fear that nothing is to be hoped from addressing any further enquiries to the United States Government in this matter."³⁴

The Attorney-General's Department returned the following reply:

"...It seems improbable that the charges made against the accused will be capable of legal proof in a Court of Law...Until more precise information is available as to the nature of the evidence which will be forthcoming at the trials, the Attorney-General does not feel that he is in a position to express any opinion as to the prospect of success in any of the cases submitted for his consideration."³⁵

Upon the receipt of this reply, W.S. Edmonds, Under-Secretary in the Eastern Department of the Foreign Office, minuted:

"From this letter it appears that the chances of obtaining convictions are almost nil... It is regrettable that the Turks have confined as long without charges being formulated against them..."³⁶

Sir H. Rumbold, the High Commissioner in İstanbul, wrote:

"Failing the possibility of obtaining proper evidence against these Turks which would satisfy a British Court of Law, we would seem to be continuing an act of technical injustice in further detaining the Turks in question. In order, therefore, to avoid as far as possible losing face, in this matter, I consider that all the Turks... should be made available for exchange purposes."³⁷

³⁴ FO 371/6504/E.8515: Craigie, British Charge d' Affaires at Washington, to lord Curzon, No.722 of 13.7.1921.

³⁵ FO 371/6504/E.8745: Procurator-General's Department to the Under Secretary of State for Foreign Affairs, 29.7.1921.

³⁶ *Ibid*: Minutes by Mr. Edmonds of 3.8.1921.

³⁷ FO 371/6504/E.10023.

From now on, the Turkish detainees at Malta were not considered as "offenders" for prosecution, but rather as "hostages" for exchange against British prisoners in Anatolia.³⁸ Subsequently all Turkish deportees at Malta were exchanged with the British prisoners of war. The Law Officers of the Crown abstained from accusing anyone of Turkish deportees of massacre of the Armenians and all Turkish deportees were released and repatriated without being brought before a tribunal. The incident of the Malta detainees makes it clear that the British could not find any evidence to prosecute the alleged criminals of the crimes against the Armenians. This also clarifies that the coverage of the 1915 Relocation by the US press was not supported by the reliable sources of information. In the same column, the Encyclopedia of Genocide cites the telegrams by Talat Pasha who was a leading figure in the Ottoman war time administration. The telegrams according to which Talat ordered the extermination of the Armenian population are brought as evidences of the genocide.³⁹ This is a well known strategy of the supporters of the Armenian view.⁴⁰ However, the Armenian sources avoids from using these telegrams anymore. The main reason for this is that the Andonian documents are proven forgeries.⁴¹ The signatures on them are not authentic. The numbers given to the documents do not correspond to the numbers of the Ottoman official documentation system. Even the dates put on the documents do not match the dates of the Ottoman official documents. It seems absurd that the Encyclopedia of Genocide claiming to be a "basic and comprehensive reference work" keeps referring to these forged documents. Had the telegrams attributed to the war time Ottoman officials be authentic, it would have been illogical for the British not to use them.

The Encyclopedia of Genocide also uses two sources that the reader could regard them as legally binding to prove the genocide, namely some provisions of the Treaty of Sevres⁴² and a decision

³⁸ Şimsir, *The Deportees of Malta...*, pp.45-48.

³⁹ *The Encyclopedia of Genocide*, p. 96.

⁴⁰ See for example Vahakn N. Dadrian, 'The Naim-Andonian documents of the World War I and Destruction of the Ottoman Armenians: The Anatomy of Genocide' *International Journal of Middle East Studies*, Vol. 18, No. 3 (1986), pp. 311-360.

⁴¹ See for details Türkaya Ataöv, *The Andonian "Documents" Attributed to Talat Pasha Are Forgeries* (Ankara: Sistem Ofset, 1984).

⁴² *The Encyclopedia of Genocide*, p. 86.

of the Permanent Peoples' Tribunal.⁴³ First of all the Treaty of Sevres is not a binding material from a legal point of view. It is true that it was signed by all parties on 10 August 1920. However, none of its signatories except Greece ratified it. Even Armenia itself did not ratify the document. Therefore it never came to force. Similarly Permanent Peoples' Tribunal which is said "found Turkey guilty of committing the crime of genocide" on 13-16 April 1984 has no jurisdiction at all.⁴⁴ As understood from its formation and practices it is an organization without any juridical power. Only the politically oriented issues are dealt with it and it makes calls to states to adopt policies in accordance with its decisions. The citation of its decision on 1915 could be deceiving. Its legal status must have been made clear by the Encyclopedia of Genocide to prevent such a misunderstanding.

After all, the Encyclopedia of Genocide is an attempt to create a reference book on Genocide Studies. The reader should be cautious about all the information provided by it, because it is far away giving balanced and unbiased arguments on the Armenian issues. If it is correct for one section, why not it is not be the same for other sections. This definitely damages the reliability of the Encyclopedia. It is hoped that the editors will consider the criticism about the Encyclopedia and make necessary alterations to the full satisfaction of the reader and scholars of the Genocide Studies.

⁴³ *The Encyclopedia of Genocide*, pp. 82-85.

⁴⁴ *Quoted by the Encyclopedia of Genocide*, p. 82.