



I. EXECUTIVE SUMMARY

1. The following report is submitted jointly on behalf of the Assyrian Universal Alliance - Americas Chapter (AUA Americas)¹ and the Assyrian Advocacy Group (AAG)² for consideration in the Republic of Turkey's second Universal Periodic Review (UPR) to take place during the 21st session of the UPR Working Group.

2. Significant human rights abuses have persisted throughout Turkey since the state underwent its inaugural UPR in May 2010. This report examines those abuses pertaining to the country's indigenous Assyrian Christian minority between May 2010 and June 2014, while acknowledging improvements and positive practices. The human rights abuses raised in this report stem largely from instances of *de jure* and *de facto* discrimination against Turkey's non-Muslim minorities as well as barriers to their religious freedom. Conditions faced by Assyrian Christians have improved in the past decade, particularly due to the reforms undertaken by the government as part of its accession process to the European Union. However, Ankara should continue to implement further reforms to alleviate the remaining human rights violations affecting the community.

3. Three thematic human rights issues form the outline of this report; namely: (A) freedom of religion or belief; (B) the rights of ethnic, religious and linguistic minorities; and (C) freedom from forced eviction. In order to help cure the violations alleged here, AUA Americas and AAG offer the following recommendations to the Government of Turkey:

- Ensure that interests of religious minorities are adequately incorporated in the work of state institutions.
- Repeal or reform laws and regulations so as to prohibit the inclusion of religious affiliation on government documents and national ID cards.
- Remove all bureaucratic and administrative obstacles preventing non-Muslim communities from freely opening places of worship.
- Provide religious minorities safeguards to freely observe religious holidays without repercussion.
- Repeal or reform all laws banning the establishment and operation of non-Muslim theological seminaries and religious schools.
- Repeal or reform all laws prohibiting the establishment of political parties based on minority status.
- Revise all textbooks to remove statements disparaging Turkey's non-Muslim communities.
- Ratify the UNESCO Convention against Discrimination in Education.
- Promptly restore all unlawfully expropriated property belonging to minority foundations.

II. INTRODUCTION

4. Assyrians³ in Turkey identify as a distinct ethno-religious community with a heritage linked to the civilizations of Mesopotamia. They are predominantly Syriac speaking, politically non-dominant,



profess to various traditions of Christianity and were historically the first to settle in many of the territories they currently reside.⁴ As such, Assyrian Christians fall within the criteria of indigenous peoples adopted by the UN's Permanent Forum on Indigenous Issues and should be entitled to those rights afforded to members of indigenous communities.⁵

5. The Assyrian Christian community in Turkey historically inhabited the country's Southeastern Anatolian Region, in the provinces of Mardin, Diyarbakir, Hakkari and Şırnak.⁶ Until shortly after the founding of the Turkish Republic, these regions served as the seat of patriarchs of various Assyrian Christian denominations for centuries.⁷ As a result of political instability and a lack of economic opportunities, less than 10% of Turkey's pre-World War I Assyrian Christian population remains in the country.⁸ Most Assyrian Christians in Turkey are now concentrated outside of their ancestral homeland and in major cities like Istanbul. In the 1950s, Assyrian Christians in Istanbul totaled around 60,000 to 70,000, but that number has now dropped to roughly 15,000.⁹ More are electing to relocate to Europe as a result of the discrimination endured by their minority status, furthering the likelihood that the country will soon be cleansed of its millennial old Syriac speaking Christian community.

6. The current socio-political situation of Assyrian Christians and other minorities in Turkey remains precarious. Between 2010 to 2014, Turkey has consistently been ranked among the most dangerous countries for minorities by Minority Rights Group International (MRG),¹⁰ labeled either a "Country of Particular Concern" or "Watch List Country" by the US Commission on International Religious Freedom (USCIRF),¹¹ and received "Partly Free" status in Freedom House's annual Freedom in the World report.¹² Recent efforts to redraft Turkey's constitution with input from civil society, associations, foundations, and religious and minority representatives, pointed to a changing trajectory in the government's commitment to better uphold its international human rights obligations. By 2013, however, the country's main political parties failed to reach a consensus on key issues surrounding the new constitution, leaving the redrafting process – as well as with the plight of Assyrian Christians in Turkey – stagnant.

III. ACHIEVEMENTS, BEST PRACTICES AND CHALLENGES

A. Freedom of Religion or Belief

7. Article 24 of the 1982 constitution of the Republic of Turkey stipulates, "Everyone has the freedom of conscience, religious belief and conviction."¹³ Nonetheless, there exist both legal and structural barriers to religious freedom in Turkey, particularly with respect to freedom from discrimination on the basis of religion and the right to manifest one's religion or belief.

1. Freedom from Discrimination on the Basis of Religion

8. Under both the previous 1961 constitution as well as its current 1982 constitution, the Republic of Turkey is regarded as a secular state.¹⁴ Historically however, state institutions have propagated Sunni Islam to the exclusion of minority religions and sects. For instance, while Turkey's Directorate of Religious Affairs (DRA) is apportioned a substantial share of the state budget, no



individuals from non-Muslim communities or even other Muslim denominations are represented within the agency nor do such communities receive public funding.¹⁵ In addition, the Turkey Radio and Television Corporation (TRT), a national public broadcaster of Turkey, has yet to broadcast a single Christian religious festival despite regularly airing prayers during Sunni Muslim holidays in line with the DRA's programming.

9. Under Article 2 of the International Covenant on Civil and Political Rights (ICCPR), differentiation of treatment does not arise to the level of discrimination if the criteria for such differentiation is reasonable, based on objective standards and the government's purpose is legitimate under the Covenant.¹⁶ Categorical exclusion of Turkey's non-Muslim communities from the DRA's activities, particularly in light of state's proclaimed secularism, does not arise out of policies based on objective criteria, but rather on principles that disfavor Turkey's religious minorities. Furthermore, the practice aims to preserve the state's historical preference for Sunni Islam and hence fails to achieve any legitimate purpose under the Covenant. Therefore, the practice of marginalizing religious minorities in the work of such state institutions amounts to the level of discrimination and violates Turkey's commitments under the ICCPR.

10. Societal discrimination against Turkey's non-Muslim communities also persists throughout the country, bolstered in large part by policies allowing for the disclosure of religious affiliation on government documents. The 2010 judgment of the European Court of Human Rights (ECHR) in the case of *Sinan Işık v. Turkey* states that presence of 'religious affiliation' in ID cards itself is a violation of human rights and that the state should be neutral on this issue.¹⁷ The case examined Article 35/2 of Turkey's Population Services Law No. 5490, which stipulates that "[a]ny information concerning an individual's religion shall be entered, amended, deleted or omitted in accordance with that individual's written statements."¹⁸ While the law allows an individual the option to leave his or her religious affiliation blank, it nevertheless contravenes the ECHR's interpretation of freedom of religion by providing a space for which religious affiliation can be stated on government documents. Societal discrimination against those who elect not to reveal their religious affiliation on documents tends to compel such disclosure. Many religious groups have complained that by not including an identity or listing something other than Muslim, individuals were precluded from jobs in the state bureaucracy or government and discriminated against in the private sector.¹⁹ The law was challenged in Turkey's Constitutional Court but the court did not regard the issue of religious affiliation as unconstitutional.²⁰

11. Despite the ECHR's ruling, practices continuing to allow for the inclusion of religious affiliation on government documents further supports institutionalized social discrimination for intimidation and coercion based on religion or belief, particularly with regard to non-Muslim minorities. Article 2(1)(c) of the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD) obligates state parties to "amend, rescind or nullify any laws and regulations which have the effect of creating or perpetuating racial discrimination wherever it exists."²¹ In Turkey, racial minorities comprise much of the country's non-Muslim population.²² As such, laws perpetuating disclosure of their religious affiliation has resulted in a negative bias against the community in both the public and private sector. In order to better uphold its obligations under ICERD, Turkey should repeal or reform laws and regulations so as to prohibit the inclusion of religious affiliation on government documents and national ID cards.



RECOMMENDATION:

- Ensure religious minorities are adequately represented in the work of every state institution.
- Repeal or reform laws and regulations so as to prohibit the inclusion of religious affiliation on government documents and national ID cards.

2. Right to Manifest One's Religion or Belief

12. Impediments to building new churches, barriers to the celebration of Christian holidays and a ban on operating theological seminaries serve as key challenges that prevent Assyrian Christians in Turkey from fully enjoying their right to freely manifest their religion.

13. The construction of a new church is generally fraught with more bureaucratic obstacles than the procedures associated with opening a new mosque.²³ Indeed, Assyrian Christians have not been able to open a new church since Turkey's pre-Republic era. For the most part, many Assyrian Christians in Istanbul rely on renting churches belonging to other Christian denominations in order to provide religious services. A recent decision by the Istanbul Metropolitan Municipality of Yesilköy to allocate an old church with a nearby cemetery to the Syriac Orthodox Church has caused serious debate within Turkey's Christian communities.²⁴ Representatives of the country's Latin Catholic Church have called the decision "unacceptable," asserting that the Catholic Church has owned the land since the 1950s.²⁵ Nonetheless, following the decision by the Foundation of the Syriac-Orthodox Church to continue preparation for building the new church, the city's Council of Monuments rejected the first construction plan, alleging it did not conform to project standards.²⁶

14. Freedom of worship among Christians and other non-Muslim communities is also limited by the lack of legal protections safeguarding their right to observe days of rest and celebrate religious holidays.²⁷ In Turkey, Islamic feasts of Eid ul-Fitr and Eid al-Adha are recognized official holidays and government agencies, banks and many companies remain closed in observance. For Assyrian Christians and other non-Muslim communities, staying home from work to celebrate religious holidays, even without compensation, carries with it the risk of being dismissed from employment or otherwise reprimanded.

15. The Turkish government's monopoly on higher education has resulted in the closure of seminaries belonging to religious minorities, denying these communities the right to train clergy. Currently, 86 Faculties of Theology throughout Turkey provide Islamic training while other religions are taught only from a historical or sociological perspective. At the end of 2013, there were 850 high school and 1367 middle schools serving as seminaries for Muslim clergy known as "imam hatip okullari."²⁸ However, no Christian religious theological seminary or similar teaching institution exists in Turkey. The Greek Orthodox Theological Seminary in Heybeliada was established in 1844 but closed in 1971 after the Turkish government passed the Private University Law banning private higher education institutions.²⁹ This situation has also affected the various Syriac churches in Turkey who rely on the right to train and educate their clergy to sustain the needs of their community.

16. The right to manifest one's religion or belief includes *inter alia* the freedom to worship and the right to practice or teach one's religion or belief.³⁰ According to the Human Rights Committee, the right to freedom of worship under Article 18 of the ICCPR extends to "ritual and ceremonial acts



giving direct expression to belief [...] including the building of places of worship [...] and the observance of holidays and days of rest.”³¹ For Assyrian Christians living in Turkey, discriminatory administrative policies that hinder the construction of new churches along with the lack of safeguards allowing non-Muslims to observe religious holidays without repercussions infringe on their right to freely worship. The Committee also describes the freedom of religion or belief to include “the freedom to establish seminaries or religious schools.”³² Yet with Turkey’s Private University Law prohibiting the operation of theological seminaries, Assyrian Christians and other religious minorities remain unable to train new clergy to competently perform the duties necessary to manifest their faith.

RECOMMENDATION:

- **Remove all bureaucratic and administrative obstacles preventing non-Muslim communities from freely opening places of worship.**
- **Provide religious minorities safeguards to freely observe religious holidays without repercussion.**
- **Repeal or reform all laws banning the establishment and operation of non-Muslim theological seminaries and religious schools.**

B. Rights of Ethnic, Religious and Linguistic Minorities

17. Laws infringing on the freedom of association and instances of discrimination continue to prevent Turkey’s minorities from realizing as well as advocating for their right to “to enjoy their own culture, to profess and practice their own religion, or to use their own language,” per Turkey’s responsibilities under Article 27 of the ICCPR.³³

1. Freedom of Association

18. The 1983 Political Parties Law remains one of the biggest legal obstacles preventing minority communities from organizing to advocate for better protection of their rights. Article 81 of the law stipulates that political organizations cannot be based on class, religion, race, or language distinctions or “harm national unity by way of creating minorities in the territory of the Republic of Turkey through protecting, developing or spreading languages and cultures other than the Turkish language or culture.”³⁴ The law explicitly serves to prevent minorities from developing a political platform based on their minority status. Many political parties have been closed under this Article and the ECHR has found it in breach of the European Convention on Human Rights.³⁵ In 2011, notwithstanding such challenges, Erol Dora was elected as the first Assyrian Christian to the Turkish Parliament since the Republic’s establishment.³⁶ Dora won the election as an independent deputy candidate of the Labour, Democracy and Freedom Bloc in Mardin where after he joined Turkey’s Peace and Democracy Party.³⁷

19. Freedom of association is guaranteed by Article 22(1) of the ICCPR, which provides that “[e]veryone shall have the right to freedom of association with others [...] for the protection of his interests.” The scope of the right to freedom of association is broad, and includes the right to form political parties. As reflected by the Independent Expert on Minority Issue’s recommendations to the



Human Rights Council, “[p]olitical parties based primarily on minority or regional affiliation should not be prohibited solely for this reason. Nevertheless, narrowly drawn restrictions may be placed on the advocacy of violence to achieve political goals or on political platforms that incite hatred or discrimination.”³⁸ Article 81 of the 1983 Political Parties Law, which wholly prohibits the creation of any political organizations that promote a language or culture other than Turkish, is a violation of the freedom of association and unreasonably limits the degree to which Assyrian Christians and other minorities can advocate for their rights within Turkey’s political process.

RECOMMENDATION:

- **Repeal or reform all laws prohibiting the establishment of political parties based on minority status.**

2. *Freedom from Incitement to Discrimination*

20. The Turkish government’s interpretation of secularism requires absolute state control over all aspects of religion in the public sphere. As a result, no religious community has full legal status, and the country’s various minorities experience an asymmetrical array of rights and privileges.³⁹ Although the Treaty of Lausanne, which guarantees the right of Turkey’s non-Muslim communities, does not specify which groups are governed by the agreement, its protections have historically been applied exclusively to the country’s Armenian Orthodox, Greek Orthodox and Jewish communities.⁴⁰ As a result, only these groups were afforded the right to own educational institutions to teach their language.⁴¹ In 2013, after members of the Syriac Orthodox Church of the Virgin Mary sued to annul a decision rejecting their request to open a kindergarten, the 13th Administrative Court in Ankara held that Assyrian Christians fall within the protection afforded under the Treaty of Lausanne.⁴² For the first time in Turkey’s history, Assyrian Christians are now preparing to open their own Syriac-instructed school in Istanbul, albeit absent any public funding.

21. Although minorities now face less legal obstacles towards educating members of their community in their own language, they continue to be represented in a negative light in state-sponsored textbooks. For example, a history textbook used in tenth grade Turkish high school classes portray Assyrian Christians as traitors and presents distorted historical information.⁴³ Despite outcry from the community against the use of the textbooks, they remain part of the state’s curriculum.⁴⁴ Continued disparagement of Assyrian Christians in Turkish history textbooks reaffirms the entrenched societal discrimination against Turkey’s non-Muslim communities referenced earlier and implicates Turkey’s commitment to end incitement to such discrimination under Article 20 of the ICCPR.

RECOMMENDATION:

- **Revise all textbooks to remove statements disparaging Turkey’s non-Muslim communities.**
- **Ratify the UNESCO Convention against Discrimination in Education.**



C. Freedom from Forced Eviction

22. The Turkish Government's failure to fully resolve past expropriation of properties belonging to non-Muslim communities violates the right of Assyrian Christians to be free from forced evictions.

23. While the DRA regulates the operation of the country's 85,000 registered mosques and employs local and provincial imams,⁴⁵ the General Directorate for Foundations (GDF) regulates activities of non-Muslim religious groups and their related religious property.⁴⁶ The GDF recognizes 161 non-Muslim foundations in Turkey, of which roughly 12 belong to various Assyrian Christian denominations.⁴⁷ However, following the implementation of Article 101/4 of the Civil Law restricting the "establishment of a foundation for the members of a certain race or community," immovable properties acquired by non-Muslim foundations after 1936 were systematically seized by the state.⁴⁸

24. The Law on Foundations has recently been amended, and according to a decision of the Council of Ministers, non-Muslim foundations are now allowed to acquire and register both movable and immovable property.⁴⁹ Despite these positive developments, past expropriation of immovable properties belonging to minority foundations remains unresolved.⁵⁰ Among them include portions of the Syriac Orthodox Church's Mor Gabriel monastery in Turkey's Mardin Province. Following the Turkish Supreme Court of Appeal's 2012 decision to grant substantial parts of Mor Gabriel monastery to the Turkish Treasury, the Council of the GDF elected to return the seized property back to the Mor Gabriel Foundation as part of the Turkish government's "democratization package."⁵¹ Nevertheless, a large portion of the land, including property the monastery has owned and paid taxes on for decades, has yet to be returned.⁵² A similar unresolved problem exists in the nearby Mor Evgin Monastery. Following a cadastral survey in the 1980s, two thousand dönüm, or 2 square kilometers, belonging to the monastery was fraudulently assigned to 400 residents in the adjacent village.⁵³

25. The term "forced evictions," as understood by the Committee on Economic, Social and Cultural Rights, is defined as "the permanent or temporary removal against their will of individuals, families and/or communities from the homes and/or land which they occupy, without the provision of, and access to, appropriate forms of legal or other protection" [emphasis added].⁵⁴ The Committee recognizes forced evictions as *prima facie* illegal, placing the burden on the government to justify its lawfulness,⁵⁵ and notes the particular vulnerability of minorities who are disproportionately harmed as a result of forced eviction.⁵⁶ The application of Article 101/4 of the Civil Law discriminates against religious minorities by targeting immovable properties owned by their foundations. As such, instances of expropriation resulting in the confiscation of church property should be recognized as unlawful and amounting to the level forced eviction as described by the Committee. While amending the law has helped halt future cases of unjust expropriation, it does not discharge Turkey's obligations to ensure an effective remedy and restore illegally seized property.

RECOMMENDATION:

- Promptly restore all unlawfully expropriated property belonging to minority foundations.



IV. CONCLUSION

26. Recent history has proven Turkey to be an increasingly stable and democratic state in the region. In fact, Assyrian Christians fleeing the violence in neighboring Iraq and Syria have sought refuge within its borders. In 2011, Assyrian Christians represented 52 percent of new UNHCR-registered Iraqi refugees in Turkey.⁵⁷ With the state's bid to join the European Union serving as a catalyst for much of the ongoing reforms, minorities are hopeful that their future in Turkey will include greater respect for their human rights. Yet much is still needed from Ankara to ensure that Assyrian Christians and other minorities who have lived in Turkey for centuries are able to preserve their identity free from discrimination within the state's evolving socio-political landscape.



¹ Founded in 2007, The Assyrian Universal Alliance – Americas Chapter works to increase public awareness and understanding of the Assyrian culture and people, to promote human rights and indigenous rights, and to provide charitable services to persons of Assyrian descent.

² The Assyrian Advocacy Group (AAG) is an independent advocacy and action group that is focused on Human Rights and democracy issues in the Middle East, with special attention on Turkey. AAG aims to be part of the global struggle for human rights, works with international human rights organisations, appeals to governments and institutions in the Middle-East to respect human rights, minority rights, religious freedom, freedom of press and the rule of law, demanding reforms, accountability and justice while reporting about abuses. AAG is an independent, non-profit, non-partisan international organization with frontline activists, lawyers, and journalists from Turkey, Sweden and Germany.

³ Referred to at times as Chaldeans, Syriacs, Chaldo-Assyrians or by other variant names, Assyrian Christians maintain they are a single ethno-religious and linguistic community and should be treated as such.

⁴ *Assyria*, Unrepresented Nations and Peoples Organization, March 28, 2008, <http://www.unpo.org/members/7859> (accessed March 14, 2014).

⁵ “Who are indigenous peoples?” *Factsheet*, United Nations Permanent Forum on Indigenous Issues, http://www.un.org/esa/socdev/unpfi/documents/5session_factsheet1.pdf (accessed March 14, 2014); The Permanent Forum understands the term “indigenous” to be based on the following criteria: (1) Self-identification as indigenous peoples at the individual level and accepted by the community as their member; (2) Historical continuity with pre-colonial and/or pre-settler societies; (3) Strong link to territories and surrounding natural resources; (4) Distinct social, economic or political systems; (5) Distinct language, culture and beliefs; (6) Form non-dominant groups of society; (7) Resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities.

⁶ “Turkey Assyrians,” Minority Rights Group International, <http://www.minorityrights.org/4406/turkey/assyrians.html> (accessed June 15, 2014).

⁷ “Nestorian Patriarchs,” Nestorian.org, http://www.nestorian.org/nestorian_patriarchs.html (accessed June 15, 2014); “Patriarchs of Antioch,” *Margoneetho*, <http://sor.cua.edu/Patriarchate/PatriarchsChronList.html> (accessed June 15, 2014).

⁸ Ayca Orer, “Turkey Denies Request for Assyrian-Language Kindergarten,” *Al Monitor*, December 12, 2012, <http://www.al-monitor.com/pulse/culture/2012/12/turkey-denies-assyrian-request-to-open-kindergarten.html> (accessed June 15, 2014).

⁹ Id.

¹⁰ *People Under Threat 2013*, Minority Rights Group International, <http://www.minorityrights.org/download.php?id=1239> (accessed July 4, 2014).

¹¹ “Other Countries and Regions Monitored,” US Commission on International Religious Freedom, <http://www.uscirf.gov/all-countries/countries-of-particular-concern-tier-1> (accessed July 4, 2014)

¹² “Turkey - Freedom in the World 2013,” Freedom House International, <http://www.freedomhouse.org/report/freedom-world/2013/turkey#.U7c0rBa0Zg0>

¹³ 1982 Constitution of the Republic of Turkey, Article 24.

¹⁴ 1961 Constitution of the Republic of Turkey, Article 2; 1982 Constitution of the Republic of Turkey, Article 2.

¹⁵ Susanne Gusten, “Turkey’s Elephant in the Room: Religious Freedom,” *New York Times*, September 28, 2011, <http://www.nytimes.com/2011/09/29/world/europe/turkeys-elephant-in-the-room-religious-freedom.html?pagewanted=all&r=0>

¹⁶ General Comment 18, Par. 13, Human Rights Committee.

¹⁷ *Sinan Işık vs. Turkey*, European Court of Human Rights, February 2, 2014, Par. 60, [http://hudoc.echr.coe.int/sites/eng/pages/search.aspx?i=001-97087#{"itemid":\["001-97087"\]}](http://hudoc.echr.coe.int/sites/eng/pages/search.aspx?i=001-97087#{)

¹⁸ Id. at Par. 18.

¹⁹ *July-December, International Religious Freedom Report 2010 - Turkey*, U.S. Department of State Bureau of Democracy, Human Rights, and Labor, September 13, 2011, 5, <http://www.state.gov/documents/organization/171727.pdf>

²⁰ *Supra* note 17 at Par. 16, [http://hudoc.echr.coe.int/sites/eng/pages/search.aspx?i=001-97087#{"itemid":\["001-97087"\]}](http://hudoc.echr.coe.int/sites/eng/pages/search.aspx?i=001-97087#{)

²¹ International Convention on the Elimination of All Forms of Racial Discrimination, Article 2(1)(c).

²² *Turkey*, CIA World Factbook, Middle East, June 20, 2014, <https://www.cia.gov/library/publications/the-world-factbook/geos/tu.html>.

²³ Emma Ross-Thomas, “Modern Turkey’s first new church opens in Istanbul,” *Reuters*, September 6, 2006, <http://www.wrn.org/articles/22640/?&place=europe§ion=e-vangelicals> (accessed June 15, 2014).

²⁴ Vercihan Ziflioğlu, “Syriacs to build new church in Istanbul,” *Hurriyet Daily News*, December 11, 2012, <http://www.hurriyetdailynews.com/syriacs-to-build-new-church-in-istanbul.aspx?PageID=238&NID=36566&NewsCatID=339> (accessed June 15, 2014).

²⁵ Id.

²⁶ İstanbul’da Süryani kilisesine onay çıkmadı: Hazırlanan proje uygun bulunmadı... (“No approval for the Syriac Orthodox Church: Prepared plan was found inadequate”) Egemedhaber, January 20, 2014,



<http://www.egemedhaber.com/popup/haber-yazdir.asp?haber=801> (accessed June 15, 2014).

²⁷ "Christians in Turkey long for Christmas spirit," *Today's Zaman*, December 25, 2011, <http://www.todayszaman.com/news-266648-christians-in-turkey-long-for-christmas-spirit.html> (accessed July 11, 2014).

²⁸ Bahar Atakan, "Hafız okulu açılıyor," *Milliyet.com.tr.*, November, 13, 2011, <http://www.milliyet.com.tr/hafiz-okulu-aciliyor/gundem/detay/1791761/default.htm> (Accessed July 11, 2014).

²⁹ "PM Erdoğan asserts Turks rights in Greece in return for Halki Seminary," *Hurriyet Daily News*, January 1, 2010, <http://www.hurriyetdailynews.com/default.aspx?pageid=438&n=pm-erdogan-asserts-turks-rights-in-greece-in-return-to-halki-seminary-2010-01-04> (accessed June 15, 2014).

³⁰ *Supra* note 16 at Par. 4.

³¹ *Id.*

³² *Id.*

³³ The Turkish Government's sole reservation to the ICCPR reserves the right to interpret and apply Article 27 in accordance with the constitution and the 1923 Treaty of Lausanne.

³⁴ Michael M. Gunter, "Turkey: The Politics of a New Democratic Constitution," *Middle East Policy*, Spring 2012, Volume XIX, Number 1, <http://mepc.org/journal/middle-east-policy-archives/turkey-politics-new-democratic-constitution?print> (accessed June 15, 2014).

³⁵ *Socialist Party and others v. Turkey*, European Court of Human Rights, May 25, 1998, Par. 54.

³⁶ *Supra* note 12.

³⁷ Özgür Öğret, "Turkey's first Assyrian MP discusses candidacy, minority rights," *SES Türkiye*, January 11, 2011, http://turkey.setimes.com/en_GB/articles/ses/articles/features/departments/national/2011/11/01/feature-01 (accessed June 15, 2014).

³⁸ "United Nations Forum on Minority Issues: Compilation of Recommendations of the First Four Sessions 2008-2011," Office of the High Commissioner for Human Rights, Par. 33,

http://www.ohchr.org/Documents/HRBodies/HRCouncil/MinorityIssues/Forum_On_Minority_Pub_en_low.pdf

³⁹ *Annual Report 2013*, United State Commission on International Religious Freedom, April 2013, 270, [http://www.uscifr.gov/sites/default/files/resources/2013%20USCIRF%20Annual%20Report%20\(2\).pdf](http://www.uscifr.gov/sites/default/files/resources/2013%20USCIRF%20Annual%20Report%20(2).pdf)

⁴⁰ *Annual Report 2012*, United State Commission on International Religious Freedom, March 2012, 202, [http://www.uscifr.gov/sites/default/files/resources/2013%20USCIRF%20Annual%20Report%20\(2\).pdf](http://www.uscifr.gov/sites/default/files/resources/2013%20USCIRF%20Annual%20Report%20(2).pdf)

⁴¹ *Id.* at 208.

⁴² "Finally, Lausanne Treaty applied to non-Muslims," *Today's Zaman*, April 20, 2013, <http://video.zaman.com.tr/newsDetail.action;jsessionid=K>

[HDdV2I+deArCUpABHcHPHGD?newsId=324064&columnId=0](http://www.egemedhaber.com/popup/haber-yazdir.asp?haber=801) (accessed June 15, 2014).

⁴³ Abdulmesih BarAbraham, "Turkish High School History Book Portrays Assyrians As Traitors," Assyrian International News Agency, October 2, 2011, <http://www.aina.org/releases/20111002110757.htm> (accessed June 15, 2014).

⁴⁴ Abdulmesih BarAbraham, "Negative Portrayal of Assyrians Remains in Turkish School Textbooks," Assyrian International News Agency, October 25, 2012, www.aina.org/news/20121024190017.htm (accessed June 15, 2014).

⁴⁵ *International Religious Freedom Report 2012 - Turkey*, U.S. Department of State Bureau of Democracy, Human Rights, and Labor, May 20, 2013, 2,

<http://www.state.gov/documents/organization/208588.pdf>

⁴⁶ *Id.* at 4.

⁴⁷ *Supra* note 19 at 4.

⁴⁸ "Gov't gives go ahead for return of seized property to non-Muslim foundations," *Today's Zaman*, August 28, 2011, <http://www.todayszaman.com/news-255244-govt-gives-go-ahead-for-return-of-seized-property-to-non-muslim-foundations.html> (accessed June 15, 2014).

⁴⁹ *Id.*

⁵⁰ *Annual Report 2014*, United State Commission on International Religious Freedom, June 3, 2014, 146, <http://www.uscifr.gov/sites/default/files/Turkey%202014.pdf>

⁵¹ Damaris Kremida, "Turkey returns less than half of monastery land it seized," *World Watch Monitor*, March 13, 2014, https://www.worldwatchmonitor.org/2014/03/article_3052786.html/ (accessed June 15, 2014).

⁵² *Id.*

⁵³ "Mor Augin Süryani Ortodoks Manastırı'nın son durumu," *Hristiyan Forum*, June 24, 2013, <http://www.hristiyanforum.com/forum/showthread.php?t=336297> (accessed June 15, 2014)

⁵⁴ General Comment 7, Committee on Economic, Social and Cultural Rights, Par. 4

⁵⁵ *Id.* at Par. 1.

⁵⁶ *Id.* at Par. 11.

⁵⁷ *Mid-Year Review of the Regional Response Plan for Iraqi Refugees 2012*, United Nations Office for the Coordination of Humanitarian Affairs, September 10, 2012, 115: https://docs.unocha.org/sites/dms/CAP/MYR_2012_Iraq_RRP.pdf