

be of use to this Court. By way of further support for this motion, the organizations provide the following descriptions of themselves, their missions, their memberships, and their interests:

Armenian Bar Association

The Armenian Bar Association (“Association”) is a non-profit organization formed in 1989 to provide an arena for lawyers of Armenian heritage and other interested individuals to address the legal concerns of the Armenian community. The Association is committed to serve the profession of law, the interests of its members, and the rights of its constituents. The Association draws its members from a national group of attorneys, including members who reside in the Commonwealth of Massachusetts.

The Association’s members have a strong interest in courts’ upholding lawful governmental choices to recognize the Armenian Genocide. There is near-unanimous consensus among scholars that “[m]ore than one million Armenian men, women, and children were methodically and deliberately murdered in Ottoman Turkey.” Vahakn N. Dadrian, *Genocide as a Problem of National and International Law: The World War I Armenian Case and Its Contemporary Legal Ramifications*, 14 Yale J. Int’l L. 221, 229 (1989). Numerous scholars have recognized that the atrocities inflicted on ethnic Armenians in the Ottoman Empire during and after World War I constituted genocide.¹ The Association’s members thus have an acute

¹ See, e.g., Donald Bloxham, *The Great Game of Genocide: Imperialism, Nationalism and the Destruction of the Ottoman Armenians* (2005); Taner Akçam, *From Empire to Republic: Turkish Nationalism and the Armenian Genocide* (2004); Merrill D. Peterson, *Starving Armenians: America and the Armenian Genocide, 1915-1930 and After* (2004); Jay Winter, ed., *America and the Armenian Genocide of 1915* (2004); Yves Ternon, *The Armenians: History of a Genocide* (Rouben Cholokian, trans., 2d ed. 2004); Eric D. Weitz, *A Century of Genocide* (2003); Samantha Power, *A Problem From Hell: America and the Age of Genocide* (2002); Israel W. Charny, ed., I *The Encyclopedia of Genocide* (1999); Christopher Simpson, *The Splendid Blond Beast: Money, Law and Genocide in the Twentieth Century* (reprint ed. 1993); Donald E. Miller & Lorna Touryan Miller, *Survivors: An Oral History of the Armenian Genocide* (1993); Clive Foss, *The Turkish View of Armenian History: A Vanishing Nation*, in *The Armenian Genocide: History, Politics, Ethics* (Richard G. Hovanissian ed., 1992); Robert F. Melson,

interest in ensuring that the decision of the Commonwealth and other jurisdictions to recognize the Armenian Genocide, and to refuse to endorse the messages of those who deny that it happened, is sustained against baseless court challenges.

Armenian National Committee of America

The Armenian National Committee of America (ANCA) is the largest Armenian-American grassroots political organization. Working in coordination with a network of offices, chapters, and supporters throughout the United States, including in Massachusetts, ANCA advances the concerns of the Armenian-American community on a broad range of issues. One of its primary concerns is fighting against the denial of the Armenian Genocide. Moreover, ANCA works with a coalition of human rights activists and educators to halt or prevent ongoing and future genocides anywhere in the world through grassroots activism, advocacy, and education. Having advocated for the passage of legislation in Massachusetts to teach about genocide, including the Armenian Genocide, and having fought against denialist efforts to manipulate U.S. educational institutions around the country, ANCA has a strong interest in ensuring the implementation of Chapter 276 according to the Massachusetts legislature's intent, and in protecting against any attempt to thwart that intent.

Revolution and Genocide: On the Origins of the Armenian Genocide and the Holocaust (1992); Roger W. Smith, *The Armenian Genocide: Memory, Politics and the Future*, in *The Armenian Genocide: History, Politics, Ethics* (Richard G. Hovanissian ed., 1992); Frank Chalk & Kurt Jonassohn, *The History and Sociology of Genocide* (1990); Leo Kuper, *Genocide: Its Political Use in the Twentieth Century* (Yale Univ. Press 1982) (1981); David Marshall Lang, *The Armenians: A People In Exile* (1981).

Irish Immigration Center

The Irish Immigration Center (“IIC”) is located in Boston. Founded in 1989 to serve the needs of the Irish immigrant community in New England, the IIC’s work now includes immigrants from a broad range of countries. Chapter 276 specifically refers to the “Great Hunger Period in Ireland” as an event worthy of attention in the public schools of the Commonwealth. IIC endorses this particular goal, but is equally concerned that the collective memory of the other events covered by the legislation, including the Armenian Genocide, should not be controlled by those with an illusory denialist perspective concerning settled historical evidence.

Jewish Alliance For Law & Social Action

The Jewish Alliance for Law & Social Action (“JALSA”) is a Boston-based organization dedicated to the civil rights and liberties of all Americans. JALSA’s members actively pursue the attainment of legal and economic justice for all. As Jews, they are particularly conscious of the Holocaust and other modern governmental genocides.

National Association For The Advancement Of Colored People

The National Association for the Advancement of Colored People (“NAACP”), founded in 1909, is devoted to attaining for African Americans the full benefits of citizenship in the United States. The NAACP has a strong interest in the education of all public school children concerning the history of enslavement, the middle passage and segregation, and the long, continuing struggle to overcome their residual obstacles.

Wherefore, the Armenian Bar Association, the Armenian National Committee of America, the Irish Immigration Center, the Jewish Alliance for Law & Social Action, and the National Association for the Advancement of Colored People respectfully request that their

motion for leave to file the *amicus* brief submitted herewith in support of Defendants' Motion to Dismiss be granted.

The *amici* request an opportunity to be heard at oral argument on the motion to dismiss.

Respectfully submitted,

ARMENIAN BAR ASSOCIATION

By its attorneys,

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ARMENIAN NATIONAL COMMITTEE OF AMERICA,
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JEWISH ALLIANCE FOR LAW & SOCIAL ACTION,
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By their attorney,

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Date: March 8, 2006

Certificate of Conference Pursuant to Local Rule 7.1(A)(2)

I, Gabrielle R. Wolohojian, state that I have conferred with Harvey Silverglate and Malick Ghachem, counsel for Plaintiffs, and with David Guberman, Assistant Attorney General, counsel for Defendants, and that they have assented to the granting of this motion.

/s/ Gabrielle R. Wolohojian
Gabrielle R. Wolohojian

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served upon the following persons on the 8th day of March 2006 through the Court's electronic filing system.

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