



June 6, 2016

**VIA OVERNIGHT DELIVERY SERVICE**

The Honorable Samantha Power  
Permanent Representative of the United States  
of America to the United Nations

*RE: Urging United Nations Recognition of Islamic State Genocide Against Christians  
and Other Religious Minorities*

Dear Ambassador Power:

By way of introduction, the American Center for Law and Justice (ACLJ) is an organization dedicated to the defense of religious freedom at home and abroad. ACLJ attorneys have argued before the Supreme Court of the United States in a number of significant cases involving the freedoms of speech and religion.<sup>1</sup> Our affiliate, the European Centre for Law and Justice (ECLJ), is an international not-for-profit law firm located in Strasbourg, France, dedicated to protecting human rights and religious freedom in Europe and around the world. The ECLJ holds Special Consultative Status as an NGO before the United Nations. The ECLJ has submitted both written and oral statements to the United Nations Human Rights Council on the subject of genocide perpetrated by the Islamic State (commonly referred to as ISIS, ISIL, and Daesh). The ACLJ submits this correspondence on behalf of its members and over 350,000 individuals, including individuals residing in 160 nations and territories.

The purpose of this correspondence is twofold. First, we wish express our sincere appreciation for your public stance against genocide and your consistent calls for action by the United States government to honor our international obligation to "prevent and punish" genocide.

<sup>1</sup>See, e.g., *Pleasant Grove City v. Summum*, 555 U.S. 460 (2009) (unanimously holding that a monument erected and maintained by the government on its own property constitutes government speech and does not create a right for private individuals to demand that the government erect other monuments); *McConnell v. FEC*, 540 U.S. 93 (2003) (unanimously holding that minors enjoy the protection of the First Amendment); *Lamb's Chapel v. Ctr. Moriches Sch. Dist.*, 508 U.S. 384 (1993) (holding that denying a church access to public school premises to show a film series on parenting violated the First Amendment); *Bd. of Educ. v. Mergens*, 496 U.S. 226 (1990) (holding by an 8-1 vote that allowing a student Bible club to meet on a public school's campus did not violate the Establishment Clause); *Bd. of Airport Comm'rs v. Jews for Jesus*, 482 U.S. 569 (1987) (unanimously striking down a public airport's ban on First Amendment activities).

Second, recognizing your commitment to confronting the evil of genocide, we respectfully urge you to continue and intensify your diplomatic pursuit of any and all available means to mobilize the international community to stop the ongoing genocide against Christians, Yazidis, and other religious and ethnic minorities and protect the victims. Specifically, we write to you in advance of the upcoming 32nd Session of the United Nations Human Rights Council with the hope that you will press for a declaration recognizing the Islamic State genocide at that Session.

## **I. THE UNITED STATES HAS “A DUTY TO ACT.”**

As you have recognized, the United States “has a duty to act” against genocide — an obligation based on morality and in our national security interests:

The United States should stop genocide for two reasons. The first and most compelling reason is moral. When innocent life is being taken on such a scale and the United States has the power to stop the killing at reasonable risk, it has a duty to act. . . . [T]he second reason: enlightened self-interest . . . . [A]llowing genocide undermined regional and international stability, created militarized refugees, and signaled dictators that hate and murder were permissible forms of statecraft. . . . [S]ecurity for Americans at home and abroad is contingent on international stability, and there is perhaps no greater source of havoc than a group of well-armed extremists bent on wiping out a people on ethnic, national, or religious grounds.<sup>2</sup>

While noting some advances in the United States’ approach to genocide, you warned that such “advances have been eclipsed by America’s toleration of unspeakable atrocities, often committed in clear view.”<sup>3</sup> And sadly, you were correct in your assessment of the catastrophic consequences of United States’ apathy and inaction.

You identified two common yet false responses for why “the United States stand so idly by.”<sup>4</sup> The first is a claimed lack of knowledge. But, just as you described, the United States cannot truthfully say: “We didn’t know.”<sup>5</sup> We do know. The second is the notion that any effort would be futile. But, you provided examples showing this notion to be false. “[S]mall or belated steps” by American leaders and diplomats “saved hundreds of thousands of lives. If the United States had made genocide prevention a priority, it could have saved countless more.”<sup>6</sup> As you recognized, the real reason for American inaction against genocide is “a lack of will.”<sup>7</sup>

Certainly, lack of knowledge is no longer a valid excuse. Earlier this year, Secretary of State John Kerry publically proclaimed:

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<sup>2</sup>SAMANTHA POWER, “A PROBLEM FROM HELL”: AMERICA AND THE AGE OF GENOCIDE 512-13 (2013).

<sup>3</sup>*Id.* at 503.

<sup>4</sup>*Id.* at 504.

<sup>5</sup>*Id.*

<sup>6</sup>*Id.* at 507.

<sup>7</sup>*Id.* at 508.

Daesh is responsible for genocide against groups in areas under its control, including Yazidis, Christians, and Shia Muslims. Daesh is genocidal by self-proclamation, by ideology, and by actions – in what it says, what it believes, and what it does. Daesh is also responsible for crimes against humanity and ethnic cleansing directed at these same groups and in some cases also against Sunni Muslims, Kurds, and other minorities.<sup>8</sup>

Further,

[w]e know that in Mosul, Qaraqosh, and elsewhere, Daesh has executed Christians solely because of their faith; that it executed 49 Coptic and Ethiopian Christians in Libya; and that it has also forced Christian women and girls into sexual slavery. . . .

We know that in areas under its control, Daesh has made a systematic effort to destroy the cultural heritage of ancient communities – destroying Armenian, Syrian Orthodox, and Roman Catholic churches; blowing up monasteries and the tombs of prophets; desecrating cemeteries; and in Palmyra, even beheading the 83-year-old scholar who had spent a lifetime preserving antiquities there.

We know that Daesh's actions are animated by an extreme and intolerant ideology that castigates Yazidis as, quote, "pagans" and "devil-worshippers," and we know that Daesh has threatened Christians by saying that it will, quote, "conquer your Rome, break your crosses, and enslave your women."<sup>9</sup>

Secretary Kerry reiterated his assessment in remarks he made at Rice University:

In the time since, Daesh has continued to target religious minorities. They continue to kill Yazidis because they are Yazidis, Christians because they are Christians, Shia because they are Shia. In my judgment – and I registered this last month – Daesh is responsible for committing genocide against these groups in areas under its control.<sup>10</sup>

Ambassador David Saperstein, Ambassador-at-Large for International Religious Freedom, welcomed Secretary Kerry's formal recognition of genocide, saying, "The genocide treaty was created as a way for the world to say there are certain crimes that are so abhorrent to the conscience of humanity that they must be called for what they are."<sup>11</sup> "This is a historical designation that hopefully will galvanize the conscience of the world."<sup>12</sup>

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<sup>8</sup>John Kerry, *Remarks on Daesh and Genocide*, U.S. DEP'T OF STATE (Mar. 17, 2016) <http://www.state.gov/secretary/remarks/2016/03/254782.htm>.

<sup>9</sup>*Id.*

<sup>10</sup>John Kerry, *Remarks at Rice University's Baker Institute for Public Safety*, U.S. DEP'T OF STATE (Apr. 26, 2016), <http://www.state.gov/secretary/remarks/2016/04/256618.htm>.

<sup>11</sup>Michael Isikoff, *ISIS Committing 'Genocide' Against Minorities, U.S. Declares*, YAHOO NEWS (Mar. 17, 2016), <https://www.yahoo.com/news/isis-committing-genocide-against-christians-144946484.html>.

<sup>12</sup>*Id.*

You recently acknowledged the ongoing atrocities when you addressed the

creativity in the savagery that has been introduced to the Syrian theater. Illegal detentions, often involving torture, rape, murder; chemical weapon attacks against civilians; bombs landing on schools, hospitals, and civilian neighborhoods; sieges of entire cities; starving people to death willfully when you have the power with a pen – a pen stroke – to allow food to people you know are going to die if they don't get food, and you just simply don't sign the form. The Assad regime is the leading perpetrator of these crimes by a long shot, but ISIL and other armed groups, of course, are responsible for their share of atrocities.<sup>13</sup>

The United States House of Representatives has also spoken on the issue, *unanimously* passing a resolution recognizing the genocide:

Whereas Christians and other ethnic and religious minorities have been murdered, subjugated, forced to emigrate and suffered grievous bodily and psychological harm, including sexual enslavement and abuse, inflicted in a deliberate and calculated manner in violation of the laws and treaties forbidding crimes against humanity, and the United Nations Convention on the Prevention and Punishment of the Crime of Genocide . . . the atrocities committed against Christians and other ethnic and religious minorities targeted specifically for religious reasons, are, and are hereby declared to be, “crimes against humanity”, and “genocide”.<sup>14</sup>

In its 2016 Annual Report, the United States Commission on International Religious Freedom (USCIRF) repeated its earlier conclusion that the Islamic State was committing genocide against minority religious and ethnic communities in Iraq and Syria.<sup>15</sup> USCIRF's Report detailed the evidence supporting this conclusion.

There can be no doubt that the United States has *knowledge* of the ongoing genocide. The Department of State, the Congress, and the USCIRF have expressly professed such knowledge. The United States government has spoken. The more than 350,000 people who have signed the ACLJ's genocide petition have spoken. Madam Ambassador, we believe it is time for you, as the head of the Permanent Mission of the United States to the United Nations, to speak out again. The “duty to act” is clear.<sup>16</sup> You have the influence to make action meaningful. *We strongly and respectfully urge you to use your position of influence at the United Nations to intervene at the upcoming 32nd Session of the Human Rights Council and press the Council to recognize the Islamic State genocide against Christians and other religious and ethnic minorities as such at this Session.*<sup>17</sup>

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<sup>13</sup>Ambassador Samantha Power, *Remarks at an Informal Meeting on “Syria: War Crimes and the Pursuit of Justice”*, U.S. MISSION TO THE U.N. (Apr. 14, 2016), <http://usun.state.gov/remarks/7226>.

<sup>14</sup>H.R. Con. Res. 75, 114<sup>th</sup> Cong. (1st Sess. 2015).

<sup>15</sup>2016 ANNUAL REPORT USCIRF, 99, 121-22 (Apr. 2016), <http://www.uscifr.gov/sites/default/files/USCIRF%202016%20Annual%20Report.pdf>.

<sup>16</sup>POWER, *supra* note 2, at 503.

<sup>17</sup>We know that the High Commissioner for Human Rights is familiar with the ongoing crisis. In September 2015, during his opening statement at the 30th session, the High Commissioner declared that, “despite the horrific human rights violations in Syria that have been investigated, enumerated, [and] discussed, we must continue to deplore the

While we call for swift and decisive action by the international community to stop the genocide and protect the victims, we also recognize that the first step is for the United Nations to formally *recognize* that the atrocities constitute genocide as such. Intervention by your office at the United Nations Human Rights Council, the Security Council, and the General Assembly (and other appropriate organs of the United Nations) would carry significant weight. You are the voice of the United States to the international community.

We also urge you to communicate with the Special Adviser on the Prevention of Genocide, H.E. Adama Dieng, whose role is to serve “as a catalyst to raise awareness of the causes and dynamics of genocide, to alert relevant actors where there is a risk of genocide, and to advocate and mobilize for appropriate action.”<sup>18</sup> Thus, the Special Adviser’s office would be a particularly influential and appropriate ally to advance this cause in the international community.

*It is absolutely critical that the United Nations declare that the Islamic State and its followers are committing acts of genocide against Christians and other religious and ethnic minorities and to then act accordingly. You possess the requisite knowledge and a position of significant influence. You have recognized the duty to act and have demonstrated the will to do so. We respectfully urge you to do so again by zealously advancing this cause at the United Nations.*

## **II. THE UNITED STATES MUST URGE THE UNITED NATIONS TO *RECOGNIZE* THE GENOCIDE AGAINST CHRISTIANS AND OTHER RELIGIOUS AND ETHNIC MINORITIES.**

The first step the United Nations must take in order to fulfill its responsibility to protect is to recognize the ongoing atrocities as genocide. We strongly and respectfully urge you to communicate the importance of such a declaration with the appropriate United Nations organs.

As recognized in the Convention,

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 to another group.<sup>19</sup>

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international community’s failure to act.” Opening Statement by UN High Commissioner for Human Rights Zeid Ra’ad Al Hussein at the 30th Session of the Human Rights Council, OHCHR.ORG, <http://www.ohchr.org/RU/NewsEvents/Pages/DisplayNews.aspx?NewsID=16414&> (last visited June 3, 2016). At that time, the High Commissioner did not specifically ask for recognition of the Islamic State’s acts as acts of genocide. The time to do so is now.

<sup>18</sup> *Mission Statement*, UN.ORG, <http://www.un.org/en/preventgenocide/adviser/> (last visited June 3, 2016).

<sup>19</sup> Convention on the Prevention and Punishment of the Crime of Genocide, art. II, Dec. 9, 1948, 78 U.N.T.S. 277 [hereinafter Genocide Convention]. We recognize that the United States has reserved its own definition of genocide

Article III of the Convention identifies the following as punishable acts: “(a) Genocide; (b) Conspiracy to commit genocide; (c) Direct and public incitement to commit genocide; (d) Attempt to commit genocide; (e) Complicity in genocide.”<sup>20</sup> Article IV makes clear that “Persons committing genocide or any of the other acts enumerated in article III shall be punished, whether they are constitutionally responsible rulers, public officials or private individuals.”<sup>21</sup> Such provisions mean little if the United Nations fails to recognize particular acts as acts of genocide. The United Nations can no longer turn a blind eye to the growing body of evidence, which demonstrates that the inhuman violence at issue is, in fact, genocide as defined by the Convention.

The facts supporting a United Nations genocide declaration are well known, well documented, and will not be repeated in detail here. We outlined certain facts in prior correspondence to Secretary Kerry, which was copied to your office. To briefly summarize, in the summer of 2014, Islamic State leader, Abu Bakr Al-Baghdadi, self-proclaimed to be Caliph Ibrahim, declared the creation of an Islamic caliphate under his leadership. Since then, the Islamic State has systematically killed Christians, Yazidis, and other non-Muslim as well as Muslim minorities who do not adhere to the Islamic State’s ideology. *Islamic State members have killed Christians and Yazidis by the thousands, have enslaved and raped thousands more because of their religion, and have destroyed their places of worship, their homes, and their livelihoods.*<sup>22</sup>

The Christian population in both Iraq and Syria has been decimated. In fact, hundreds of thousands of Christians have fled Iraq and Syria since the rise of ISIS.<sup>23</sup> ISIS’ religion-targeted abuses in Iraq include beheadings, burning alive in caskets, and other barbaric “killings, rape, kidnapping, enslavement, theft . . . destruction of religious sites . . . sexual slavery, forced conversion, ransom demands, property seizures, and forced business closures.”<sup>24</sup> In Syria, the Islamic State has beheaded and stoned men, women, and children for blasphemy, heresy, and apostasy.<sup>25</sup> ISIS has also demanded that religious minorities pay a tax (called jizya), or flee — punishing by death those who fail to comply.<sup>26</sup> The Islamic State’s notorious abuses are targeted primarily against religious minorities, including an estimated 200,000 Iraqi Christians in 2014.<sup>27</sup>

The growing body of evidence demonstrates that the inhuman violence at issue is, in fact, genocide as defined by the Convention. The joint Report of the Knights of Columbus and In Defense of Christians, based on the superior and thorough fact-finding of Shlomo Organization for Documentation, contains numerous first-hand accounts of genocide survivors and relatives of

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for purposes of the Convention. See 18 U.S.C. § 1091(a) (2012). However, for purposes of this correspondence, the distinction is immaterial, as both the Convention and the United States’ definitions have been satisfied.

<sup>20</sup>Genocide Convention, *supra* note 19, at art. III.

<sup>21</sup>*Id.* at art. IV.

<sup>22</sup>GENOCIDE AGAINST CHRISTIANS IN THE MIDDLE EAST, KNIGHTS OF COLUMBUS AND IN DEFENSE OF CHRISTIANS (Mar. 9, 2016), <http://indefenseofchristians.org/wp-content/uploads/2016/03/Genocide-report.pdf>.

<sup>23</sup>*Id.*; see also BUREAU OF DEMOCRACY, H.R. AND LAB., U.S. DEP’T OF STATE, SYRIA 2014 INTERNATIONAL RELIGIOUS FREEDOM REPORT 1–2 (2014) [hereinafter Syria Report].

<sup>24</sup>BUREAU OF DEMOCRACY, H.R. AND LAB., U.S. DEP’T OF STATE, IRAQ 2014 INTERNATIONAL RELIGIOUS FREEDOM REPORT 1–2 (2014) [hereinafter Iraq Report].

<sup>25</sup>Syria Report, *supra* note 23, at 1.

<sup>26</sup>*Id.*

<sup>27</sup>Iraq Report, *supra* note 24, at 4.

deceased or missing victims.<sup>28</sup> Again, the evidence is well-documented, and it is sickening. Virtually every day brings new reports and accounts of the Islamic State's barbarism.

We urge you to convey the evidence to the United Nations, specifically, the thorough and authoritative Knights of Columbus/In Defense of Christians report, and to remind the United Nations that such reports are consistent with its own fact-finding.<sup>29</sup> According to the United Nations High Commissioner's own report:

The violence suffered by civilians in Iraq remains staggering. The so-called 'Islamic State of Iraq and the Levant' (ISIL) continues to commit systematic and widespread violence and abuses of international human rights law and humanitarian law. These acts may, in some instances, amount to war crimes, crimes against humanity, *and possibly genocide*.<sup>30</sup>

Since the issuance of that report, however, any question as to the genocidal nature of the atrocities committed against Christians and other religious and ethnic minorities in the region has been answered in the affirmative.

The United Nations must recognize that making such a determination will place it in good company, and we urge you to remind the United Nations that the United States is not alone in recognizing the genocide and calling for action. In declaring these acts to be genocide, the United Nations will join the Parliamentary Assembly of the Council of Europe, the European Parliament, the Holy See's representative at the United Nations in Geneva as well as Pope Francis, the British House of Commons, the United States Department of State, the United States House of Representatives, the United States Commission on International Religious Freedom, and numerous NGOs — all of which have condemned the Islamic State's acts and recognized such acts as genocide.

As found by the Parliamentary Assembly of the Council of Europe, there are countless

individuals who act in the name of the terrorist entity which calls itself "Islamic State" (Daesh) and who have perpetrated acts of genocide and other serious crimes punishable under international law. States should act on the presumption that Daesh commits genocide and should be aware that this entails action under the 1948 United Nations Convention on the Prevention and Punishment of the Crime of Genocide.<sup>31</sup>

The European Parliament went even further, specifically recognizing the genocide of *Christians and other religious and ethnic minorities*. In a nearly unanimous resolution, it declared:

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<sup>28</sup>KNIGHTS OF COLUMBUS AND IN DEFENSE OF CHRISTIANS, *supra* note 22.

<sup>29</sup>See, e.g., High Commissioner for Human Rights, *Report on the Protection of Civilians in the Armed Conflict in Iraq: 1 May – 31 October 2015*, (Jan. 5, 2016), available at [http://www.uniraq.org/images/humanrights/UNAMI-OHCHR\\_%20POC%20Report\\_FINAL\\_01%20May-31%20October%202015\\_FINAL\\_11Jan2016.pdf](http://www.uniraq.org/images/humanrights/UNAMI-OHCHR_%20POC%20Report_FINAL_01%20May-31%20October%202015_FINAL_11Jan2016.pdf).

<sup>30</sup>*Id.* (emphasis added).

<sup>31</sup>EUR. CONSULT. ASS., *Foreign Fighters in Syria and Iraq*, 6th sitting, Res. 2091 (2016), <http://assembly.coe.int/nw/xml/XRef/Xref-XML2HTML-EN.asp?fileid=22482&lang=en>.

[W]hereas religious and ethnic minorities, such as Christian (Chaldean/Syriac/Assyrian, Melkite and Armenian), Yazidi, Turkmens, Shabak, Kaka'i, Sabae-Mandean, Kurdish and Shi'a communities, as well as many Arabs and Sunni Muslims, have been targeted by the so-called 'ISIS/Daesh': whereas many have been killed, slaughtered, beaten, subjected to extortion, abducted and tortured; whereas they have been enslaved (in particular women and girls, who have also been subjected to other forms of sexual violence) and forcibly converted, and have been victims of forced marriage and trafficking in human beings; whereas children have also been forcibly recruited; whereas mosques, monuments, shrines, churches and other places of worship, tombs and cemeteries have been vandalized.<sup>32</sup>

The resolution details several specific incidents in which the Islamic State committed numerous international crimes against Christians and other religious minorities in the Middle East, including the kidnapping of more than 220 Assyrian Christians in February 2015.

Importantly, the European Parliament

stresses that the so-called 'ISIS/Daesh' is committing genocide against Christians and Yazidis, and other religious and ethnic minorities, who do not agree with the so-called 'ISIS/Daesh' interpretation of Islam, and that this therefore entails action under the 1948 United Nations Convention on the Prevention and Punishment of the Crime of Genocide.<sup>33</sup>

By way of its resolution, the European Parliament "urges the members of the UN Security Council to support a referral to the International Criminal Court" and invites the Security Council to take measures for these acts "to be recognized as genocide" by the International Criminal Court.<sup>34</sup>

Finally, the European Parliament stresses the responsibility on the international community to take collective action in order to "provid[e] protection and aid, including military protection and aid, in accordance with international law, to all those targeted by the so-called 'ISIS/Daesh' and other terrorist organizations in the Middle East."<sup>35</sup> The European Parliament submitted the resolution to United Nations bodies, to the Organization of Islamic Cooperation, and to the Cooperation Council for the Arab States of the Gulf.

And, most recently, the British House of Commons unanimously passed a motion condemning the Islamic State atrocities as genocide and calling for specific action by the United Nations:

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<sup>32</sup>EUR. PARL. RES., Joint Motion for a Resolution, 2016/2529(RSP) (Feb. 2, 2016), <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+MOTION+P8-RC-2016-0149+0+DOC+XML+V0//EN>.

<sup>33</sup>*Id.*

<sup>34</sup>*Id.*

<sup>35</sup>*Id.*



That this House believes that Christians, Yazidis, and other ethnic and religious minorities in Iraq and Syria are suffering Genocide at the hands of Daesh; and calls on the Government to make an immediate Referral to the UN Security Council with a view to conferring jurisdiction upon the International Criminal Court so that perpetrators can be brought to justice.<sup>36</sup>

In sum, a growing number of international bodies have recognized that the ongoing atrocities committed by members of the Islamic State constitute genocide against Christians and other religious and ethnic minorities. On this point, there can now be no meaningful dispute. *Madam Ambassador, it is time for the United Nations not just to join, but also to lead the international community in confronting the ongoing genocide. To do so, however, it must first formally recognize the genocide. You are the voice of the United States in this regard, and that is the cause we urge you to advance.*

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We agree with and embrace your recognition of genocide as evil and your statement that the United States and the international community must act to stop it. We agree with your assessment that “America’s leadership will be indispensable in encouraging U.S. allies and regional and international institutions to step up their commitments and capacities. Given the immensity of the harm caused by genocide, its prevention is a burden that must be shared.”<sup>37</sup>

Madam Ambassador, the United States *and* the United Nations must take a strong and courageous stand against the evils of the ongoing genocide and use all available options to stop the genocide and protect the victims — by implementing appropriate penal tribunals, coordinating a more effective use of coalition military force, administering a more efficient delivery of aid, and providing meaningful in-region protection for victims such as the establishment of safe-zones. The Charter of the United Nations demands no less, and through the organs of the United Nations, empowered by the terms of the Genocide Convention, the United Nations has the unique capability to take measures to end the genocide and protect the Christians and other religious and ethnic minorities victimized thereby. *The United States, through your sphere of influence, has the capability to press the United Nations to do so. This is at least one concrete way that you can fulfill the duty to act.*

We, therefore, respectfully urge you to advance this cause at the United Nations by (1) intervening at the Human Rights Council’s 32nd Session and insisting that the Council declare that the ongoing atrocities committed by the Islamic State and associated groups constitute genocide; (2) pressing the United Nations General Assembly, Security Council and other organs and offices of the United Nations to recognize the genocide; and (3) doing everything in your power to mobilize the international community to take swift and decisive action. Speak for the United States government. Speak for the hundreds of thousands of Americans who demand

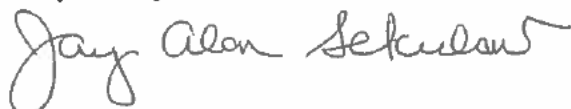
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<sup>36</sup>*Debate on a Motion on Recognition of Genocide by Daesh*, PARLIAMENT.UK, <http://www.parliament.uk/business/committees/committees-a-z/commons-select/backbench-business-committee/news-parliament-2015/chamber-debate-on-recognition-of-genocide-daesh/> (last visited June 3, 2016).

<sup>37</sup>POWER, *supra* note 2, at 513-14.

action. But, most importantly, speak for the victims. We stand with you in the cause of human dignity you work so diligently to advance, and we thank you for your leadership.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jay Alan Sekulow".

Jay Alan Sekulow  
Chief Counsel

A handwritten signature in cursive script that reads "Robert W. Ash".

Robert W. Ash  
Senior Counsel

cc: Ambassador Keith M. Harper, Representative of the United States  
to the United Nations Human Rights Council