

COLLABORATION FOR DEMOCRACY CENTRE

Armenia

THE CONSTITUTION AND LAWS OF THE REPUBLIC OF ARMENIA: A COMPARATIVE ANALYSIS OF
THE PROVISIONS ON RELIGIOUS FREEDOMS

With the recent proliferation of religious organizations in Armenia (as of the end of 2006, there were approximately sixty registered religious organizations in Armenia),¹ the Armenian government has had the opportunity to construct a religious and social framework to protect and regulate such organizations. Because of the restrictions on religion during the Soviet era, many religious organizations are either new to Armenia or have resumed their operation with the independence of Armenia (and the subsequent loosening of restrictions on religious conduct). There is little independently collected statistical data describing the demographics or belief systems of these various religious organizations; all of these religions, however, operate under the framework of the Constitution, which is the “supreme legal force and the norms thereof shall apply directly.”²

The Constitution was most recently amended in 2005 and contains several major provisions which affect freedom of religion: “freedom of thought, conscience and religion”;³ equality;⁴ and non-discrimination.⁵ The Constitution also contains a recent amendment dictating that “[t]he church shall be separate from the State in the Republic of Armenia.”⁶ The same provision also contains a newly introduced passage⁷ that confirms the “exclusive historical mission of the Armenian Apostolic Holy Church as a national church, in the spiritual life, development of the national culture and preservation of the national identity of the people of Armenia.”⁸ This Article makes two important clarifications in analyzing discrepancies between Armenian domestic laws and the Constitution. First, it asserts that activities of all religious organizations are subject to regulation by law. Second, relations between the state and the Armenian Church are also subject to regulation by law—but by a separate law.

1. When the Department of State’s 2006 report was completed, there were fifty-six registered religious organizations in Armenia. *See* RELIGIOUS FREEDOM REPORT 2006, *supra* note 2.

2. CONSTITUTION OF THE REPUBLIC OF ARMENIA art. 6, available at <http://www.parliament.am/parliament.php?id=constitution&lang=eng> [hereinafter ARMENIAN CONSTITUTION].

3. *Id.* at art. 26.

4. *Id.* at art. 14.1.

5. *Id.* (prohibiting discrimination “based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or other personal or social circumstances”).

6. *Id.* at art 8.1.

7. The Armenian constitutional reforms were a lengthy process and very controversial until recently. The first constitution, adopted on July 5, 1995, created an array of issues which were supposed to be resolved in the amendments to be officially adopted on November 27, 2005. The major problem with the constitution was the absence of proper separation of powers. The process to introduce major changes dates back to the year 2000 with the subsequent failure to endorse them in the referendum on May 28, 2003. Liz Fuller, *Armenia: Both Sides Gear up for Constitutional Referendum*, EURASIANET, Nov. 22, 2005, <http://www.eurasianet.org/departments/insight/articles/pp112205.shtml>. The amendments, adopted by referendum in November, 2005, and widely criticized as having been achieved by fraudulent voting tactics, did not seem to redress those issues properly. In fact, they created new controversies, not the least of which is the issue surrounding state neutrality and the freedom of religion. For more on the election and its role in fulfilling Armenia’s international obligations, see *Process of Fulfillment of Obligations Assumed by Armenia vis-à-vis the Council of Europe*, in DITORD, HELSINKI COMMITTEE OF ARMENIA (Amaras Printing House, Yerevan Republic of Armenia, 2005).

8. CONSTITUTION OF THE REPUBLIC OF ARMENIA art. 8.1; *see also* LIBARIDIAN, *supra* note 6, at 219 (recognizing the special role of the Apostolic Church in the Armenian Constitution).

Both the aforementioned Articles of the Constitution and the Law on the Freedom of Conscience and on Religious Organizations (“Law on the Freedom of Conscience”),⁹ adopted in June 1991 and amended twice,¹⁰ have important roles in regulating the life of religious communities and groups. However, it is essential to remember that the Law on the Freedom of Conscience was created and adopted when the country had not yet formally announced its independence¹¹ and that the Constitution was adopted later in 1995.¹² But even at its adoption, the Constitution was not in exact harmony with the Law on the Freedom of Conscience. This Article will analyze religious protection afforded to persons and groups in Armenia by looking at both the Armenian Constitution and the Law on the Freedom of Conscience. While both of these documents provide for religious protection, these instruments differ in their methodologies and contain a number of discrepancies. The resolution of these discrepancies will be instrumental in defining and protecting the legal rights of religious organizations and individuals in Armenia.

When analyzing articles of the Constitution, such as Article 8.1, an understanding of the actual implementation of the articles of the Constitution is crucial, especially in relation to the equality guarantees. There are also questions regarding the Law on the Freedom of Conscience, as it contains some conflicts with the Constitution and with international standards.¹³ Article 14.1 of the Constitution states that “[e]veryone shall be equal before the law.”¹⁴ This article goes further, forbidding any discrimination on any ground, including religion and “personal or social circumstances.”¹⁵ Another important article of the Constitution protects the essential freedom of expression, confirming that: “[e]veryone shall have the right to freedom of expression including freedom to search for, receive and impart information and ideas by any means of information regardless of the state frontiers.”¹⁶

Thus, the Constitution, as it currently stands, may be at odds with Section 8 of the Law on the Freedom of Conscience, which forbids proselytism—restricting the freedom to disseminate information.¹⁷ To complicate matters, Section 8 contains no definite understanding of the term “proselytism” or an explanation as to why it should be forbidden. Section 17 of the Law on the Freedom of Conscience aggravates the contradiction by stating that “[t]he State shall not obstruct the efforts of the Armenian Church in pursuing the following activities” that were “expressly reserved” to be exclusive to the Armenian Church:¹⁸

- To preach and disseminate her faith freely throughout the Republic of Armenia;
- To contribute to the spiritual edification of the Armenian people and to carry out the same in the state educational institutions within the law;
- To take practical measures which enhance the moral standards of the Armenian people;
- To expand benevolent and charitable activities,

9. The Law of the Republic of Armenia on the Freedom of Conscience and on Religious Organizations, June 17, 1991 [hereinafter “Law on the Freedom of Conscience”], available at <http://www.parliament.am/legislation.php?sel=show&ID=2041&lang=eng>. For an in-depth analysis of the history and effects of a similar law in Russia, see Arina Lekhel, Note, *Leveling the Playing Field for Religious “Liberty” in Russia: A Critical Analysis of the 1997 Law “On Freedom of Conscience and Religious Associations,”* 32 VAND. J. TRANSNAT’L L. 167 (1999).

10. The Law on the Freedom of Conscience, *supra* note 24, was amended in 1997 and 2001. See RELIGIOUS FREEDOM REPORT 2006, *supra* note 2 (“The 1991 Law on Freedom of Conscience, amended in 1997 and again in 2001, establishes the separation of church and state but grants the Armenian Apostolic Church official status as the national church.”).

11. Armenia formally gained its independence on September 21, 1991 (although some sources claim September 23, 1991). Armenian Television, Encyclopedia of the First Fifty Years: Formation of Independent State System, <http://www.armtv.com/first/eng/?sub=history&sec=today&par=40> (last visited March 29, 2007) (“Armenia was announced a free, independent and self-governing Republic on September 21, 1991.”). While a Declaration of Independence was signed on August 23, 1990, the country was still under Soviet control at the time, and formal independence was not realized for more than a year. See Declaration of Independence, available at <http://www.armeniaforeignministry.com/htms/doi.html>; see also Evangelos Vassilakakis & Panayiotis Yiannopoulos, *Recognition and Enforcement of Foreign Judgments in Cases of State Succession: The Paradigm of the 1981 Convention Between Greece and the Former USSR on Judicial Assistance in Civil and Criminal Matters*, 12 CURRENTS: INT’L TRADE L.J. 31, 35 n.19 (2003) (noting that the disintegration of the Soviet Federal Government took place in part due to the declarations of independence of the various former Soviet republics, including Armenia’s independence on September 23, 1991).

12. LIBARIDIAN, *supra* note 6, at 218–21 (discussing Armenian constitutional development from 1992 to 1995).

13. See *infra* Section III for a discussion regarding conflicts between Armenian law and international norms.

14. CONSTITUTION OF THE REPUBLIC OF ARMENIA art. 14.1.

15. *Id.*

16. *Id.* at art. 27.

17. Law on the Freedom of Conscience, *supra* note 9, § 8.

18. *Id.* at § 17 (noting that these privileges are granted “solely” to the Armenian Church).

- To have permanent representatives at retirement and disabled Homes, hospitals, army and penitentiary institutions.¹⁹

Thus, under a general understanding of proselytizing, Armenian law forbids this activity for all religious organizations except the Armenian Church.

There are cases that illustrate conflicts between the Constitutional protection of freedom of religion and the application of Law on the Freedom of Conscience. In one of the most recent cases, a non-governmental charitable organization, together with two other non-governmental organizations (NGOs), whose members apparently belonged to an Evangelical Church, attempted to organize a public charitable festival.²⁰ During the event, they exercised their right to teach and worship in community with others. Moreover, while the gathering may have violated Section 8 of the Law on the Freedom of Conscience, it was not permitted to take place for entirely different reasons; in fact, the denying agency referenced a different law to justify the decision.²¹ The agency denying the gathering was not, however, in compliance with Articles 26 and 27 of the Constitution. This was especially true in regards to Article 26, which delineated the right to preach and to teach religion in the community: “[e]veryone shall have the right to freedom of thought, conscience and religion. This right includes freedom to change the religion or belief and freedom to, either alone or in community with others manifest the religion or belief, through preaching, church ceremonies and other religious rites.”²² Under any possible reading of Article 26, it ensures the right to teach and disseminate religious beliefs, a right which the Law on the Freedom of Conscience fails to adequately protect.

Furthermore, other important drawbacks of the Law on the Freedom of Conscience stand out. Apart from the issues of equality and non-discrimination, the right granted to the Armenian Apostolic Church under section 17 of the Law on the Freedom of Conscience, which gives the Church the exclusive privilege in enhancing “moral standards of the Armenian people” and expanding “benevolent and charitable activities,” is also questionable.²³ The latter provision of Section 17 is even more unclear when viewed in conjunction with Section 7 of the same law, as Section 7 clearly provides the right of religious organizations “[t]o get involved in charity.”²⁴ In practice, however, it remains unclear if the privilege of participating in charitable activity is restricted to the Armenian Church; though the text of the Law does not on its face restrict this right to the Armenian Church alone, the Church appears to assert this right as exclusive nonetheless. The Church’s interpretation is likely based on the most questionable part of Section 17, which provides that the Armenian Apostolic Church has the exclusive and sole privilege “to contribute to the spiritual edification of the Armenian people and to carry out the same in the state educational institutions within the law.”²⁵ Nevertheless, while the practice of restricting the charitable activities of various religious organizations is rather controversial in law, it is rarely restricted in practice.

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Additionally, Section 17 may provide the Armenian Apostolic Church the exclusive right “[t]o have permanent representatives at retirement centers, disabled homes, hospitals, army and penitentiary institutions.”²⁷ That wording of Section 17 also appears to allow the church to teach religion in state-sponsored education and severely restricts the rights of individuals belonging to other confessions to exercise their freedom of religion or belief.²⁸ Nevertheless, such definitions of the law, as quoted above,

19. *Id.* Though the online version of the constitution in English does not contain the last clause, it is in fact in force—the website has not yet been updated as of the publication date of this article.

20. Sh. Matevosyan, *Bari Smaratsi: Non-governmental or Religious Organization?*, HAYOTS ASHKHAR (Yerevan, Armenia), 1, 5, Sept. 28, 2006 (on file with author – available only in Armenian). The locally based group Bari Smaratsi and the foreign based group Christian Adventurers International, as well as the Moscow based NGO Christians of Evangelic Belief, were organizers of the event to be held from September 21–30, 2006. On September 27, 2006, the mayor of Yerevan cancelled the festival. The decision was later upheld by the Ministry of Justice under article 3 of the Law on Non-Governmental Organization of the Republic of Armenia, which, in essence, makes the same controversial argument as article 8 of the Law on the Freedom of Conscience. However, despite the controversy, the group did in fact violate the law because it did not properly operate under the statutes governing its specific type of NGO. *Id.*

21. *Id.*

22. CONSTITUTION OF THE REPUBLIC OF ARMENIA art. 26.

23. Law on the Freedom of Conscience, *supra* note 24, § 17.

24. *Id.* § 7.

25. *Id.* § 17.

26. This assertion is based upon the personal knowledge of the author gained while working as an expert in the Department of Religious Affairs and National Minorities.

27. *Id.*

28. *Id.* Though Section 17 does not specifically limit the religious practices of other denominations, it does in fact reserve many rights solely to the Armenian Apostolic Church. *Id.*

may qualify as the imposition of undue limitations to the external freedom of other religious organizations. Thus, the provisions of the law are questionable with relation to group institutional rights, group collective rights, as well as individual rights.

There are also additional problems with the law in relation to the above-mentioned rights. For example, the law contains problematic issues regarding the official registration of religious organizations.²⁹ Section 5 of the Law on the Freedom of Conscience requires that an organization that wants recognition as a “Religious organization” must meet certain qualifications, including that it must be “based on a historically recognized holy scriptures,” and “[i]ts doctrine[] forms part of the international contemporary religious-ecclesiastical communities.”³⁰ Such requirements may be the instruments of discrimination and require religious organizations to prove facts that are beyond any group’s ability to effectively present. In mitigation, the above criteria might not be strictly followed when registering religious organizations; for example, the charitable activities of religious organizations, while technically against the law and reserved for the Armenian Church,³¹ are rarely restricted.

There is additional uncertainty associated with the possible application of Article 8.1 of the Constitution as it is to be incorporated into the Armenian domestic law.³² For example, currently there is a Draft Law on the Relations between the Armenian Church and the Republic of Armenia (“Draft Law”)³³ dated November 21, 2006, which simply repeats, in Articles 2, 6, and 10, the provisions of Section 17 of the current Law on the Freedom of Conscience.³⁴ This Draft Law also proposes recognition of church marriages performed by the Armenian Church.³⁵ Article 11 of the Draft Law merely echoes Section 12 of the Law on the Freedom of Conscience regarding voluntary charitable contributions made to Religious Organizations, and as such makes these contributions tax-free.³⁶ Article 8 of the Draft Law makes another important addition, suggesting that the Armenian Church’s approval is required for decisions regarding the public school courses on the History of the Armenian Church, including the content of the course and the teachers’ qualifications.³⁷ Meanwhile, Article 8 of the Draft Law does not make it clear if parents have the right to opt out of sending their children to study subjects as set forth by the Armenian Church³⁸, as these subjects may disagree with the perceptions of other belief systems.³⁹ The aforementioned problems are just some examples that can be singled out as those that Armenia needs to address. This need is demonstrated both by the discrepancies that have been discussed between the Law on the Freedom of Conscience and the Constitution, as well as due to incongruities with international norms.⁴⁰ However, other issues are also problematic from the freedom of association perspective, both under international and domestic law.

The issue of the national identity is probably one of the most essential in determining the public life and societal attitudes. The present day socio-political developments in Armenia raise questions in respect of how the Armenian identity is shaped with regards to political ideology of the nation. What are the pivotal factors that are reflected in the media and the state policy? What are the trends and what are the expectations resulting from the ways the national identity of a citizen is shaped? Do understand the

29. Though religious organizations are not required to register in order to exist in Armenia, there are several benefits which official registration allows, including the publishing of newspapers or magazines, renting of meeting places, broadcasting programs on television or radio, or officially sponsoring the visas of visitors. RELIGIOUS FREEDOM REPORT 2006, *supra* note 2.

30. Law on the Freedom of Conscience, *supra* note 24, § 5.

31. See citation at *supra* note 42.

32. CONSTITUTION OF THE REPUBLIC OF ARMENIA art. 8.1.

33. Draft Law on the Relations between the Armenian Church and the Republic of Armenia, Oct. 1, 2006 [hereinafter “Draft Law”], available at <http://www.parliament.am/drafts.php?sel=showdraft&DraftID=9486&lang=arm> (available only in Armenian).

34. See Law on the Freedom of Conscience, *supra* note 24, § 17; Draft Law, *supra* note 47, §§ 2, 6, 10.

35. See Draft Law, *supra* note 47.

36. *Id.* art. 11; see also Law on the Freedom of Conscience, *supra* note 9, § 12.

37. Draft Law, *supra* note 47, art. 8.

³⁸ The finally adopted version of the law after this article had been written included the wording “voluntary lesson” at public schools. This change to the draft reflected some of the debates on the draft version.

39. *Id.*

40. See *infra* Section III for a discussion of Armenian domestic law and international norms.

embraced path and its consequences for the nation? Could there finally be the alternatives to the ways the identity is currently shaped in Armenia?

To begin with the first question it is necessary to look into the terms that are going to be employed in this essay. The word “nation” is the one that eventually shapes the identity of the individual in a state. There is universally agreed version of what the “nation” should denote. It very well illustrates the existing so far models of the national state laid down by Smith in his work “Historic territory, legal-political community, legal-political equality of members, and common civic culture and ideology” that denote the western model. In a different model of ‘ethnic’ conception of the nation “presumed descent ties, vernacular language, customs and traditions”ⁱ. Fortunately or not so, the Parliamentary Assembly finally made some specifications about at least its perception for the states-members of the Council of Europe. It very much echoes the distinctions made by Smithⁱⁱ but adds up a crucial and important note for us to reflect on. “7. The Assembly notes that within the very complex process of nation building and of the nation-states’ birth, the modern European states founded their legitimacy either on the civic meaning of the concept of “nation” or on the cultural meaning of the concept. However, while the distinction between those two meanings is still to be identified in some of the Council of Europe member states’ constitutions, the general trend of the nation-state’s evolution is towards its transformation depending on the case, from a purely ethnic or ethnocentric state into a civic state and from a purely civic state into a multicultural state where specific rights are recognized with regard not only to physical persons but also to cultural or national communities.” The significance of the article is an alleged move of the modern state formation into a civic type of the state. Does this move really happen in this country? Where does Armenia go?

To reflect on these important questions, let us analyse two the most recent important changes that were made in the legislation. Firstly, let us consider the amendments in the Constitution of RA. Secondly, it is necessary to consider the recently adopted law on “the Republic of Armenia Regarding the Relationship between the Republic of Armenia and the Holy Apostolic Armenian Church”. Thirdly, we shall probe the ground of the nationalistic ideology that is poured into/across public channels of media sources. This is essential because the republic of Armenia is attempting to build an until recently non-existing national ideology of its own state. B. Anderson states that while constructing the nation it is possible to see that states make systemic, and in a Machiavellian fashion cynical infusion of the nationalistic ideology through the means of mass media, system of education, administrative decrees and so onⁱⁱⁱ.

The role that the Armenian Apostolic church played in the past was never contested. Nonetheless, it is always possible to ask if the role in question was continuously positive either in the building of the nation or shaping the statehood. Without questioning the extent of the negative of the role in the past it is arguable that the Church role is indeed positive in current stage of independent state. It is possible to posit that the church aspired to play not just a social role but also a political one. From the 1995 version of the Constitution no significant changes were made until 2005. Then there appeared an essential amendment that included an article 8.1

The church shall be separate from the state in the Republic of Armenia.

The Republic of Armenia recognizes the exclusive historical mission of the Armenian Apostolic Holy Church as a national church, in the spiritual life, development of the national culture and preservation of the national identity of the people of Armenia.

Freedom of activities for all religious organizations in accordance with the law shall be guaranteed in the Republic of Armenia.

The relations of the Republic of Armenia and the Armenian Apostolic Holy Church may be regulated by the law.

Then the Law on the Relationship b/w ROA and the Holy Apostolic Armenian Church (henceforth the Law on the Relationship) was introduced in January 2007. There are two essential points that link the sudden legislative activity implicating the church following the election of the new Catolicos and continuous strengthening the Republican party from 2000 and onwards. No such an articles existed in the previous version of the Constitution. No public debates of the provisions of the Constitution and the Law can practically be found. The irony of the situation is that both of the changes within the Constitution and the new law were introduced by with a large support of governing party or parties and especially the Republican one. The question remains as to what was the role of the church in proposing such changes. Two issues are essential about the mentioned above amendment. The newly introduced article is quite in contradiction to itself. It states that the state is separate from church and yet it also states that the Republic recognises the exclusive historical mission of Armenian Apostolic Holy Church as a national church^{iv}. Then the article 2 of the Law on the Relationship “The Republic of Armenia recognizes the Holy Apostolic Armenian Church as the national church...”. Another troubling feature of the law is the possibility of introducing religious education which is said to be voluntary but it s questionable given the existing problems with the rule of law^v. The wording “national” also leaves an open space for doubt about the character of the state being separate from the church as the “national” is often understood from the position of the international law as state related^{vi}. The doubt is also strengthened by the role that some of the printed and TV media plays for the past years.

On one hand, the some of the public channels were continuously proactive and aggressive with questioning activities of “sects” for several years now. This activity was always especially acute in respect of the Jehovah’s witnesses. Other churches and religious groups were also under attack of the television channels, for example, the protestant group churches in Armenia. The focus of the criticism would always be such topics as religious groups versus family or individual, army and the right to manifest one’s own belief or religion and many other subjects. On the other hand, some of the printed and internet media also addressed the issue of “worrying” growth and activity of the other religious groups in general and in particular as threatening the place of the predominant church. For example, one of the news agencies raises the question that some of the singers belong to “sects”. The groups that singers may belong to are confirmed by a representative of the Armenian Apostolic church as indeed belonging to «sects»^{vii}. The quotation shows that a media outlet distinguishes a citizen on the basis of the affiliation as presuming this fact at least strange. Another typical example can be taken from alleged number of suicides of those who belong to «sects»^{viii}. Why no one asks what is the rate of suicides of persons belonging to the predominant church in comparison. The reactionary nature of the raising the question of

religious affiliation as being of the “sectarian” simply assumes some questions. For example, does Armenian identity should presume belonging to the Armenian Apostolic Church only? Why an individual of living in the modern world and manifesting any different religion or manifesting none should consider affiliated to the predominant church or religious group. Does a good or bad citizen should presume belonging or not to this or other church? Does attaching a stigma of belonging to a «sect» become a conventional way of differentiating true Armenians from the rest^{ix}? Is this where we go in making the «national identity»?

It is worrying that the developments of the legislative process and the coverage that the religious life receives are tending to point out the directions of shaping the Armenian identity. It is equally clear that the recent developments of the legislative process and the political evolution of the party system hardly speak of the advance of the civic nation state. Instead, we are being pushed towards an ethnic nation state where the ruling factions of the government exploit the public ignorance and sentiments with an appeal to the past. The move is created via appeal to the glorious role of the church in the past. What we see, however, at present that there is a growing estrangement of the individuals and groups from the nation irrespective of their religious affiliation. The estrangement is performed on the basis of this identity construction. With years of atheistic propaganda during the Soviet era behind, the indiscriminate labeling of people at present is another extreme process run ironically and very likely by the Republican party of Armenia. This asks the question what the true republicanism and the state ideology must be in making national identity.

In what regards the political ideology of republicanism, it rests on the laws that are secular in nature. No one must be compelled to belong to a religious group or to have any belief. Republicanism does not oppose a religion but it does not support and finance it either. The spiritual heritage of the republic must be protected irrespective of the confession it was created by. The rights and freedoms of the citizens must be protected via Constitution. The republic must develop the idea of civic ideology with the right of every person to develop alone or manifest together with his community his individuality and his belief. The laws of the republican state are neutral in respect of religious groups and approve of any activity that they [religious groups] conduct towards the common public good. Finally the laws of the republic must be formulated so that to protect the interests of not only majority but also minority.

ⁱ Smith, A. *National Identity* (University of Nevada Press, Reno, 1991) 11-12

ⁱⁱ “6. The Assembly also acknowledges that whenever the concept of “nation” means citizenship it designates some kind of a contractual relation between a physical person and a state, while when the concept of “nation” means an ethno-cultural community it designates a cultural reality (a cultural fact or a cultural status) which is based on the free and unilateral association of a physical person to that community and involves only the relations among the members of that community. A nation in its cultural understanding becomes a subject of law (see international law) only if it organizes itself as a state which is internationally recognised.” in Recommendation 1735 (2006), Parliamentary Assembly, Council of Europe

ⁱⁱⁱ B., Anderson. *Imagined Communities* (“Kanon-press-Ts”, “Kuchkovo Pole”, Moscow, 2001) 131-132

^{iv} Article 8.1 The Constitution Of The Republic Of Armenia (With Amendments), 2005

^v Article VII, c) of The Relationship b/w ROA and the Holy Apostolic Armenian Church, (2007)

^{vi} For example, the European Convention on Nationality article 2, a) states “nationality” means the legal bond between a person and a State...;

^{vii} “Some of Our Singers are Sectarian” in *Panorama* <www.panorama.am> 14/02/2007

^{viii} «A Sectarian Woman is a Cause of Death of Her Own Kid» in *Azg Daily* <www.azg.am> 03/02/2007

^{ix} A representative of the pagan group in Armenian qualifies of the other confessions including there those of the Christian religion as «sectarian» «Pagan Gods Power the Arians» in *Azg Daily* <www.azg.am> 22/03/2007