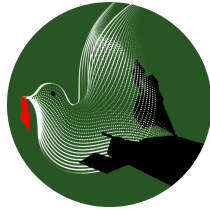


THE ENDOWMENT JUSTICE COLLECTIVE



RUTGERS IS COMPLICIT IN GENOCIDE. WE DEMAND:

(1) DIVESTMENT FROM ANY FIRM OR CORPORATION MATERIALLY PARTICIPATING IN, BENEFITTING FROM, OR OTHERWISE SUPPORTING THE STATE OF ISRAEL'S SETTLER COLONIALISM, APARTHEID, AND GENOCIDE OF PALESTINE AND THE PALESTINIAN PEOPLE, IN ACCORDANCE WITH THE PRINCIPLES FOR DIVESTMENT LISTED IN UNIVERSITY POLICY 40.2.14.

(2) TERMINATION OF RUTGERS' PARTNERSHIP WITH TEL AVIV UNIVERSITY INCLUDING WITHIN THE NEW JERSEY INNOVATION AND TECHNOLOGY HUB.

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The following divestment request is set forth to the Rutgers University's Joint Committee on Investments (JCOI) on behalf of the Endowment Justice Collective (EJC), a broad-based coalition of dozens of student organizations at Rutgers University supported by a vast network of student, faculty, alumni, staff, and community organizing partners. Our demands are motivated by Rutgers University's complicity in Israel's genocide, apartheid, and settler colonialism of Palestine and its people. Through its investments and institutional affiliations, Rutgers maintains ties to Israel's oppressive regime which directly implicates the University in the campaign of mass murder and ethnic cleansing of the Palestinian people from their land.

As the bombs rain down on Gaza, it is clear that what is required of us – the University and all of its affiliates – at this moment is unequivocal ethical integrity. Along with organizations and institutions across the country, Rutgers faces a critical choice: to stand by and support relentless violence against Palestinians that has been and continues to be condemned by civil societies, nation-states and international bodies around the world, or to act as a partner in justice by severing all institutional and financial ties with Israel as a consequence of the latter's crimes against humanity. On behalf of the numerous students, faculty, staff and community members at Rutgers – those who do the daily work of carrying out the University's mission and values – who do not consent to Rutgers' complicity in Israel's violence, we submit this document demanding that the University correct its course. We offer the following case in the sincerest hopes that Rutgers will heed our call to act with the moral clarity and fortitude that the occupation of Palestine and the current genocide in Gaza demands of us.

I. Introduction: The Occupation of Palestine and Genocide in Gaza

To speak as clearly and directly as possible, what we are witnessing today is a genocide of the Palestinian people by the state of Israel. As we have watched in real time, Israel's relentless bombardment of Gaza over the past six months has produced unimaginable suffering for the people of Palestine, killing thousands of children, families, and people attempting to flee. At the time of writing, more than 32,000 Palestinians in Gaza have been killed by Israeli attacks since October 7th, about two thirds of whom are women and children. Over 8,000 Palestinians remain missing, buried alive under the rubble from Israeli bombings, and over 75,000 people have been injured.¹ Approximately 17,000 children have become orphaned or separated from family, a figure so high as to have occasioned the creation of a new acronym by doctors and aid workers: WCNSF, standing for "Wounded Child, No Surviving Family."² The scale of death and destruction reflected in these numbers is nothing short of catastrophic. Given its unprecedented daily death toll, Oxfam has already declared the genocide in Gaza to be the "deadliest conflict in the 21st century".³

A key feature of Israel's genocidal campaign has been creating conditions of life aimed at destroying the Palestinians in Gaza. A staggering 1.9 million Palestinians, more than 80% of Gaza's population, have been internally displaced within a strip of land 25 miles long.⁴ Israeli forces have been restricting the entry of food, water, electricity and medicine into Gaza⁵, imposing apocalyptic conditions upon the civilians trapped inside, 47% of whom are children⁶. Children have begun to die of starvation and dehydration in Gaza, and a large majority of Gaza's population now faces "emergency" or "catastrophic" levels of hunger⁷: these conditions are the

¹ AJLabs, "Israel-Gaza War in Maps and Charts: Live Tracker," *Al Jazeera*, March 21, 2024, accessed March 20, 2024, <https://www.aljazeera.com/news/longform/2023/10/9/israel-hamas-war-in-maps-and-charts-live-tracker>.

² Asmar, Ahmed. "Around 100,000 people in Gaza killed, injured, missing: UN agency for Palestinians chief." Anadolu Agency, February 6, 2024.

<https://www.aa.com.tr/en/middle-east/around-100-000-people-in-gaza-killed-injured-missing-un-agency-for-palestinians-chief/3128663>.

³ Linah Alsaafin, Brian Osgood, and Ali Harb, "Israel's War on Gaza Live: 'Deadliest Conflict in 21st Century', Says Oxfam," *Al Jazeera*, January 14, 2024,

<https://www.aljazeera.com/news/liveblog/2024/1/11/israels-war-on-gaza-live-israel-pounds-gaza-ahead-of-icj-genocide-hearing>.

⁴ Norwegian Refugee Council. "Gaza: Forced and protracted displacement of Palestinians would constitute a serious breach of international law and an atrocity crime," December 26, 2023.

<https://www.nrc.no/news/2023/december/gaza-displacement/>.

⁵ Associated Press, "Food aid reaches north Gaza for first time in weeks," *Politico*, February 28, 2024,

<https://www.politico.com/news/2024/02/28/food-aid-reaches-north-gaza-for-first-time-in-weeks-00143998>

⁶ Explainer, "Is Israel's Gaza war the deadliest conflict for children in modern times?" *Al Jazeera*, November 7, 2023,

<https://www.aljazeera.com/news/2023/11/7/is-israels-gaza-war-the-deadliest-conflict-for-children-in-modern-times#:~:text=Gaza%20has%20a%20population%20of,Gaza's%20population%2C%20according%20to%20UNICEF>

⁷ Sana Noor Haq, Ibrahim Dahman, AbdulQader Sabbah, Abeer Salman, CNN, "Newborns die of hunger and mothers struggle to feed their children as Israel's siege condemns Gazans to starvation," *CNN World*, March 7, 2024, <https://www.cnn.com/2024/03/06/middleeast/israel-gaza-starvation-siege-mothers-babies-intl/index.html>

direct result of Israel's use of starvation as a weapon of warfare, which is a war crime⁸. Israeli forces have also obliterated Gaza's healthcare system; all of its 36 hospitals have been damaged, destroyed, or are non-functional due to the restriction of fuel entry.⁹ While the statistics do not end here, these figures point to the vast human suffering produced by Israel's indiscriminate and unrelenting attacks. Children missing limbs and burying parents¹⁰, people lacking the most basic of hygiene products¹¹, adults withering due to missed cancer treatments¹², babies reduced to skin and bone from malnourishment¹³, doctors operating without access to anesthetics¹⁴ – each day brings images somehow even more horrifying than the last. Beyond the numbers, these scenes speak to the intimate, visceral forms of suffering imposed upon Palestinians by the state of Israel and should scar our collective humanity.

Settler Colonialism and Occupation

Far from beginning on October 7th, the war on Palestine is inseparable from the settler-colonial settlement and occupation of the land and its people that has been ongoing for at least a hundred years. Following the end of the Second World War, the British government issued the Balfour Declaration of 1917 seeking the “establishment in Palestine of a national home for the Jewish people” at the expense of indigenous Palestinians.¹⁵ European and especially British colonizers subsequently initiated efforts to settle the land of Palestine and violently suppress Palestinians' rights to self-determination¹⁶; these efforts culminated in the Nakba (“catastrophe”) of 1948 that founded the state of Israel through the forced expulsion of over 750,000 Palestinians.¹⁷ In violation of international law, Palestine remains illegally occupied and subject to ongoing settler

⁸ Human Rights Watch, “Israel: Starvation Used as Weapon of War in Gaza,” *Human Rights Watch*, December 18, 2023, <https://www.hrw.org/news/2023/12/18/israel-starvation-used-weapon-war-gaza>

⁹ Sparrow, Annie, and Kenneth Roth. “Israel-Hamas War: Destroying Gaza's Health Care System Is a War Crime.” *Foreign Policy*, February 9, 2024.

<https://foreignpolicy.com/2024/02/09/israel-gaza-health-care-hospitals-genocide-icj/>.

¹⁰ Jessie Yeung, Radina Gigova, Mohammed Tawfeeq, CNN. “More than 10 children losing legs in Gaza every day as dire health crisis grows, aid groups say,” *CNN World*, January 7, 2024,

<https://www.cnn.com/2024/01/08/middleeast/gaza-children-losing-legs-disease-intl-hnk/index.html>

¹¹ Batrawy, Aya. “Women in Gaza are desperately in need of washrooms, privacy and pads” *NPR*, January 5, 2024, <https://www.npr.org/2024/01/05/1223193875/women-in-gaza-are-desperately-in-need-of-washrooms-privacy-and-pads>

¹² Alsaafin, Linah & Amer, Ruwaida. “Out of medicines, care: Gaza's cancer patients face death amid Israel war” *Al Jazeera*, November 14, 2023,

<https://www.aljazeera.com/news/2023/11/14/out-of-medicines-care-gazas-cancer-patients-face-death-amid-israel-war>

¹³ Haq, Sana Noor, Dahman, Ibrahim, Sabbah, AbdulQader, & Salman, Abeer, CNN. “Newborns die of hunger and mothers struggle to feed their children as Israel's siege condemns Gazans to starvation” *CNN World*, March 7, 2024, <https://www.cnn.com/2024/03/06/middleeast/israel-gaza-starvation-siege-mothers-babies-intl/index.html>

¹⁴ Cuddy, Alice. BBC News, “Gaza doctors: ‘We leave patients to scream for hours and hours’” *BBC*, February 18, 2024, <https://www.bbc.com/news/world-middle-east-68331988>

¹⁵ Balfour, Arthur J. *Balfour Declaration, November 2, 1917*. From The Avalon Project, *20th Century Documents: 1900 - 1999*. https://avalon.law.yale.edu/20th_century/balfour.asp

¹⁶ Dana, Tariq, and Ali Jarbawi. “A Century of Settler Colonialism in Palestine: Zionism's Entangled Project.” *The Brown Journal of World Affairs* 24, no. 1 (2017): 197–220. <https://www.jstor.org/stable/27119089>.

¹⁷ Al Jazeera. “The Nakba Did Not Start or End in 1948,” May 23, 2017. <https://www.aljazeera.com/features/2017/5/23/the-nakba-did-not-start-or-end-in-1948>.

colonial violence by Israeli military forces¹⁸. In the West Bank and Gaza Strip, known collectively as the “Occupied Palestinian Territories,” Israel’s apartheid and military rule disrupt every aspect of Palestinians’ daily lives, including whether, when, and where they can travel, work, live, go to school, grow food, and access basic necessities like water and electricity¹⁹. Moreover, the crime of apartheid applies not just in Occupied Palestinian Territories, but across the entire area under Israeli control.²⁰ Thus, amid the persistent war crimes, crimes against humanity, and violations of human rights which have characterized Israel’s occupation and apartheid for decades (see Appendix A), the current assault on Gaza may be contextualized as the latest and by far deadliest escalation of long-standing efforts to forcibly remove or otherwise eliminate the Palestinian people from their land.

Global Response

Rising in lockstep with Israel’s intensification of violence against Palestinians are resounding condemnations of its actions from the international community. As early as December 2023, the United Nations General Assembly adopted a resolution recognizing the urgency of an immediate ceasefire with the favorable vote of 153 countries²¹. On January 26, the International Court of Justice (ICJ), the world’s highest international court, sided with the Republic of South Africa in finding that Israel’s continual breaches of Palestinian human rights are tenable scaffolds of genocide and issued six legally binding measures requiring that Israel do more to protect Palestinian civilians in the Gaza Strip²². On February 15, the CEOs of seven prominent international human rights organizations, including Oxfam International and the Amnesty International, published a joint statement condemning Israel’s escalations and its dwindling provision of life-saving services and resources to Palestinians²³. These calls and more (see Appendix B) have all gone unheeded as Israel’s genocidal campaign continues: since the ICJ hearings, Israeli forces have drastically slowed aid deliveries to Palestinians in the Gaza strip,

¹⁸ United Nations Human Rights, “Commission of Inquiry finds that the Israeli occupation is unlawful under international law,” *United Nations*, October 20, 2022, <https://www.ohchr.org/en/press-releases/2022/10/commission-inquiry-finds-israeli-occupation-unlawful-under-international-law>

¹⁹ Amnesty International, “Israel’s Apartheid Against Palestinians,” *Amnesty International*, February 1, 2022, <https://www.amnesty.org/en/latest/campaigns/2022/02/israels-system-of-apartheid/>

²⁰ A Threshold Crossed, “Israeli Authorities and the Crimes of Apartheid and Persecution,” *A Threshold Crossed*, April 27, 2021, <https://www.hrw.org/report/2021/04/27/threshold-crossed/israeli-authorities-and-crimes-apartheid-and-persecution>

²¹ Meeting Coverage and Press Releases, “General Assembly Adopts Resolution Demanding Immediate Humanitarian Ceasefire in Gaza, Parties’ Compliance with International Law, Release of All Hostages” United Nations, December 12, 2023, <https://press.un.org/en/2023/ga12572.doc.htm>

²² International Court of Justice, “Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip,” *International Court of Justice*, January 26, 2024, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240126-ord-01-00-en.pdf>

²³ “Rafah, Gaza: Urgent Statement from CEOs of Humanitarian & Human Rights Organizations,” Press release, *Oxfam International*, February 15, 2024, <https://www.oxfam.org/en/press-releases/rafah-gaza-urgent-statement-ceos-humanitarian-human-rights-organizations>

destroyed facilities belonging to aid groups Médecins du Monde and Doctors Without Borders²⁴, and killed an additional 3,500 Palestinians from the time of the ICJ ruling on January 26 to February 24 alone²⁵— all in flagrant contravention to the conditions of justice to which it is legally beholden. These violations of international law make clear Israel’s position as a rogue and volatile actor on the global stage.²⁶

With all the world’s eyes on Gaza, the need for immediate action to stop Israel’s genocidal violence is clear. Every actor complicit in upholding Israel’s violent and oppressive regime is implicated in this call to action. As declared by attorney Philippe Sands during the ICJ’s most recent public hearings on the state of Palestine, which included contributions from 52 nations and 3 international bodies on Israel’s decades-long occupation of Palestine²⁷: “No aid. No assistance. No complicity. No contribution to forcible actions. No money, no arms, no trade, no nothing. All UN Members are obliged by law to end Israel’s presence on the territory of Palestine. Period.” Rutgers University, too, must heed these words and end its complicity in Israel’s genocide and occupation of Palestine and its people. It is thus in the spirit of justice and global solidarity with Palestine that we submit our demands below.

²⁴ PBS News Hours, “Human Rights Watch Says Israel is violating order from top U.N. court by blocking aid to Gazans,” *Thirteen PBS*, February 26, 2024, <https://www.pbs.org/newshour/world/human-rights-watch-says-israel-is-violating-order-from-top-u-n-court-by-blocking-aid-to-gazans>

²⁵ Explainer, “Has Israel complied with ICJ order in Gaza genocide case?” *Al Jazeera*, February 26, 2024, <https://www.aljazeera.com/news/2024/2/26/has-israel-complied-with-icj-order-in-gaza-genocide-case#:~:text=Between%20the%20January%2026%20ruling,were%20injured%20in%20Israeli%20attacks>

²⁶ Amnesty International News, “Israel must comply with key ICJ ruling ordering it do all in its power to prevent genocide against Palestinians in Gaza,” *Amnesty International*, January 26, 2024, <https://www.amnesty.org/en/latest/news/2024/01/israel-must-comply-with-key-icj-ruling-ordering-it-do-all-in-its-power-to-prevent-genocide-against-palestinians-in-gaza/>

²⁷ UN Web TV, “The Hague – The International Court of Justice (ICJ) holds public hearings in the advisory proceedings - State of Palestine,” *United Nations*, February 19, 2024, <https://webtv.un.org/en/asset/k13/k13rkfn015>

II. Our Demands

(1) DIVESTMENT FROM ANY FUND WITH HOLDINGS IN FIRMS OR CORPORATIONS MATERIALLY PARTICIPATING IN, BENEFITTING FROM, OR OTHERWISE SUPPORTING THE STATE OF ISRAEL'S SETTLER COLONIALISM, APARTHEID, AND GENOCIDE OF PALESTINE AND THE PALESTINIAN PEOPLE, IN ACCORDANCE WITH THE PRINCIPLES FOR DIVESTMENT LISTED IN UNIVERSITY POLICY 40.2.14.

In calling for divestment from corporations materially participating in, benefiting from, or otherwise supporting Israel's settler colonialism, apartheid, and genocide of Palestine and its people, we adopt the following three definitions set forth by the United Nations (UN):

Settler Colonialism

The *Declaration on the Granting of Independence to Colonial Countries and Peoples* (UN General Assembly Resolution 1514 of 1960) defines colonialism as the "subjection of peoples to alien subjugation, domination and exploitation, [which] constitutes a denial of fundamental human rights," a system that is "contrary to the Charter of the United Nations and is an impediment to the promotion of world peace and co- operation."²⁸ Settler colonialism has the additional aim for the colonizing power to displace a native population of a territory and replace it with a settler population.

Apartheid

As defined by the UN in Article II of the International Convention on the Suppression and Punishment of the Crime of Apartheid, the crime of apartheid includes "similar policies and practices of racial segregation and discrimination as practised in southern Africa" and "appl[ies] to the following inhuman acts committed for the purpose of establishing and maintaining domination by one racial group of persons over any other racial group of persons and systematically oppressing them: (a) Denial to a member or members of a racial group or groups of the right to life and liberty of person... (b) Deliberate imposition on a racial group or groups of living conditions calculated to cause physical destruction in whole or in part; (c) Any legislative or other measures calculated to prevent a racial group or groups from participation in the political, social, economic and cultural life of the country and the deliberate creation of conditions preventing the full development of such a group or groups... (d) Any measures, including legislative measures, designed to divide the population along racial lines... (e) Exploitation of labour of the members of a racial group or groups; (f) Persecution of

²⁸ UN General Assembly, "Declaration on the Granting of Independence to Colonial Countries and Peoples," *Refworld: Global Law & Policy Database*, December 14, 1960, <https://www.refworld.org/legal/resolution/unga/1960/en/7290>

organizations and persons, by depriving them of fundamental rights and freedoms, because they oppose apartheid.”²⁹

Genocide

As defined by the UN in Article 2 of Convention on the Prevention and Punishment of the Crime of Genocide, 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.”³⁰

Our Demand for Divestment

An investigation by the Endowment Justice Collective into Rutgers University’s endowment fund holdings has revealed that the University invests in index funds containing corporations that materially (that is, monetarily or in kind) participate in and/or benefit from the above issues. These funds include, but are not limited to: PGIM Quantitative Solutions (US), PGIM Quantitative Solutions (EM), PGIM Quantitative Solutions (EAFE), Alger Small Cap Focus, Vulcan Value Partners, Wellington Select China, and Eagle Cap. Recent reporting by the Daily Targum corroborates that Rutgers University’s holdings in these index funds are substantial.³¹ Corporations in these funds include weapons manufacturers, technology and security companies, and construction companies which develop, manufacture and sell products used in Israel’s genocide of Palestinians and enforcement of apartheid and settler colonial violence. The role that each of these corporations plays in the perpetration of Israel’s occupation, apartheid, and genocide of Palestine and its people are detailed in [Section IV, Part C \(1\)](#) of this document.

We demand that the JCOI conduct a thorough review of the endowment funds’ assets in accordance with our standards for divestment in order to better understand the scope of the University’s complicity with Israeli state and military atrocities. Understanding that such a review will necessarily exceed the timeliness of the ongoing siege on Gaza, we demand that the University divest at the earliest possible opportunity from the following corporations (including their subsidiaries and affiliated entities):

²⁹ UN General Assembly, “International Convention on the Suppression and Punishment of the Crime of Apartheid,” *Refworld: Global Law & Policy Database*, November 30, 1973, <https://www.refworld.org/legal/agreements/unga/1973/en/26955>

³⁰ UN General Assembly, “Convention on the Prevention and Punishment of the Crime of Genocide,” *Refworld: Global Law & Policy Database*, December 9, 1948, <https://www.refworld.org/legal/agreements/unga/1948/en/13495>

³¹ Arishita Gupta, Yash Goyal, and Maya Stokley, “Special Report: Targum Investigates U. Endowment Ahead of Divestment Referendum,” *The Daily Targum*, March 24, 2024, <https://dailytargum.com/article/2024/03/special-report-targum-investigates-u-endowment-ahead-of-divestment>.

Lockheed Martin, RTX Co, Boeing Co, Northrop Grumman, L3 Harris Technologies, General Dynamics, General Electric Co, Textron Inc, Motorola Solutions, Amazon.com Inc, Alphabet Inc, Tata Motors, Tata Consultancy Services Limited, General Motors, Ford Motor Co, Caterpillar, Chevron, and Cemex.

Divestment is imperative regardless of the size of the University's holdings in companies which enable Israel's genocidal violence. If these investments are substantial, divestment is all the more imperative as an ethical and humanitarian obligation. If they are minor, the financial burden of divestment for the University will be relatively small. Indeed, the size of the University's investments in these companies should be irrelevant in considerations of whether or not Rutgers should divest: as stated in University policy 40.2.14, "The primary purpose of any divestment is to express unequivocally and publicly the University's view on an issue rather than to bring about an economic impact through our endowment's investment action." As such, divestment is an opportunity for Rutgers University to stand firm in its commitment to justice and refuse its complicity in a campaign of genocide and widespread ethnic cleansing.

To be clear: the material consequences of divestment are secondary to the impact this momentous public step would have. Of course, the financial implications, too, should not be diminished: whether the University's investments in the corporations above are big or small, *every dollar* invested in the horrific mass murder and debilitation of Palestinian civilians is one dollar too many. Moreover, given the long-term horizon of endowment fund investments, it is inconceivable that divestment from corporations benefiting from the genocide in Gaza would constitute catastrophic or irreparable harm to the endowment in the long run, whatever the short-term risks to portfolio returns. There are alternatives, and it is the responsibility of the JCOI, the Investment Consultant, Office, and managers to identify and secure them.

(2) TERMINATION OF RUTGERS'S PARTNERSHIP WITH TEL AVIV UNIVERSITY INCLUDING IN THE NEW JERSEY INNOVATION AND TECHNOLOGY HUB.

While the partnership targeted by this demand has been developed and codified through other administrative, contractual, and financial means than through the investment of endowment funds, we believe that the substantive structural similarity between Rutgers's investment in corporations benefiting from Israel's apartheid and genocide and the University's engagement with Tel Aviv University is sufficient to merit its consideration by the JCOI, the Board of Governors and the Board of Trustees in this venue.

2021 Memorandum of Understanding and the NJ Innovation and Technology Hub

On November 17, 2021, Rutgers University and Tel Aviv University (TAU) signed a memorandum of understanding (MOU) intending to strengthen the partnership between the two universities and allow TAU to establish a presence in the New Jersey Innovation and Technology

Hub, a 550,000 square foot, \$665 million project under construction in New Brunswick.³² Scheduled to open in 2024, the NJ Innovation and Technology Hub is designed to serve as an incubator for companies and projects developing innovations in science and technology.³³ The inclusion of TAU in the facility aims primarily to foster stronger academic and economic ties between TAU and Rutgers, but also and by extension to solidify and extend institutional and financial ties between Israel and the state of New Jersey.

Far from a politically neutral engagement, TAU's inclusion in the Hub advances Rutgers's collaboration with an institution that has played a critical role in enabling violence and oppression against the Palestinian people. As a public institution, TAU is structurally tied to the wider Israeli state. At the same time, the university has demonstrated itself to be a willing and active partner in the wider Israeli state's occupation, apartheid, and genocide of Palestine and Palestinians. Its close connections with weapons development for the Israeli military, its role in shaping Israel's security policy, and its historical and ongoing exploitation of Palestinian land and bodies are detailed in [Section IV, Part C: 2](#) of this document. As such, EJC demands that Rutgers terminate all extant MOUs and contracts with TAU, including any active or promised leases or other allowance of space within the Hub, and further sever any and all ties with TAU.

Academic Exchanges Enabled by the Rutgers-TAU Partnership

The partnership between Rutgers and TAU bolstered by the 2021 MOU began in 2020.³⁴ While Rutgers President Jonathan Holloway has commended the alliance as one that “will advance educational and scientific exchanges” to benefit each university's students, faculty, communities and local economies, a detailed investigation of the activities which the partnership has enabled demonstrates how this alliance has facilitated troubling links between Rutgers University and TAU's role in perpetuating Israel's violence against Palestinians.

Prior to the 2021 MOU, the two universities collaborated to host joint scientific symposia on topics ranging from the COVID-pandemic to nanomaterials.³⁵ As part of this series, the research symposium hosted on January 25, 2021, on “Trends in Cybersecurity” featured a presentation by Dr. Eran Tromer, then an associate professor in the School of Computer Science and Co-Director of the CheckPoint Institute for Information Security (CIIS) at Tel Aviv University.³⁶ CIIS was established and is funded through a partnership between TAU and Check Point Software

³² Rutgers University, “Rutgers and Tel Aviv University Enter Partnership to Boost Research Collaboration,” November 17, 2021, <https://www.rutgers.edu/news/rutgers-and-tel-aviv-university-enter-partnership-boost-research-collaboration>.

³³ “NJIH | Helix NJ Health and Life Science Exchange,” n.d., <https://www.helixnj.com/njih>.

³⁴ Tel Aviv University, “Tel Aviv University and Rutgers University Strengthen Ties,” November 29, 2021, <https://english.tau.ac.il/news/tau-rutgers-2021>.

³⁵ Marisol Seda, “Rutgers & Tel Aviv Universities Kick off Joint Scientific Symposium Series,” Rutgers University Office for Research, November 16, 2020, <https://research.rutgers.edu/news/rutgers-tel-aviv-universities-kick-joint-scientific-symposium-series>.

³⁶ Rutgers Research, “Rutgers & Tel Aviv Universities Joint Research Symposium: Trends in Cybersecurity,” April 11, 2021, <https://www.youtube.com/watch?v=MSSJHLGNpZE>.

Technologies, an Israeli security company whose executives have worked in elite military intelligence units in the Israeli Defense Force (IDF).³⁷ Under the leadership of these former IDF intelligence experts, Check Point maintains close ties with the Israeli military. It has partnered with some of Israel's largest weapons manufacturers, including Israel Aerospace Industries, whose Heron drones have been used in assaults on Gaza.³⁸ Like other companies in Israel's high-tech sector, Check Point benefits from the perpetuation of occupation and apartheid through the opportunity to use occupied Palestine territories as a testing ground, incubator, and deployment locale for its products.³⁹ As such, Rutgers University's decision to host the director of an Israeli institute involved in such abhorrent activities is atrocious and unacceptable. In welcoming a scholar with direct links to a company helping to enforce violence against Palestinians, this joint symposium represented a significant, public-facing escalation of Rutgers's complicity in Israel's occupation and apartheid.

Joint Research Enabled by the Rutgers-TAU Partnership

Among other things, the 2021 MOU between Rutgers and TAU aimed to strengthen the universities' alliance by establishing a research grant program. The TAU-Rutgers University Research Collaboration Fund was founded to provide seed funding for collaborative research projects, each headed by one principal investigator from Rutgers and one from TAU. Among the six projects which received funding in its first year, as announced in September 2022, was a project led by Dr. Emilia Fridman, member of the Faculty of Engineering at TAU, and Dr. Laurent Burlion, Professor of Mechanical and Aerospace Engineering at Rutgers.⁴⁰ Interestingly, while their joint project was titled "Development of Time Delay Software Technology to Power Systems" in announcements to the public, Dr. Burlion's personal website indicates that the original title of the project was "Advanced Time Delay Control Methods for Aerospace Autonomous Systems".⁴¹

Dr. Burlion's and Dr. Fridman's military and industry ties leave little room for doubt that their research project was aimed at developing innovations in drone technology. Dr. Laurent Burlion's research interests are in control systems with aerospace applications including spacecraft,

³⁷ Dian Schaffhauser, "Tel-Aviv U and Check Point Establish InfoSec Research Institute," *Campus Technology*, May 1, 2008,

<https://campustechnology.com/articles/2008/05/telaviv-u-and-check-point-establish-infosec-research-institute.aspx>.

³⁸ "Check Point Software: Ex-Israeli Military Spooks Profiting From the Cyber-security Industry," *Corporate Watch*, November 25, 2019,

<https://corporatewatch.org/check-point-software-ex-israeli-military-spooks-profiting-from-the-cyber-security-industry/>.

³⁹ "Israel Has Turned the Occupied Territories Into a Laboratory for State Terror," interview by Antony Loewenstein and Mattha Busby, July 12, 2023,

<https://jacobin.com/2023/07/israel-occupation-surveillance-security-state-technology-export>.

⁴⁰ New Jersey Economic Development Authority (NJEDA), "Researchers at Rutgers and Tel Aviv Universities Set to Receive \$200,000 in Seed Grants to Further Collaborative Projects," Press release, September 22, 2022,

<https://www.njeda.gov/researchers-at-rutgers-and-tel-aviv-universities-set-to-receive-200000-in-seed-grants-to-further-collaborative-projects/>.

⁴¹ Laurent Burlion, "Laurent Burlion, Rutgers, Aerospace" Laurentburlion, n.d., <https://www.laurentburlion.com/>.

aircraft, and unmanned aerial systems (also known as drones), and he has served as the director of the Advanced Control laboratory, a lab space for testing drone performance, since 2019.⁴² Prior to coming to Rutgers, Dr. Burlion spent several years working for the French Department of Defense. During this time, he also worked closely with Airbus Defence and Space,⁴³ a corporation which develops and manufactures combat systems for land, air, sea, space and cyber around the world,⁴⁴ and has partnered with Israel Aerospace Industries to provide technology for surveillance and military transport aircraft.⁴⁵

Dr. Emilia Fridman, meanwhile, has made significant contributions to the study of control of time-delay systems and has developed methods which she acknowledges have direct applications in drone technology.⁴⁶ Moreover, Dr. Fridman belongs to the Faculty of Engineering at TAU, which holds a very close relationship with Israel's arms industry. At the 2019 AUS&R Conference and Exhibition on Unmanned Systems and Robotics, the TAU engineering department held a demonstration of autonomous drone technology to companies in the defense industry and military and police personnel.⁴⁷ This event catalyzed collaboration between TAU engineering faculty and Elbit Systems, Israel's largest weapons manufacturer. These engagements have continued, for instance through additional meetings between senior executives from Elbit systems and researchers in TAU's Faculty of Engineering that explicitly aim to strengthen ties between research and industry and facilitate the transfer of knowledge and technology from TAU to Israeli weapons manufacturers such as Elbit.⁴⁸

Through the TAU-Rutgers University Research Collaboration Fund, Dr. Burlion and Dr. Fridman received up to \$30,000 USD for their joint research project. This grant was part of a combined \$200,000 in funds awarded for collaborative research, made possible through a \$100,000 contribution from TAU and a \$100,000 contribution from Rutgers and the state of New Jersey.⁴⁹ Given that one of the selection criteria used to evaluate projects was the "likelihood that the

⁴² Laurent Burlion, "Research Areas," Laurentburlion, n.d., <https://www.laurentburlion.com/about-me>.

⁴³ Laurent Burlion, Curriculum vitae.

https://www.laurentburlion.com/_files/ugd/59f14e_ab6b566f589c43c4b0cb54eea916355b.pdf. PDF.

⁴⁴ "Airbus Defence," Airbus, n.d., <https://www.airbus.com/en/defence>.

⁴⁵ Airbus Military, "Airbus Military and Israel Aerospace Industries Come Together on AEW&C Programme," Defence IQ, June 21, 2011,

<https://www.defenceiq.com/air-forces-military-aircraft/press-releases/airbus-military-and-israel-aerospace-industries-co>.

⁴⁶ Tel Aviv University, "2021 Kadar Family Award - Prof. Emilia Fridman," October 14, 2021,

<https://www.youtube.com/watch?v=K3XzmxWQ1GU>.

⁴⁷ Tel Aviv University, "AUS&R הרחפנים האוטונומיים של הפקולטה להנדסה הדגימו את היכולות שלהם בכנס" [the Faculty of Engineering's Autonomous Drones Demonstrated Their Capabilities at the AUS&R Conference]," The Ivy and Alder Fleishman Faculty of Engineering, October 22, 2019,

<https://engineering.tau.ac.il/Engineering-Faculty-conference-AUS-and-R-2019>.

⁴⁸ Tel Aviv University, "מפגש של חוקרי אוניברסיטת תל אביב עם מובילים טכנולוגיים בהברת 'אלביט' [A Meeting of Tel Aviv University Researchers With Technological Leaders at 'Elbit' Company]," August 3, 2021,

<https://www.tau.ac.il/news/elbit-22-7-21>.

⁴⁹ New Jersey Economic Development Authority (NJEDA), "Researchers at Rutgers and Tel Aviv Universities Set to Receive \$200,000 in Seed Grants to Further Collaborative Projects."

project will lead to long-term research relationships and generate on-going collaboration”, it is likely that this collaboration has endured past the award period and continues to produce innovations in drone technology that will be taken up by Israeli weapons manufacturers. As such, the collaborations enabled by Rutgers’ and TAU’s growing partnership have already intensified Rutgers’ complicity in Israel’s violence against Palestinians in deeply concerning ways.⁵⁰

Our Demand for Termination of the Rutgers-TAU Partnership

The 2021 Rutgers-TAU MOU further promises information sharing between the two research universities.⁵¹ Overall, the partnerships pursued in activities and statements such as these suggest that additional efforts to develop the universities’ alliance, including through Rutgers’ provision of leasable or otherwise usable real estate for TAU within the Hub, will provide opportunities for Rutgers’ resources, scholarship, and prestige to be leveraged in service of Israel’s oppression of Palestinians. Rutgers’s extant and promised continuation of complicity with the Israeli genocide in Gaza must end now – not only through the termination of Rutgers-TAU collaborations specifically focused on cybersecurity and weapons development, but through Rutgers’ severance of all ties with TAU. Any collaboration which serves to bolster TAU’s reputation, provide it with a public platform, or materially support its operations shores up the legitimacy of an institution which aids and abets Israel’s oppression and genocide of Palestinians. Thus, Rutgers University must cease any and all efforts to cooperate with TAU now and in the future.

⁵⁰ Rutgers University Office of Research, “Tel Aviv University - Rutgers University Research Collaboration Fund,” n.d., https://research.rutgers.edu/sites/default/files/2022-02/Rutgers-TAU-Seed_Grant_RFA.pdf. PDF.

⁵¹ Carly Baldwin, “Tel Aviv University the Newest Tenant at Rutgers’ Tech Hub,” *NJ Patch New Brunswick*, November 17, 2021, <https://patch.com/new-jersey/newbrunswick/tel-aviv-university-newest-tenant-rutgers-tech-hub>.

III. The Precedent for Divestment at Rutgers University

The JCOI is already well aware of Rutgers' complicity in Israel's apartheid through its endowment fund investments. In 2020, the Endowment Justice Collective submitted a request entitled "Rutgers University: A Case for Ethical Divestment" to the JCOI, detailing the University's need to cut financial ties with corporations involved in the operations of Israel's apartheid. While the divestment call included in this request went unheeded, with the effect that University endowment funds have financially enabled the named corporations to support the Israeli genocide against Palestinians in Gaza, the JCOI now has an opportunity to right its past wrongs by ending its material complicity with this genocide at a time in which it has never been more urgent and imperative to do so.

There is more than sufficient precedent for the University to divest based on its refusal to be complicit in humanitarian crises. In 2021, Rutgers issued an approval to divest from fossil fuels; in 2009, divested from companies with operations in Sudan in recognition of the humanitarian crisis in Darfur; and most notably, in 1985, it declared total divestment of \$6.4 million from more than ten companies connected with apartheid South Africa, becoming one of over twenty academic institutions to divest.⁵² Thus, the University has demonstrated on multiple occasions that it is capable of socially responsible divestment from companies whose behavior, action, and products are morally and ethically untenable.

In 1985, Rutgers' announcement of its intent to divest from South African apartheid followed on heels of New Jersey's decision to divest its pension funds from companies doing business in South Africa based on consideration of its ethical and humanitarian obligations. As then Governor of New Jersey Thomas H. Kean remarked, "Apartheid is a unique example of the institutionalization of racism and the codification of inequality. At some point, certain evils become so intolerable that we as a people must stand up and object. ... The state simply cannot escape involvement in the question of investment in South Africa."⁵³ Today, we are once again calling upon the University to stand up and object to the evils of apartheid. Rutgers' ongoing complicity in the genocide of the Palestinian people and Israel's occupation and apartheid regime stands in regrettable defiance of not only its own history of socially responsible divestment, but also the demands of its students and larger community, the University's core mission and values, and a growing body of legal and human rights arguments for measures to be taken against Israel due its ongoing crimes against humanity.

⁵² Alicea, Julio. "Rutgers University Students Win Divestment From Apartheid South Africa, 1985." Edited by Max Rennebohm. Global Nonviolent Action Database, August 10, 2011.

<https://nvdatabase.swarthmore.edu/content/rutgers-university-students-win-divestment-apartheid-south-africa-1985>.

⁵³ Thomas H. Kean, "Concerning Divestiture of New Jersey State Pension Funds from Companies Doing Business in South Africa." August 20, 1987.

https://governors.rutgers.edu/wp-content/uploads/2020/06/kean_speech_1985-08-20_Divestiture.pdf. PDF.

IV. The Case for Divestment, According to University Policy 40.2.14

[Rutgers University Policy 40.2.14](#), adopted on May 8, 2002 and most recently revised on December 7, 2023, includes a policy advisory statement to the Joint Committee on Investments (JCOI) developed by the Rutgers University Committee on Divestment.⁵⁴ In framing the importance of a divestment policy, the Committee on Divestment recognizes “that [the university’s] concerns extend beyond our campuses and that the research, teaching, and service of the University addresses problems so as to benefit citizens locally, regionally, nationally and globally.” Rutgers University’s concern about its impacts on a global scale must include the material implications of its investments for the lives and wellbeing of people around the world. As such, the JCOI should be deeply concerned with how its management of the University’s \$1.98 billion endowment currently supports the ongoing enforcement of apartheid and genocide against the Palestinian people.

The advisory statement (Appendix B of the Policy) states that “the following principles should be applied when evaluating divestment recommendations:

- The divestment is consistent with the fiduciary obligation of the JCOI and the Boards;
- The behavior, action, or product in question is antithetical to the core mission or values of the university;
- The organization, industry or entity to be divested has sole or shared responsibility for the concern(s) identified; and
- The concern reflects the consensus of the University community.”

The acute humanitarian crisis underway in Gaza and the longer settler project of the Israeli state in Palestine meet all four of the above criteria. Specifically, the current crisis merits Rutgers’ divestment through: (1) the University’s endowment funds investments in corporations benefiting from Israel’s genocide of Palestinians in Gaza, as well as Israel’s long-standing perpetration of apartheid and settler colonialism in Palestine; and (2) partnership with Tel Aviv University (TAU), including through the NJ Technology and Innovation Hub. As such, the JCOI’s (and, by extension, the wider University’s) failure to divest from corporations materially benefiting from relationships with the Israeli state and cut all actual and promised contractual ties with TAU would constitute a gross failure to uphold the express purpose of Policy 40.2.14.

A. Fiduciary Obligation of the JCOI and the Boards

Given that the first criteria stated in Policy 40.2.14 evaluates whether divestment meets the fiduciary obligation of the JCOI and the Boards, this section focuses on evidence for why

⁵⁴ “University Policy Section 40.2.14,” Rutgers University Finance and Administration, accessed March 31, 2024, <https://finance.rutgers.edu/sites/default/files/2024-01/40.2.14%20-%20Investment%20Policy%20Statement.pdf>.

Rutgers' investments in corporations upholding Israel's occupation and apartheid – beyond being ethically untenable – also constitute a financial liability.

First, any investment in Israel's occupation and apartheid regime assumes confidence in an inherently unstable arrangement of power, as Israel's very existence depends on continuous violence against and oppression of Palestinians. Rutgers' own holdings in corporations facilitating this arrangement mean that the profitability of its investment portfolio depends in part on Israel's success in maintaining its state of apartheid. Were Israel to lose its hold on Palestine, this would hold severe negative implications for the value of Rutgers' investments.

Yet in addition to this ethico-political precarity, Israel's economy is widely acknowledged to be unstable. Even before October 7, 2023, Israel's judicial reforms had begun to generate significant financial uncertainty: as a June 2023 IMF report stated, "Continued uncertainty around the judicial reform presents a notable downside risk...which, if continuing, could come at a large cost to the economy". The report further elaborated: "Among the specific channels through which investment could be affected is the relocation of high-tech firms. If a large enough number of firms in the sector relocated, Israel's strong economic growth potential could be jeopardized".⁵⁵ Notably, many of Rutgers' investments in corporations upholding Israel's genocide and apartheid apparatus belong to the high-tech sector. As such, the threats to its stability detailed in the IMF report present troubling risks to the long-term profitability of these investments.

Other sources corroborate Israel's growing economic uncertainty. An April 2023 OECD report also expressed concern that Israel's booming tech sector, which accounts for 15% of GDP and half of all exports, had begun to show signs of weakness,⁵⁶ while a Haaretz analysis published in February 2023 declared that there was "no doubt, including among the foreign bankers and speculators" that the judicial reforms would "cast a huge shadow on the Israeli economy". As the Haaretz analysis emphatically concluded, "Hundreds of economists from Israel and around the world, hundreds of analysts at foreign banks and dozens more in Israeli financial institutions who normally are reserved about expressing views – economists at the Bank of Israel, the chief economist of the Finance Ministry and the columnists of the business papers in Israel and around the globe, including Prime Minister Benjamin Netanyahu's friends such as Larry Summers and Martin Wolf – all can testify to this."⁵⁷

⁵⁵ International Monetary Fund, "Israel: 2023 Article IV Consultation-Press Release; Staff Report; and Statement by the Executive Director for Israel.," *IMF Staff Country Reports*, June 15, 2023, <https://www.imf.org/en/Publications/CR/Issues/2023/06/14/Israel-2023-Article-IV-Consultation-Press-Release-Staff-Report-and-Statement-by-the-534778>. 57.

⁵⁶ Organisation for Economic Co-operation and Development (OECD), "OECD Economic Surveys: Israel 2023," *OECDiLibrary*, April 3, 2023, https://www.oecd-ilibrary.org/economics/oecd-economic-surveys-israel-2023_901365a6-en.

Since October 7, the genocide in Gaza has only worsened Israel's economic crisis. Ongoing uncertainty regarding the expected severity and duration of the war have generated profound instability for Israel's economic activities. On November 27, 2023 Bloomberg reported that the genocide produced a "crash in activity" that "hit everything from restaurants to banks", and that Israeli stocks were the "world's worst performers since start of war".⁵⁸ More recent reporting paints an even grimmer portrait: Israel's GDP plunged by 20% in the last three quarters of 2023, surpassing even already pessimistic predictions,⁵⁹ and the government has had to turn to pursuing near-record levels of borrowing in order to finance its costly military efforts.⁶⁰ As the war drags on, investors are growing increasingly concerned about the implications of the ongoing genocide for Israel's fiscal health: as Bloomberg reported on January 16, 2024, "A 70 billion-shekel (\$19 billion) surge in expenditure and an estimated drop of 36 billion shekels in revenues will push this year's deficit to 6.6% of gross domestic product, a shortfall that would be among the widest for Israel this century".⁶¹ Given that, as in any market, investors are watching each other's moves to determine their own courses of action, faltering investor confidence in Israel does not bode well for the value and profitability of Rutgers' investments.

In short, the immense uncertainty and volatility in Israel's economy produced by the genocide suggests that divestment would better serve the fiduciary interests of the JCOI and, by extension, the University, than Rutgers' current state of complicity. If the role of the JCOI is partly to assess appropriate levels of risk for the University's investment strategy, the Committee's decision to publicly and materially sever ties with Israel would help minimize risk at a time when Israel's economy is growing increasingly turbulent and its position on a global stage increasingly contentious.⁶² Even for those who do not find the Israeli state's activities morally repugnant, it is undeniable that Israel, and by extension, its institutions, represents a lightning rod for division and heated public opinion in this historical moment. Rutgers would do well to select less risky and controversial affiliations in both its investments and institutional partnerships. Whatever academic, financial, or material benefits Rutgers gets out of its partnership with Tel Aviv University, it could derive from partnerships with any number of other world-class research universities which appear to be (and indeed are) far less problematic.

⁵⁸ Galit Altstein, "Israel's War Effort Is Giving Its Economy a Covid-Like Shock," *Bloomberg*, October 30, 2023, <https://www.bloomberg.com/news/articles/2023-10-30/israel-economy-hit-by-covid-like-shock-through-war-against-hamas?srnd=undefined&embedded-checkout=true>.

⁵⁹ Hanna Ziady, "Israel's Economy Slumps 19.4% in the Fourth Quarter as War Takes a Toll," *CNN Business*, February 19, 2024, <https://www.cnn.com/2024/02/19/economy/israel-gdp-war-economy/index.html>.

⁶⁰ Galit Altstein, "Israel, Just Downgraded, Readies Bond Spree to Pay for War Against Hamas," *Bloomberg*, February 11, 2024, <https://www.bloomberg.com/news/articles/2024-02-11/israel-just-downgraded-readies-bond-spree-to-pay-for-war-in-gaza-against-hamas?srnd=undefined&embedded-checkout=true>.

⁶¹ Galit Altstein, "Israel War Budget Exposes Rifts and Leaves Markets on Edge," *Bloomberg*, January 16, 2024, <https://www.bloomberg.com/news/articles/2024-01-16/israel-war-budget-approval-exposes-rifts-leaves-markets-on-edge?srnd=undefined&embedded-checkout=true>.

⁶² Anna Gordon, "New Polling Shows How Much Global Support Israel Has Lost," *TIME*, January 17, 2024, <https://time.com/6559293/morning-consult-israel-global-opinion/>.

B. Violations of the Core Mission or Values of the University

Rutgers University Policy 40.2.14 states that the second criteria for considering divestment requests is whether “the behavior, action, or product in question is antithetical to the core mission or values of the university.” According to the University's mission statement, Rutgers University has the threefold mission of:

- Providing for the **educational needs** of New Jersey through our undergraduate, graduate, and continuing education programs;
- Conducting **cutting-edge research** that contributes to the health, environmental, social, and cultural well-being of the state, nation, and world, as well as strengthening the economy and supporting businesses and industries; and
- Performing **public service** in support of the needs of the people of the state and their local, county, and state governments.

In addition, Rutgers University defines its values as “**academic excellence** that's both accessible and affordable; building a **beloved community** where every single member of the university has a voice; and serving the **common good** while making a meaningful difference in the world.”

1. Violations Addressed by Demand (1): Divestment from Complicit Corporations

Rutgers University's investments in corporations that provide critical material support to Israel's genocide, apartheid, and settler colonial violence against the Palestinian people is fundamentally antithetical to its mission and values on each and every term of the latter.

In the first place, the University's complicity in the ongoing genocide against Palestinians stands in stark contradiction to its commitment to providing for the **educational needs** of its students, as Israel's assault directly harms the academic community, resources, and knowledge available to Rutgers students. In a strategy that human rights groups argue is tantamount to a war crime, Israel has deliberately targeted Gaza's academic community and infrastructure. Since October 2023, the Israeli military has systematically destroyed every single university in the Gaza strip,⁶³ and destroyed or damaged approximately 378 schools.⁶⁴ It has killed 94 university professors, including many academic, scientific, and intellectual figures across various disciplines.⁶⁵ Among them are renowned poet and professor of English literature Refaat Alareer and scientist Sufiyan

⁶³ “No University Left Standing in Gaza,” interview by Natasha Lennard and Ahmed Alhussaina (The Intercept, February 9, 2024), <https://theintercept.com/2024/02/09/deconstructed-gaza-university-education/>.

⁶⁴ Chandni Desai, “The War in Gaza Is Wiping Out Palestine's Education and Knowledge Systems,” The Conversation, January 14, 2024, <https://theconversation.com/the-war-in-gaza-is-wiping-out-palestines-education-and-knowledge-systems-222055>.

⁶⁵ Euro-Med Human Rights Monitor, “Israel Kills Dozens of Academics, Destroys Every University in the Gaza Strip,” Press release, January 20, 2024, <https://euromedmonitor.org/en/article/6108/Israel-kills-dozens-of-academics,-destroys-every-university-in-the-Gaza-Strip>.

Tayeh, a prominent researcher in theoretical physics and applied mathematics.⁶⁶ These targeted assaults have also destroyed numerous libraries, archives, and museums, such as the National Museum, which housed over 3,000 rare artifacts and was bombed alongside Al-Israa University in January 2024.⁶⁷

Variously referred to as “educide”,⁶⁸ “scholasticide”,⁶⁹ and “epistemicide”.⁷⁰ Israel’s assaults on the academic communities and infrastructure in Gaza seek to destroy Gaza’s past, halt Palestinians’ production of knowledge and decimate the potential to rebuild in Gaza. As such, Israel is also destroying the opportunity for students around the world, including at Rutgers, to learn from Palestinian intellectuals, whose capacity to narrate the memory of their people is irreplaceable. The University cannot be said to be acting in accordance with its mission to provide for educational needs when it is complicit in a campaign to actively harm students and scholars and destroy educational resources.

To the extent, too, that Rutgers University serves as a model to its students for ethical global leadership, its complicity in Israeli genocide against Palestinians severely undercuts its credibility and integrity as an educational actor. Education, in its truest form, seeks to enlighten minds, foster critical thinking, and cultivate a sense of justice and global stewardship among students. However, by investing in companies actively enforcing genocide and apartheid, Rutgers compromises its educational ethos. Through these investments, the University not only perpetuates a covert curriculum of complicity, but also fosters an environment of complacency, effectively sanitizing its participation in ethical misconduct. This approach misleadingly suggests that such financial entanglements with the Zionist project only serve to enrich students’ academic success and our institution’s standings, while in reality, they bolster one of the most oppressive regimes known for targeting educational institutions, including UN schools and colleges.⁷¹ Israel’s acts of violence, funded in part through Rutgers University’s endowment, starkly contradict the sanctity of learning and knowledge dissemination, and the University’s involvement leaves its community’s Palestinian diaspora further disconnected from Rutgers’ mission. By prioritizing fiscal advancement over moral imperatives, Rutgers implicitly teaches its students that ethical considerations are subordinate to financial gain, thereby eroding the

⁶⁶ Shree Paradkar, “How Israel’s ‘scholasticide’ Denies Palestinians Their Past, Present and Future,” *Toronto Star*, January 21, 2024, https://www.thestar.com/news/world/how-israels-scholasticide-denies-palestinians-their-past-present-and-future/article_8f52d77a-b648-11ee-863d-f3411121907b.html.

⁶⁷ Desai, “The War in Gaza Is Wiping Out Palestine’s Education and Knowledge Systems.”

⁶⁸ Katherine Hearst, “War on Gaza: Killing of Gaza’s Academics Amounts to ‘Educide,’ Say Campaigners,” *Middle East Eye*, January 31, 2024, <https://www.middleeasteye.net/news/war-gaza-israel-killing-academics-educide-campaigners-say>.

⁶⁹ Desai, “The War in Gaza Is Wiping Out Palestine’s Education and Knowledge Systems.”

⁷⁰ Abdulla Moaswes, “The Epistemicide of the Palestinians: Israel Destroys Pillars of Knowledge,” *Institute for Palestine Studies (IPS)*, February 2, 2024, <https://www.palestine-studies.org/en/node/1655161>.

⁷¹ Patrick Jack, “Academia in Gaza ‘Has Been Destroyed’ by Israeli ‘Educide,’” *Times Higher Education (THE)*, January 29, 2024, <https://www.timeshighereducation.com/news/academia-gaza-has-been-destroyed-israeli-educide>.

foundational ethical pillars upon which this institution is supposed to stand.

Second, the University's mission to "conduc[t] **cutting-edge research** that contributes to the health, environmental, social, and cultural well-being of the state, nation, and world" is undermined by its complicity in Israel's violence against Palestinians. Rutgers University's investments in companies upholding Israel's genocide effectively force all of its academic community into complicity as well, as these investments mean that the research which Rutgers scholars and students work so hard to produce is partly enabled by the enrichment of companies facilitating Palestinians' death and debilitation. In other words, while research conducted by Rutgers scholars may itself contribute to advancing the well-being of others, its financial ties to genocidal violence means that the sum total of its impact also includes devastating consequences for Palestinian people facing Israeli oppression. Israel's genocide in Gaza has indisputably negative consequences for "health, environmental, social, and cultural well-being". It has resulted in over 32,000 killed and over 75,000 injured in Gaza; caused immense environmental damage;⁷² destroyed families, communities, and various social institutions; and demolished sites of cultural heritage and practice, such as places of worship and cultural archives. As such, Rutgers University's complicity in Israeli genocide through its investments detracts from the net impact of the research conducted by its academic community. The JCOI's decision to sever financial ties to the morally reprehensible corporations facilitating Israeli genocide would allow the University to fulfill its mission of producing research that wholly benefits the global community.

Third, the University's complicity in Israeli genocide and apartheid is also antithetical to its mission to "perfor[m] **public service** in support of the needs of the people of the state and their local, county, and state governments". It should go without saying that helping to enable a humanitarian crisis and widespread death and debilitation does not conform to any notion of public service. The horrific violence that the University helps fund may seem far away, but it is often against the families and communities of its own students. Moreover, New Jersey is home to one of the largest Palestinian populations in the United States.⁷³ While the grief, anger, and demands of the Palestinian diaspora in New Jersey, along with the state's Arab and Muslim populations, have been largely ignored by state and local governments, Rutgers University has the opportunity to send a public and unequivocal message through divestment that it will no longer contribute to the mass ethnic cleansing of Palestinians. Severing financial ties with corporations actively assaulting the families and communities of Rutgers students and other New Jersey residents *is the bare minimum* for performing "public service" which supports the needs

⁷² Adrian Finighan, "How Much Environmental Damage Is Israel's War on Gaza Causing?," *Al Jazeera*, December 14, 2023, <https://www.aljazeera.com/program/inside-story/2023/12/14/how-much-environmental-damage-is-israels-war-on-gaza-causing>.

⁷³ Jasmine Garsd, "In a Palestinian Enclave in New Jersey, Grief Pervades Everything," *NPR*, October 21, 2023, <https://www.npr.org/2023/10/21/1207695663/palestinians-new-jersey-gaza-grief>.

of many of those who call Rutgers and the state of New Jersey their home.

Finally, the University's investments in companies supporting Israeli genocide and apartheid is also incompatible with its three stated core values. First, the **academic excellence** to which the University aspires depends upon a vibrant and diverse global academic community. Such a community is actively jeopardized by the targeted destruction of students, scholars, and educational infrastructure. As such, a University committed to academic excellence cannot stand behind Israel in its relentless assault upon Palestine's education and knowledge systems. Next, **beloved community** requires mutual respect, care, and compassion – none of which can exist when the University is complicit in the relentless bombardment of the families and communities of many of its own students. As for serving the **common good**, allow us to state the obvious by saying that supporting a campaign that aims to eliminate a people through genocide; that commits war crimes and other crimes under international law; that has resulted in hundreds of thousands of people facing imminent starvation;⁷⁴ that has wiped out entire families and neighborhoods; and that, according to Amnesty International, has brought “unimaginable suffering to people who are already facing a dire humanitarian crisis” cannot be said to be serving the common good.

2. Violations Addressed by Demand (2): Termination of Partnership with Tel Aviv University

Rutgers University's partnership with Tel Aviv University also directly impedes its ability to carry out its mission statement and act according to its values. The details of the University's complicity with Israel's crimes against humanity by way of this partnership are described in [Section II\(2\)](#) of this document. Here, we focus on the specific ways in which Rutgers' partnership with TAU – beyond its moral repugnance – additionally and directly violates each of the specific tenets of the University's core mission and values.

To begin with, Rutgers's ongoing partnership with an institution whose members and affiliates have participated in acts and projects ranging from the ethically dubious to the outright disastrous, is a clear breach of the University's mission to provide for the **educational needs** of New Jersey and perform **cutting-edge research** that contributes to the health, environmental, social, and cultural well-being of the state, nation, and world. For example, the University's financial, administrative, and marketing contributions to research on drone technology with TAU, as detailed in Section II(2), encourage an approach to education in which students and scholars neglect to think critically about the ethical ends of their educational pursuits and the implications of their choices in collaborators. Were such considerations taken into account, it would be obvious that research which aims to improve the design and performance of drone

⁷⁴ Helen Regan and Chris Lau, “Hundreds of Thousands Are Starving in Gaza as Famine Arrives at ‘Incredible Speed,’ UN Aid Chief Warns,” *CNN*, January 16, 2024, <https://www.cnn.com/2024/01/16/middleeast/gaza-famine-starvation-un-israel-war-intl-hnk>.

technologies weaponized by the Israeli state for its violent repression of the Palestinian people, far from contributing to the well-being of any person, group, or state, directly enhances the capacity of a rogue state to commit crimes against humanity in clear violation of international law – to say nothing of common decency. In this shocking but clarifying situation, the cost of developing such a “cutting-edge” technology is measurable directly in preventable death. Rutgers JCOI has the opportunity to reevaluate and redirect the use of its considerable resources away from death-dealing endeavors and towards humane, sustainable ones. The University must not continue to make the wrong choice.

Moreover, beyond research on weapons development, Tel Aviv University’s material and ideological imbrications with Israel’s settler colonial project jeopardize the very possibility for ethically sound education and research to be conducted under its auspices. To give another example, the Greenberg Forensic Institute, which is part of Tel Aviv University’s Sackler School of Medicine, currently retains the remains of sixty-two dead Palestinians and refuses to return them to their families for proper burial or rest.⁷⁵ Programs within the Institute permit and engage in the dissection of detained bodies without the family’s permission, and the Institute has admitted to a history of unauthorized removal of organs, bones, and tissues from the bodies of these deceased Palestinians.⁷⁶ Yet, as is evident in the resolution of the recent scandal regarding the retention of the remains of victims of the 1985 MOVE bombing at the Penn Museum, an affiliate of the University of Pennsylvania, ethically and intellectually upright pedagogy is impossible under conditions of institutional secrecy and the refusal of the right of the dead and their loved ones to consent to participation in ostensibly educational programming. Indeed, as the Penn Museum itself has affirmed the “ethical stewardship of human remains and [prioritizing] human dignity” require institutional transparency and the participation and consent of the dead or their loved ones; where these conditions are not met, restitution requires the return of the remains. Failing this, ethical education and research are impossible.⁷⁷

At the same time, all of the above-noted actions by TAU (independent and in collaboration with members of the Rutgers University community) call into question Rutgers’s adherence to its mission to perform **public service** in support of the needs of the people of the state and their local, county, and state governments. According to the 2020 census, New Jersey is home to more residents of Middle Eastern and North African (MENA) descent than all but six other U.S. states, and relative to its total population is home to proportionally more members of these communities

⁷⁵ Al-Haq: Law in the Service of Man, Jerusalem Legal Aid and Human Rights Center (JLAC), and Cairo Institute for Human Rights Studies (CIHRS), “Joint Submission to EMRIP and UN Experts on the Israeli Policy of Withholding the Mortal Remains of Indigenous Palestinians,” June 22, 2020, https://www.alhaq.org/cached_uploads/download/2020/06/27/200622-joint-submission-on-the-israeli-policy-of-withholding-the-mortal-remains-of-indigenous-palestinians-22-june-2020-final-1593240783.pdf.

⁷⁶ Ian Black, “Doctor Admits Israeli Pathologists Harvested Organs Without Consent,” *The Guardian*, December 21, 2009, <https://www.theguardian.com/world/2009/dec/21/israeli-pathologists-harvested-organs>.

⁷⁷ Penn Museum, “Towards a Respectful Resolution,” September 2023, <https://www.penn.museum/about-collections/statements-and-policies/towards-respectful-resolution>.

than all of those states.⁷⁸ Members of New Jersey’s MENA communities, which include Palestinians living in the U.S. and people of Palestinian descent, are the likeliest to be directly affected by Israel’s current siege on Gaza and its long-standing, illegal occupation of the Palestinian territories. Moreover, these communities are also most likely to be indirectly affected by the current genocidal assault on Gaza as Israeli attacks on neighboring states such as Lebanon threaten to precipitate a wider regional conflict. If public service can be defined as the provision of any good or service (be it by a state institution such as Rutgers or a private entity) that advances the interests of a territorially-bound constituency or public, such as the residents of New Jersey, it is difficult to rationalize Rutgers’s continued partnership with TAU as the pursuit of a public service. On the contrary, in light of the above-detailed information, Rutgers’s close connection with and support for TAU more accurately resembles a betrayal rather than affirmation of the public interests of the residents of New Jersey and especially the MENA communities therein.

Regarding the University’s core values, the “accessible and affordable” **academic excellence** to which Rutgers aspires is inherently unattainable when the University is forcing its students to share a campus with their oppressor. In pursuing a partnership with TAU, what the University fails to consider are the potentially devastating effects of this alliance – especially, but by no means exclusively, in the form of TAU’s physical presence in the Hub – on members and affiliates of the Rutgers community who have experienced direct or indirect harms caused by Israel’s violence upon Palestine, harms in which TAU is materially and ideologically complicit. Indeed, on the theme of accessibility, we are deeply troubled by the cruelty and injustice of the fact that while President Holloway traveled to Tel Aviv to sign the 2021 MOU, and while TAU has been promised a physical space in the heart of New Brunswick, many of Rutgers’ own Palestinian students and faculty would not be permitted to set foot on Tel Aviv University’s campus.

Rutgers’ partnership with TAU is also antithetical to its second value of “building a **beloved community** where every single member of the university has a voice”. As a matter of fact, the University’s refusal thus far to terminate its partnership with TAU – the very impetus for much of this document – is evidence of Rutgers’ past failures to recognize the voices and needs of its students and community members. In January 2022, Students for Justice in Palestine at Rutgers-New Brunswick and Rutgers-Newark issued a letter to President Holloway demanding that Rutgers terminate its MOU with Tel Aviv University,⁷⁹ organizing a campaign that garnered no fewer than 7,252 signatories.⁸⁰ As their original letter so powerfully states, “How can

⁷⁸ Rachel Marks, Paul Jacobs, and Alli Coritz, “Lebanese, Iranian and Egyptian Populations Represented Nearly Half of the MENA Population in 2020 Census” (United States Census Bureau, September 21, 2023), <https://www.census.gov/library/stories/2023/09/2020-census-dhc-a-mena-population.html>.

⁷⁹ Students for Justice in Palestine Rutgers New Brunswick and Rutgers Newark, “Re: Memorandum of Understanding with Tel Aviv University” Letter, 2023.

⁸⁰ Students for Justice in Palestine Rutgers New Brunswick, “Tell the Rutgers administration: Tel Aviv University is not welcome on the New Brunswick campus!” Petition, 2023.

Palestinian students and allies expect to safely voice their solidarity when their own University administration engages in such close partnerships with their oppressor?” Rutgers University now has an opportunity to correct its moral failings by terminating its partnership for TAU once and for all. This decision would also allow the University to act in accordance with its stated purpose of “serving the **common good** while making a meaningful difference in the world”, its third and final core value. Stated plainly, the University’s decision to sever ties with an institution so manifestly culpable in Israel’s genocide, apartheid, and settler colonial violence would make a positive and meaningful impact on the world.

C. Sole or Shared Responsibility for the Concern(s) Identified

The third criteria for evaluating divestment requests, according to University Policy 40.2.14, is that “[t]he organization, industry or entity to be divested has sole or shared responsibility for the concern(s) identified”. This section brings together an abundance of evidence demonstrating that the organizations and corporations targeted by our demands play a critical role in enforcing Israel’s genocide and apartheid against the Palestinian people.

1. Responsibility of Corporations Addressed in Demand (1)

Demand (1) calls upon the University to divest from any company upholding Israel’s genocide, apartheid, and settler colonialism in Palestine and against its people. The EJC has identified a list of specific companies in the Endowment with which the JCOI should start, including Lockheed Martin, RTX Co, Boeing Co, Northrop Grumman, L3 Harris Technologies, General Dynamics, General Electric Co, Textron Inc, Motorola Solutions, Amazon.com Inc, Alphabet Inc, Tata Motors, Tata Consultancy Services Limited, General Motors, Ford Motor Co, Caterpillar, Chevron, and Cemex. Details regarding each company’s role in the current genocide in Gaza and/or past assaults upon Palestinian civilians and the enforcement of Israel’s apartheid/illegal settlements follow in the paragraphs below.

While this section aims to identify a range of actors who hold significant culpability in Israel’s genocidal violence, we wish to emphasize that this list is not comprehensive. Rather, it is the responsibility of the ad hoc committee to be created in response to this divestment request, according to University Policy 40.2.14, pending the determination of the JCOI chair and the Chief Financial Officer, to evaluate the entirety of the University’s investment portfolio for its inclusion of any additional corporations that fit the criteria of involvement in settler colonialism, apartheid, and/or genocide.

Weapons Manufacturers Arming Genocide

The following companies in the University’s endowment fund are demonstrably culpable in the crime of genocide, as defined by the UN, for providing the weapons with which Israel deliberately kills and causes serious bodily and mental harm to Palestinians, inflicts conditions of life calculated to bring about physical destruction, and ultimately renders life for Palestinians on their land impossible.

Lockheed Martin is a direct actor in the genocide of Palestinians through its production of “fighter jets, attack helicopters, armored vehicles, missiles, surveillance radars, and other weapon and surveillance systems,” which are provided to and used mercilessly by the Israeli military.⁸¹ Per the American Friends Service Committee (AFSC), Lockheed Martin is the largest military contractor on the planet generating \$67 billion in annual revenue in 2022, literally profiting off of war, death, and destruction. The military contractor has supplied Israel with F-16 and F-35 fighter jets, Hellfire missiles, and multiple launch rocket systems which have been used to precisely target civilians and civilian infrastructure in Gaza,⁸² as well as enact ruthless bombardment in 2008, 2009, 2012, 2014, 2021, 2022,⁸³ and most recently, in the ongoing genocide in 2023 and 2024 – in which over 100,000 Palestinians have been killed, maimed or dismembered alongside millions displaced within Gaza.⁸⁴

RTX Co formerly known as Raytheon Technologies, makes missiles, bombs, components for fighter jets, and other weapon systems used by the Israeli military against Palestinian civilians.⁸⁵ For years, these weapons have repeatedly been used against Palestinian civilians, resulting in numerous casualties as well as mass destruction of homes and civilian infrastructure, including hospitals, schools, and water and electric systems. RTX was a primary arms supplier for the 2008-2009 “Operation Cast Lead” during which Israel killed 1,385 Palestinians and over 308

⁸¹ American Friends Service Committee, “Lockheed Martin Corp,” AFSC Investigate, December 13, 2022, <https://investigate.afsc.org/company/lockheed-martin>.

⁸² Amnesty International, “Israel/OPT: New Evidence of Unlawful Israeli Attacks in Gaza Causing Mass Civilian Casualties Amid Real Risk of Genocide,” February 14, 2024, <https://www.amnesty.org/en/latest/news/2024/02/israel-opt-new-evidence-of-unlawful-israeli-attacks-in-gaza-causing-mass-civilian-casualties-amid-real-risk-of-genocide/#:~:text=%E2%80%9CAmnesty%20International%27s%20research%20provides%20clear,amid%20an%20unprecedented%20humanitarian%20catastrophe>.

⁸³ American Friends Service Committee, “Lockheed Martin Corp.”

⁸⁴ Usaid Siddiqui and Brian Osgood, “Israel’s War on Gaza Updates: ‘Unprecedented’ Destruction as Deaths Mount,” *Al Jazeera*, February 5, 2024, <https://www.google.com/url?q=https://www.aljazeera.com/news/liveblog/2024/2/5/israels-war-on-gaza-live-israeli-strikes-level-homes-in-deir-el-balah&sa=D&source=docs&ust=1711902522880742&usg=AOvVaw3xdAgwjfmZbT8IMtsTM4>.

⁸⁵ American Friends Service Committee, “RTX Corp,” AFSC Investigate, October 29, 2022, <https://investigate.afsc.org/company/rtx>.

children, with evidence of war crimes published by the United Nations,⁸⁶ Amnesty International,⁸⁷ and Human Rights Watch.⁸⁸

Boeing Co supplies the Israeli military with a wide variety of weapons that are routinely used for war crimes against Palestinian civilians. These include fighter jets, attack helicopters, missiles, bombs, and precision-guided bomb kits. Immediately after October 7th, Boeing expedited delivery of 1,000 so-called “smart” bombs,⁸⁹ and 1,800 joint direct attack munition (JDAM) kits to Israel.⁹⁰ While the purpose of JDAM kits is to convert these bombs into precision-guided munitions, such increased precision has not prevented their usage from resulting in numerous civilian deaths, leading human rights organizations to conclude that at least some of these civilians were deliberately targeted.⁹¹ According to a former United Nations weapons inspector, Boeing’s JDAMs were almost certainly among the weapons used in a November 1 bombing of Gaza’s Jabalia refugee camp.⁹² This attack killed hundreds of Palestinian civilians and could amount to a war crime, according to the UN High Commissioner for Human Rights.⁹³ Boeing’s JDAM kits have also been directly linked to unlawful air strikes on October 10 and 22 on civilian homes in the Gaza Strip, attacks that Amnesty International argues could amount to a war crime.⁹⁴

⁸⁶ United Nations Human Rights Council, “Human Rights in Palestine and Other Occupied Territories” (United Nations, September 25, 2009), <https://www2.ohchr.org/english/bodies/hrcouncil/docs/12session/A-HRC-12-48.pdf>.

⁸⁷ Amnesty International, “Israel/Gaza: Operation ‘Cast Lead’: 22 Days of Death and Destruction,” *Amnesty International*, August 10, 2021, <https://www.amnesty.org/en/documents/mde15/015/2009/en/>.

⁸⁸ Human Rights Watch, “‘I Lost Everything’: Israel’s Unlawful Destruction of Property During Operation Cast Lead,” May 13, 2010, <https://www.google.com/url?q=https://www.hrw.org/report/2010/05/13/i-lost-everything/israels-unlawful-destruction-property-during-operation-cast-lead&sa=D&source=docs&ust=1711903270231516&usq=AOvVaw2-W6iJJvI94cQqd4y7BdA>.

⁸⁹ Anthony Capaccio, “Boeing Sped 1,000 Smart Bombs to Israel After Hamas Attacks,” *Bloomberg*, October 10, 2023, <https://www.bloomberg.com/news/articles/2023-10-10/boeing-spaced-1-000-smart-bombs-to-israel-after-the-hamas-attacks>.

⁹⁰ Anthony Capaccio, “Boeing Accelerates Delivery of up to 1,800 GPS-Guidance Bomb Kits to Israel,” *Bloomberg*, October 18, 2023, <https://www.bloomberg.com/news/articles/2023-10-18/boeing-accelerates-delivery-of-up-to-1-800-gps-guidance-bomb-kits-to-israel>.

⁹¹ American Friends Service Committee, “Boeing Co,” AFSC Investigate, November 17, 2022, <https://investigate.afsc.org/company/boeing>.

⁹² Emma Graham-Harrison, Manisha Ganguly, and Elena Morresi, “Cratered Ground and Destroyed Lives: Piecing Together the Jabalia Camp Airstrike,” *The Guardian*, November 2, 2023, <https://www.theguardian.com/world/2023/nov/01/jabalia-camp-airstrike-gaza>.

⁹³ Al Jazeera, “UN Rights Office Says Israeli Attacks on Jabalia Could Be ‘War Crime,’” Al Jazeera, November 2, 2023, <https://www.aljazeera.com/news/2023/11/2/un-rights-office-says-israeli-attacks-on-jabalia-could-be-war-crime>.

⁹⁴ Amnesty International, “Israel/OPT: US-made Munitions Killed 43 Civilians in Two Documented Israeli Air Strikes in Gaza – New Investigation,” February 12, 2024, <https://www.amnesty.org/en/latest/news/2023/12/israel-opt-us-made-munitions-killed-43-civilians-in-two-documented-israeli-air-strikes-in-gaza-new-investigation/>.

Among other weapons systems supplied to the Israeli military by Boeing are F-15 fighter aircraft, one of the main warplanes used by the Israeli Air Force; KC-46 Pegasus military refueling and transport aircraft; and AH-64 Apache attack helicopters, equipped with Hellfire air-to-ground missiles. These weapons have repeatedly been used in assaults on Palestinian civilians, resulting in numerous civilian deaths and mass destruction of civilian homes, and have been used to destroy civilian infrastructure, including hospitals, schools, and water and electric systems.⁹⁵

Northrop Grumman supplies the Israeli military with various missile systems and other weapons and is responsible for developing and manufacturing component technologies for Israel's main weapons systems. It manufactures key components for the F-16 and F-35 fighter jets, which were used by the Israeli Air Force in assaults in the Gaza Strip in 2008-2009 and 2021. It also supplies the Longbow missile delivery system for the Israeli Air Force's Apache attack helicopters, which have been used repeatedly in major assaults on Gaza.⁹⁶ These technologies have resulted in numerous civilian deaths and destruction of civilian homes and infrastructure.

Northrop Grumman has also provided the Israeli Navy with S'ar 5 warships, heavily armed missile ships which have been used in the assault on Gaza.⁹⁷ On December 15, Northrop Grumman was awarded an \$8.9 million contract from the U.S. Department of Defense for 30mm MK44 Stretch cannons for the Israeli military. The Israeli Defense Force uses these guns on the Namer, an exceptionally armored personnel carrier which has been used extensively in Gaza.

L3 Harris Technologies manufactures components that are integrated into multiple weapons systems which have been used by the Israeli military in assaults on Palestinian civilians. This includes providing bomb rack units and explosive munition release systems for Lockheed Martin's F-35 combat planes, which are currently being used to bombard Gaza.^{98 99} F-35s were also among the 80 fighter jets deployed in airstrikes across the Gaza Strip during a month-long assault in 2021, resulting in hundreds of civilian deaths and thousands of injured civilians.¹⁰⁰ L3Harris also manufactures components for Boeing's JDAM kits, whose use has been directly connected to the current genocide in Gaza (see above). Parts manufactured by L3Harris are also

⁹⁵ American Friends Service Committee, "Boeing Co."

⁹⁶ American Friends Service Committee, "Northrop Grumman Corp," AFSC Investigate, November 14, 2022, <https://investigate.afsc.org/company/northrop-grumman>.

⁹⁷ AFSC Action Center for Corporate Accountability, "Companies Profiting 2023-2024 Attacks on Gaza," *American Friends Service Committee*, n.d., <https://afsc.org/companies-2023-attack-gaza>.

⁹⁸ Patrick Barlow, "Brighton Factory Parts Are in Type of F-35 Fighter Jets Used in Israel," *The Argus*, December 12, 2023, <https://www.theargus.co.uk/news/23982322.brighton-factory-parts-type-f-35-fighter-jets-used-israel/>.

⁹⁹ Harriet Sherwood, "Israel Pounds '250 Gaza Targets in a Day' as UN Chief Warns Order May Break Down," *The Guardian*, December 8, 2023, <https://www.theguardian.com/world/2023/dec/07/israel-pounds-250-gaza-targets-in-a-day-as-un-chief-warns-order-may-break-down>.

¹⁰⁰ American Friends Service Committee, "Lockheed Martin Corp."

integrated into the Sa'ar 5 and Sa'ar 6 warships, which are used by the Israeli Navy to enforce its naval blockade on the Gaza strip.¹⁰¹ This blockade contributes to Israel's control of Gaza's airspace, territorial waters, and most border crossing points, and has been used to enforce Israel's "total siege" banning admission of food, electricity and fuel to Gaza since October 2023.¹⁰² In addition, L3Harris supplies parts for Israel's Merkava battle tanks.¹⁰³

General Dynamics provides Israel with artillery ammunition and bombs for assaults on Gaza. It is the sole U.S. provider of 155mm caliber artillery shells, which have been used extensively in the ongoing genocide in Gaza and in previous Israeli assaults on Palestinian civilians. 155mm artillery shells are loaded with TNT and burst into 2,000 metal fragments upon impact, risking injury, death, and permanent disability to anyone within 300 meters of the blast. These munitions are unguided and have an "error radius" of approximately 25 meters, making their use highly indiscriminate and imprecise.¹⁰⁴ When deployed in densely populated areas, such as in the Gaza strip, they are bound to cause devastating harm to civilians, including widespread death and debilitation. According to Oxfam, "There are no known scenarios in which 155mm artillery shells could be used in Israel's ground operation in Gaza in compliance with international humanitarian law".¹⁰⁵

Israel has previously used 155mm artillery shells in Gaza in 2008-9 and 2014 to hit densely populated areas in Gaza including neighborhoods, hospitals, schools, shelters, and safe zones. In July 2014, for example, Israel used ten 155mm artillery shells to attack a United-Nations run school in Jabaliya, resulting in over 100 deaths and injuries. In the current assault on Gaza, it is estimated that by November 25, 2023, one Israeli brigade had already fired 10,000 of these shells.¹⁰⁶ In October 2023, a Pentagon official stated plans for the U.S. to send Israel an additional tens of thousands of 155mm artillery shells that were previously allocated for Ukraine,¹⁰⁷ a transfer opposed in a joint letter from over thirty organizations due to the grave risk posed to Palestinian civilians.¹⁰⁸ In addition, General Dynamics is also the sole U.S. supplier of

¹⁰¹ The Mapping Project, "L3Harris," 2022, <https://mapliberation.org/plain/entities/L3Harris.html>.

¹⁰² Al Jazeera, "Israel Announces 'Total' Blockade on Gaza," *Al Jazeera*, October 9, 2023, <https://www.aljazeera.com/news/2023/10/9/israel-announces-total-blockade-on-gaza>.

¹⁰³ AFSC Action Center for Corporate Accountability, "Companies Profiting 2023-2024 Attacks on Gaza."

¹⁰⁴ Robert Perkins, "Under Fire: Israel's Artillery Policies Scrutinised" (Action On Armed Violence (AOAV), December 2014), <https://aoav.org.uk/wp-content/uploads/2015/03/AOAV-Under-Fire-Israels-artillery-policies-scrutinised.pdf>.

¹⁰⁵ Oxfam America, "Artillery Shells Transfer: Oxfam Policy Brief," October 2023, https://webassets.oxfamamerica.org/media/documents/Artillery_Shells_Transfer_Policy_BriefingNote_1.pdf.

¹⁰⁶ AFSC Action Center for Corporate Accountability, "Companies Profiting 2023-2024 Attacks on Gaza."

¹⁰⁷ Barak Ravid, "Scoop: U.S. to Send Israel Artillery Shells Initially Destined for Ukraine," *Axios*, October 19, 2023, <https://www.axios.com/2023/10/19/us-israel-artillery-shells-ukraine-weapons-gaza>.

¹⁰⁸ Project On Middle East Democracy (POMED), "Joint Letter to Secretary of Defense Lloyd Austin Opposing 155mm Artillery Shell Transfer to Israel" Letter, November 13, 2023. <https://pomed.org/publication/joint-letter-to-secretary-of-defense-lloyd-austin-opposing-155mm-artillery-shell-transfer-to-israel/>.

the metal bodies of the MK-80 bomb series, the primary weapon type Israel uses to bomb Gaza, compatible with Boeing's JDAM kits.

General Electric Co designs and manufactures engines, electric power and mechanical systems, and components for weapons systems which have been repeatedly used by the Israeli military against Palestinian civilians. GE's engines are integrated into the F-15 and F-16 combat planes used extensively by the Israeli Air Force. F-16 fighter jets have been used in attacks on Palestinian civilians and civilian buildings in Israeli assaults in 2021 and 2008-2009.¹⁰⁹ GE also manufactures engines for Boeing's Apache helicopters,¹¹⁰ which were used in 2014 to kill dozens of Palestinian civilians and destroy civilian infrastructure in an assault identified as a war crime under international law by the UN High Commissioner for Human Rights.¹¹¹ GE also supplies a gas turbine that is integrated into Israel's Sa'ar 5 warship, used to enforce the Israeli Navy's blockade of the Gaza strip, and provides engines for helicopters manufactured by Lockheed Martin for Israel.

Textron Inc is a US-based military contractor which supplies the Israeli Air Force 100 Squadron with military aircraft. During Israel's 2014 large assault on Gaza, the Israeli Air Force 100 Squadron, which operates Textron aircraft, was in charge of spotting people leaving buildings after a "roof-knock."¹¹² This strategy has historically been used against Gazans, with the aim to murder innocent civilians by first "knocking" on their roof with explosives before bombarding their homes.¹¹³ Amnesty International affirmed that this method fails to provide proper warning to its victims and thereby violates international humanitarian law.¹¹⁴

Companies Upholding Israeli Apartheid

The following companies found in the endowment fund help enable the crime of apartheid by providing technology used in Israel's militarized checkpoints, borders, and surveillance systems, which contribute to enforcing racial segregation and discrimination against Palestinians.

¹⁰⁹ American Friends Service Committee, "General Electric Co," AFSC Investigate, December 9, 2022, <https://investigate.info/company/general-electric>.

¹¹⁰ AFSC Action Center for Corporate Accountability, "Companies Profiting 2023-2024 Attacks on Gaza."

¹¹¹ United Nations Human Rights Council, "Report of the detailed findings of the independent commission of inquiry established pursuant to Human Rights Council resolution S-21/1." June 23, 2015, <https://undocs.org/Home/Mobile?FinalSymbol=A%2FHRC%2F29%2FCRP.4>.

¹¹² American Friends Service Committee, "Textron Inc," *Investigate*, November 3, 2021, <https://investigate.afsc.org/company/textron>

¹¹³ Jerusalem (AFP), "'Roof knocking': Israel warning system under scrutiny in Gaza conflict," *France 24*, May 20, 2021, <https://www.france24.com/en/live-news/20210520-roof-knocking-israel-warning-system-under-scrutiny-in-gaza-conflict>

¹¹⁴ Amnesty International News, "Israel/Gaza: UN must impose arms embargo and mandate an international investigation as civilian death toll rises," *Amnesty International*, July 11, 2014, <https://www.amnesty.org/en/latest/news/2014/07/israelgaza-un-must-impose-arms-embargo-and-mandate-international-investigation-civilian-death-t/>

Motorola Solutions has been in close relations with the Israeli Apartheid state since 1964,¹¹⁵ supplying them with surveillance equipment that has been installed within Israel's illegal settlements in the West Bank,¹¹⁶ the apartheid wall and checkpoints in Gaza and the West Bank,¹¹⁷ and, lastly, within Israeli military bases. In 2005, after being awarded a contract by the Israeli Ministry of Defense, the company began providing them with a "virtual fence system" known as the MotoEagle Wide Area Surveillance System that is used within dozens of illegal settlements. This system, which is known to include radars and cameras that can detect movement outside of the settlements, was part of Israel's plan to prevent Palestinians from accessing areas around certain settlements, even if it was their private land.¹¹⁸ Besides suppressing Palestinians through surveillance, Motorola Solutions also provides the Israeli Ministry of Defense with a "fuzing systems house for the Israeli Air Force and major Israeli defense industries like IAI, IMI, and Rafael for a wide range of projects."¹¹⁹ One of these fuzing systems is the 980 Low Altitude Proximity Fuze, which "is intended to provide a proximity function for the MK-80 high explosive bombs series" that "increases weapon effectiveness dramatically against soft and light targets."¹²⁰ This specific fuzing system was used in the July 30, 2006 Israeli attack on Lebanon which killed 28 civilians¹²¹, most of which were children, as well as the 2009 attack on Gaza, which killed around 1400 Palestinians.¹²²

Amazon.com Inc is the largest provider of cloud computing for the Israeli government and military which supports prison and police surveillance.¹²³ Similarly, **Alphabet Inc** is one of the largest companies that owns subsidiaries like Google, Youtube, Fitbit, Nest, and Waymo. It also provides software and cloud services to the Israeli government and military. Both of these companies are working closely together to develop a new cloud infrastructure for use by the Israeli government named "Project Nimbus," which is "one of the largest technology projects in Israel's history."¹²⁴ This project is meant to serve all the branches of the Israeli government,

¹¹⁵ American Friends Service Committee, "Motorola Solutions Inc," AFSC Investigate, March 4, 2021, <https://investigate.afsc.org/company/motorola-solns>.

¹¹⁶ United Nations, "Israel's Settlements Have No Legal Validity, Constitute Flagrant Violation of International Law, Security Council Reaffirms," Press release, December 23, 2016, <https://press.un.org/en/2016/sc12657.doc.htm>.

¹¹⁷ American Friends Service Committee, "Wall and Checkpoints in Palestine," AFSC Investigate, n.d., <https://investigate.afsc.org/tags/wall-and-checkpoints-palestine>.

¹¹⁸ Who Profits Research Center, "Motorola Solutions," Who Profits, December 1, 2023, <https://www.whoprofits.org/companies/company/3808?motorola-solutions>.

¹¹⁹ SIBAT Israel Ministry of Defense, "Motorola," Data set, *Israel Defense Sales Directory*, n.d., <http://www.inminds.com/img/motorola.2009-08-13.3.png>.

¹²⁰ Motorola Israel Ltd, "Government Electronics Department (GED)," 2008, <https://archive.adalahny.org/sites/default/files/resources/08-01/motorola-israel-ltd-government-electronics-department-ged/sod-motorola-ged.pdf>.

¹²¹ Innovative Minds, "Boycott Israel Campaign - Boycott Motorola", 2007, <http://www.inminds.com/boycott-motorola.php#r13>.

¹²² Amnesty International, "Israel/Gaza: Operation 'Cast Lead' - 22 Days of Death and Destruction Facts and Figures", July 2 2009, <https://www.amnesty.org/en/wp-content/uploads/2021/07/mde150212009eng.pdf>.

¹²³ American Friends Service Committee, "Amazon.Com Inc." AFSC Investigate, October 5, 2021, <https://investigate.afsc.org/company/amazon>.

¹²⁴ American Friends Service Committee, "Alphabet Inc." AFSC Investigate, September 24, 2021, <https://investigate.afsc.org/company/alphabet>.

including the Israeli military, which played a leading role in its establishment; the Israeli police; Israel's prison system; land authority; and other government entities that administer Israel's apartheid state and its persecution of Palestinians. Considering the scale of the Nimbus project, it is expected that it will also directly serve Israel's illegal settlements within the occupied West Bank and Golan Heights. Both Google and Amazon workers have come out against the Nimbus project due to its clear suppression of Palestinian rights and continued use in enforcing the apartheid system within Israel, claiming that it "will make the systematic discrimination and displacement carried out by the Israeli military and government even crueler and deadlier for Palestinians."¹²⁵ The technology within the \$1.2 billion Nimbus project allows for the surveillance and unlawful data collection of Palestinians as well as facilitates the expansion of Israel's illegal settlements, all of which will result in denying Palestinians their basic rights, forcing them out of their homes, and perpetuating continuous genocide of Palestinians within the Gaza Strip.

Tata Motors is an Indian multinational automobile manufacturer that supplies Land Rovers to the Israeli Military to use within the occupied Palestinian Territories. Once the Land Rover is received by the Israeli military, MDT Armor, an Israeli company, converts it into the MDT David, which is an armored vehicle that has become a standard patrol and intelligence-gathering vehicle for the military operations within the occupied West Bank and Gaza Strip.¹²⁶ The MDT David vehicle is used to protect illegal settlements and military bases within the occupied West Bank, prevent Palestinian villagers from working their land, and suppress Palestinian demonstrators. This vehicle is also equipped with tear gas launchers that have been used in Nabi Saleh, a Palestinian village in the occupied West Bank, as well as during Operation Protective Edge, the Israeli military assault in Gaza in 2014, which killed 2,251 Palestinians.¹²⁷ During the currently genocide in Gaza, the Palestine Red Crescent Society posted a photo showing two MDT David vehicles that were used to block an ambulance carrying a wounded Palestinian in the Tulkaram Refugee Camp.¹²⁸ On the same day, the MDT David vehicle was used to attack a Palestinian youth at the Zaatara military checkpoint in the occupied West Bank city of Nablus.¹²⁹ Since the beginning of the genocide in October 2023, Israel has received and rushed at least one

¹²⁵The Guardian, "We Are Google and Amazon Workers. We Condemn Project Nimbus | Anonymous Google and Amazon Workers," The Guardian, October 12, 2021, <https://www.theguardian.com/commentisfree/2021/oct/12/google-amazon-workers-condemn-project-nimbus-israeli-military-contract>.

¹²⁶ American Friends Service Committee, "Tata Motors LTD," AFSC Investigate, August 3, 2022, <https://investigate.afsc.org/company/tata-motors>.

¹²⁷ UNRWA, "2014 Gaza Conflict," n.d., <https://www.unrwa.org/2014-gaza-conflict>.

¹²⁸ Palestinian Red Cross, "Continuous attacks by the IOF against our Staff in the field. Today in Tulkarm camp where an ambulance was surrounded, inspected, and a wounded person inside was detained. Infrastructure around the camp was also destroyed, making it difficult for ambulances to reach," *Twitter*, November 14, 2023, <https://twitter.com/PalestineRCS/status/1724403354225230110>.

¹²⁹ Eye on Palestine, "An Israeli jeep hit a car of a Palestinian youth today at Zaatara military checkpoint near Nablus, causing the jeep itself to flip over. The Israeli soldiers subsequently arrested the Palestinian man.," *Instagram*, November 14, 2023, <https://www.instagram.com/reel/CzokShLKejy/?igshid=YzE4YTliZjNlMA%3D%3D>.

shipment of David vehicles from the United States to supplement the Israel Occupation Force's operational capabilities and revamp and modernize their vehicle fleet.¹³⁰

Tata Consultancy Services Limited (TCS) is an Indian multinational information technology services and consulting company headquartered in Mumbai.¹³¹ On April 20th 2023, TCS hosted Israel's Minister of Economy and Industry in a meeting centered around strengthening the cooperation between Israel's government bodies and TCS, including through support of the aforementioned Palestinian surveillance project, Project Nimbus.¹³²

General Motors is a US vehicle manufacturer that provides commercial and specialized vehicles to Israeli occupation authorities.¹³³ According to Who Profits, Chevrolet Grumman vans have been used as mobile baggage scanning vehicles in several military checkpoints in the occupied West Bank¹³⁴, a system that imposes travel restrictions on upwards of 70,000 Palestinians laborers daily forced to cross Israeli checkpoints.¹³⁵ Additionally, General Motors' Chevrolet Savana and Chevrolet Malibu vehicles are used in the Israel Prison Service, a facet of apartheid where Palestinians face a disproportionate 99% conviction rate.¹³⁶

Ford Motor Co provides commercial and specialized vehicles to Israeli occupation authorities.¹³⁷ According to Who Profits, Ford vehicles have been repeatedly used by the Israeli military and police to maintain the military occupation of the West Bank and blockade of the Gaza Strip.¹³⁸ This includes various shipments of Ford armored vehicles in 2022-2023 used in

¹³⁰ Admin, "Israel Defense Forces Receives Initial Shipment of David 4x4 Light Armored Vehicles," *Military Leak*, December 22, 2023, <https://militaryleak.com/2023/10/22/israel-defense-forces-receives-initial-shipment-of-david-4x4-light-armored-vehicles/>.

¹³¹ Forbes, "Tata Consultancy Services | Company Overview & News," Forbes, n.d., <https://www.forbes.com/companies/tata-consultancy-services/>.

¹³² Tata Consultancy Services, "TCS Expands in Israel's Public Sector: Hosts Minister of Economy at Mumbai Campus" Press Release, n.d., <https://www.tcs.com/who-we-are/newsroom/press-release/tcs-expands-in-israels-public-sector-hosts-minister-of-economy-at-mumbai-campus>.

¹³³ American Friends Service Committee, "General Motors Co," AFSC Investigate, February 21, 2022, <https://investigate.afsc.org/company/general-motors>

¹³⁴ Who Profits Research Center, "General Motors Company," *Who Profits*, <https://www.whoprofits.org/companies/company/3959?general-motors-company#>

¹³⁵ Activestills, "Israel's military checkpoints: 'We live a life of injustice,'" *Al Jazeera*, <https://interactive.aljazeera.com/aje/2018/commuting-through-israeli-checkpoints/index.html>

¹³⁶ Motamedi, Maziar. "Jailed without charge: How Israel holds thousands of Palestinian prisoners," *Al Jazeera*, November 29, 2023, <https://www.aljazeera.com/news/2023/11/29/jailed-without-charge-how-israel-holds-thousands-of-palestinian-prisoners#:~:text=Traffic%20violations%20or%20being%20in,in%20civilian%20courts%20inside%20Israel>

¹³⁷ American Friends Service Committee, "Ford Motor Co," AFSC Investigate, February 10, 2022, <https://investigate.afsc.org/company/ford-motor>

¹³⁸ Who Profits Research Center, "Ford Motor Company," *Who Profits*, December 28, 2023, <https://www.whoprofits.org/companies/company/3658?ford-motor-company>.

raids across the West Bank.¹³⁹ Ford has also sold their F-350 trucks to the special Israeli police unit Yoav, which participates in the forcible displacement of Palestinian Bedouin communities in the Negev.¹⁴⁰

Companies Involved in the Settler Colonization of Palestine and its People

The following companies in the endowment fund facilitate ongoing settler colonial violence against Palestine and its people by profiting from the demolition of Palestinian communities, extraction of resources from Palestinian territory, and construction of illegal Israeli settlements on Palestinian land.

Caterpillar is a US-based multinational manufacturer of construction machinery and equipment. Its products are weaponized for the Israeli military and are used in home demolitions; in the construction of illegal settlement infrastructure, border walls, and military checkpoints; and in military assaults against Palestinians.¹⁴¹ Caterpillar is notorious for their Israeli Armored CAT D9, an armored bulldozer nefariously nicknamed the “Teddy Bear”. It is used to injure Palestinians who try to prevent the Israeli army from demolishing their homes to build Israeli settlements. In 2003, the Israeli army murdered American college student and activist Rachel Corrie with the “Teddy Bear” as she tried to help a Palestinian family facing house demolition.¹⁴² Beyond these weaponized assaults, the Israeli military has used the D9 to systematically “raze Palestinian homes, destroy agriculture and shred roads in violation of the laws of war,” according to Human Rights Watch.¹⁴³

Chevron is one of the world's largest oil and gas companies and is a major exporter to Israel at the cost of Palestine’s right to their natural resources. Its subsidiaries Chevron Mediterranean Limited, NewMed Energy, and Ratio Energies extracts gas off the shores of the Gaza Strip.¹⁴⁴ Amidst the ongoing genocide, Chevron provided a \$24 million investment to the “Tamar” natural gas field off the coast of Occupied Palestine. This gas field was secured by the Israeli Navy by restricting all shipping in the area—tightening the naval blockade on Gaza to 3–6 nautical

¹³⁹ Emanuel Fabian, “Amid Gaza War, IDF Steps up West Bank Raids to Quell Potential Additional Front,” *The Times of Israel*, November 29, 2023,

<https://www.timesofisrael.com/amid-gaza-war-idf-steps-up-west-bank-raids-to-quell-potential-additional-front/>
¹⁴⁰ Ilana Curiel, “Special Police Unit Evacuates Bedouins; ‘it’s Not Easy,’ Officer Says,” *Ynetnews*, October 25, 2013, <https://www.ynetnews.com/articles/0,7340,L-4445428,00.html>.

¹⁴¹ American Friends Service Committee, “Caterpillar Inc.,” *AFSC Investigate*, September 12, 2022, <https://investigate.afsc.org/company/caterpillar>.

¹⁴² Harriet Sherwood, “Rachel Corrie Death: Struggle for Justice Culminates in Israeli Court,” *The Guardian*, December 1, 2017, <https://www.theguardian.com/world/2012/aug/27/rachel-corrie-death-israel-verdict>.

¹⁴³ Human Rights Watch, “Israel: Caterpillar Should Suspend Bulldozer Sales: Weaponized Bulldozers Used to Destroy Civilian Property and Infrastructure,” October 28, 2020, <https://www.hrw.org/news/2004/11/21/israel-caterpillar-should-suspend-bulldozer-sales>.

¹⁴⁴ Chevron Policy, Government and Public Affairs, “Our Projects in Israel,” *chevron.com*, n.d., <https://israel.chevron.com/en/our-businesses>.

miles—with devastating impacts on Gaza’s economy and fishing industry,¹⁴⁵ as well as being used to deprive Palestinians of electricity during the ongoing genocide.¹⁴⁶

Cemex is a Mexican multinational building materials company that owns the Israeli company Readymix Industries,¹⁴⁷ which has provided concrete elements for construction of Israeli settlements in the occupied West Bank. After great international pressure from investors and activist groups over its operations in occupied Palestine, Cemex conducted a human rights risk assessment and announced a new policy of not supplying construction materials to Israel's "illegal settlements." The company, however, adopted Israel's legal definition of what counts as a "legal" settlement¹⁴⁸, contrary to international consensus that has long recognized that Israeli settlements are illegal under international law.¹⁴⁹

2. Responsibility of Tel Aviv University as Addressed in Demand (2)

[Section II \(2\)](#) and [Section IV: B\(2\)](#) of this document have already touched upon many of the ways in which TAU has a significant shared responsibility for the concerns identified in this letter, namely the perpetration of illegal and immoral apartheid and genocide of the Palestinian people by the state of Israel. Yet in addition to these connections, TAU’s participation in the oppression of the Palestinian people extends further in several directions, which we elaborate upon here.

TAU’s Exploitation of Palestinian Land and Bodies

For one, TAU’s historical and ongoing exploitation of Palestinian land and bodies is part and parcel of Israel’s occupation of Palestine. The university itself is located on the ground of a destroyed Palestinian village, Al-Shaykh Muwannis, which was taken during the 1948 Nakba that displaced more than 700,000 Palestinians and killed some 15,000. The university has never publicly acknowledged this fact, and at least some of the land TAU sits upon appears to have been stolen rather than purchased from its original Palestinian owners.¹⁵⁰ Moreover, as [Section](#)

¹⁴⁵ Action Center for Corporate Accountability, “Chevron Fuels Israeli Apartheid and War Crimes,” American Friends Service Committee, March 2024, <https://afsc.org/chevron-fuels-israeli-apartheid-and-war-crimes>.

¹⁴⁶ Syed Sadain Gardazi, “Israel Halts Oil Production at Tamar Gas Field, Gaza Under ‘Total Blockade,’” *Forbes ME*, October 9, 2023, <https://www.forbesmiddleeast.com/industry/energy/airstrikes-complete-siege-declaration-of-war-heres-how-the-israel-hamas-conflict-is-unfolding>.

¹⁴⁷ Who Profits Research Center, “Readymix Industries Israel,” *Who Profits*, August 1, 2023, <https://www.whoprofits.org/companies/company/3778?readymix-industries-israel-ltd-group>.

¹⁴⁸ CEMEX, “Cemex Response (Unofficial Translation by Business & Human Rights Resource Centre),” *Business & Human Rights Resource Centre*, September 7, 2015, <https://www.business-humanrights.org/en/latest-news/cemex-response-unofficial-translation-by-business-human-rights-resource-centre/>.

¹⁴⁹ Amnesty International, “Chapter 3: Israeli Settlements and International Law,” *Amnesty International*, July 29, 2021, <https://www.amnesty.org/en/latest/campaigns/2019/01/chapter-3-israeli-settlements-and-international-law/>.

¹⁵⁰ Uri Yacobi Keller, *Academic Boycott of Israel: And The Complicity of Israeli Academic Institutions in Occupation of Palestinian Territories*, E-Book (Alternative Information Center (AIC), 2009), <https://bdsmovement.net/files/2011/02/EOO23-24-Web.pdf>.

[IV: B\(2\)](#) explains, the Greenberg Forensic Institute in TAU's Sackler School of Medicine extends this history of theft and occupation through its refusal to return the bodies of dead Palestinians against the wishes of their families and loved ones. In another example, TAU has also partnered with Elad, an organization directly responsible for illegal Israeli settlements on Palestinian land, for archeological digs.¹⁵¹

TAU's Close Ties with the Israeli Military

Second, Israeli universities in general, and TAU in particular, play a critical role in supporting the Israeli military. When Israel's military abilities waned in the 1970s, military officials realized it needed a way to supply the IDF with more research and development for the manufacture of new weapons. These priorities brought university education and its students into alignment with Israel's military goals, with universities serving as pipelines for IDF recruitment and leadership and scientific research and development resources being directed explicitly for military and arms advancement. All universities in Israel, including TAU, receive the majority of their income through IDF training and research funding.¹⁵² Military research and development is centralized in Israeli universities, where these scientific investigations are then developed by the defense industries and the army. TAU's Department of Engineering ties with Elbit Systems, Israel's largest weapons manufacturer, are described in detail in Section II (2). The University also facilitates the recruitment of its students to these military technology corporations, such as Elbit Systems.

In 2022, TAU established the Elmrom Center, a joint venture in collaboration with the Israeli Air Force.¹⁵³ This collaboration serves to enhance research into air and space combat and, crucially, exists to use such scientific innovation for the benefit of the Air Force. The Elmrom Center is headed by Eviatar Matania, who was the former founding Head of the Israel National Cyber Bureau (INCB) and currently Head of the International Cyber Politics & Government Program at TAU. The INCB is a significant arm of the Israeli government that uses academic-industry-military collaborations to develop Israeli's capacities in cyber-warfare, something Prime Minister Netanyahu has equated to being Israeli's "digital Iron Dome".¹⁵⁴ The Center is stated to support developments in the adaptation of the Air Force's operational concepts, combat doctrines, military knowledge, and power-building processes. Israel's Air Force plays a significant role in the continued occupation, terrorization, maiming, and murder of Palestinians. As the most advanced air defense in the world, Israel regularly uses remotely

¹⁵¹ Ben White, "Tel Aviv University's Role in Settler-run Archaeological Dig "Playing playing into hands of BDS," Israeli academics complain" *The Electronic Intifada*, December 27, 2012. <https://electronicintifada.net/blogs/ben-white/tel-aviv-universitys-role-settler-run-archaeological-dig-playing-hands-bds-israeli>.

¹⁵² Nick Riemer, "Universities as Tools of Apartheid," *Overland Literary Journal*, May 29, 2023. <https://overland.org.au/2023/05/universities-as-tools-of-apartheid/>.

¹⁵³ Tel Aviv University, "For the 1st Time at an Israeli University: Air and Space Power Center," January 4, 2023, <https://taustrust.org/for-the-1st-time-at-an-israeli-university-air-and-space-power-center/>.

¹⁵⁴ Jason Gewirtz, "Inside the IDF's Super-Secret Elite Brain Trust," *The Tower*, April 2016, <https://www.thetower.org/article/inside-the-idfs-super-secret-elite-brain-trust-talpiot/>.

piloted aircrafts, F-25 fighter squadrons, and missiles to launch attacks on the Palestinian peoples below. This partnership represents a material way in which TAU is directly complicit in the development of future weapons explicitly designed to wreak havoc and violence upon the Palestinian people.

Further examples of the intimate relationship between TAU and the Israeli state and military apparatus include TAU's special engineering program for IDF soldiers to enhance scientific knowledge and academic skills. In addition, the Moshe Dayan Center (MDC) at TAU is yet another example of TAU's involvement in streamlining Israel's military intelligence which is directly translated into attacks on the Palestinian peoples. These examples showcase the ways in which Israeli universities benefit the interests of the Israeli state and military and arms industry, developing tactics, technologies, and intelligence that lead to the enforcement of undue force, punishment, and unparalleled levels of damage on Palestinian land, infrastructure, and people.

TAU's Role in Israeli National Security Policy

Finally, TAU shares responsibility in Israel's genocide, apartheid, and settler colonial violence against Palestinians not only through its support of the state's military efforts but also through its contributions to the ideological infrastructure upholding it. The Institute of National Security Studies (INSS) hosted by TAU aims to shape Israeli national security policy, emphasizing doctrines and military tactics.¹⁵⁵ Notably, the Institute has promoted the "Dahiya Doctrine," which has been used to devastating effect in Lebanon and Gaza and resulted in disproportionate retaliation and destruction of human life.¹⁵⁶ Indeed, Israel's policy of disproportionate retaliation and destruction is exactly what we witness unfolding in the genocide in Gaza today, through the indiscriminate mass murder of Palestinian civilians whose only transgression was existence.

The degree to which TAU is directly complicit in ongoing violence and destruction in Gaza cannot be overstated. Given the indisputable fact that Palestinians are the targets of IDF military operation and technology, Israel's innumerable university ties with the IDF and military and arms industry directly translate to fueling such violence against Palestinian peoples. These close ties directly and materially manifest in the maiming, murder, and terrorization of Palestinians. By partnering with TAU, Rutgers not only gives TAU material support, but also, by association, effectively condones Israel's massive security state and military and arms industry.

¹⁵⁵ Yaniv Cogan. "Academia, Weapons and Occupation: How Tel Aviv University Serves The." BDS Movement, May 4, 2022.

<https://bdsmovement.net/news/academia-weapons-and-occupation-how-tel-aviv-university-serves-interests-israeli-military-and>.

¹⁵⁶ Nick Riemer, "Universities as Tools of Apartheid," Overland Literary Journal, May 29, 2023, <https://overland.org.au/2023/05/universities-as-tools-of-apartheid/>.

D. Consensus of the University Community

As the fourth and final criteria for evaluating divestment requests, as specified in University Policy 40.2.14, is whether “[t]he concern reflects the consensus of the University community”, in this section we provide evidence of the clear and resounding support from the University community for the demands set forth in this request.

1. Support from Student, Faculty, Alumni, and Community Organizing Partners

A petition organized by the Endowment Justice Collective (EJC) allowing respondents to express their support for the demands listed in this document has garnered over 1,700 signatories from Rutgers students, faculty, staff, alumni, and members of the broader New Jersey community. At the time of writing, this list includes 993 students, 276 alumni, 34 faculty members, 18 staff members, 330 New Jersey taxpayers, and 168 members of the broader New Brunswick, Newark, and Camden communities. Moreover, 73 campus and community organizations, representing the broad support of their constituencies, have signed on to this document in solidarity. These figures are indicative of a vast and powerful degree of consensus among the University community in support of EJC’s demands. While too long to include here in its entirety, the full list of individuals who have endorsed this divestment request can be found in Appendix C. Below are the 73 campus organizations and community organizations who have endorsed EJC’s demands.

Rutgers Organizing Partners:

Al Ghazali Club
 Amnesty International (Rutgers)
 Anakbayan Rutgers
 Arab Cultural Club
 Bengali Students Association
 BIPOC MGSA
 Bloustein Palestine Solidarity
 Douglass Black Students Congress
 Edward J. Bloustein School of Planning and Public Policy
 Graduate Geographers Project
 Korean Language Club
 Lambda Theta Phi Latin Fraternity Inc.
 Latino Student Council
 Le Moyne College's El Progreso
 LLEGO: The LGBTQIA People of Color Org
 MAPS NEWARK
 Muslim Feminists for the Arts
 Muslim Public Relations Council
 NJMS4Palestine

Pakistani Student Association
Queer and Asian
Queer Caucus
Queer Student Alliance of Rutgers University
RSDM
RU Fusion
RU Indigenous
RU Neolyora
RU Swift Society
RU Tech and Unity
RU-N 4 The Arts
RU4Palestine
RUProgressive
Rutgers Alumni for Justice In Palestine
Rutgers Anti Zionist Minyan
Rutgers ASL Club
Rutgers Club Lacrosse
Rutgers Endowment Justice Collective
Rutgers Faculty for Justice in Palestine
Rutgers Linguistics Club
Rutgers Marxists
Rutgers Muslim Student Association
Rutgers Newark Muslim Law Student Association
Rutgers Nightshade
Rutgers Rainbow Symphony
Rutgers Students for Environmental Awareness
Rutgers Staff United
Rutgers Students for Justice in Palestine
Rutgers Undergraduate Anthropology Club
Rutgers Women's Gaming League
Rutgers-Newark Creative Writing Club
Sociedad Estudiantil Dominicana
Student Government Association
Thaakat Foundation
The Art History Student Association
The Examiner: Pre-health Journal
UltraViolet
WEN
Women's, Gender, and Sexuality Studies Graduate Student Organization
Young Communist of the Diaspora

Community Organizing Partners

Division of Law
 Do Good Donuts
 Drew University Students of Justice for Palestine
 Hope City Socialists
 Jewish Voice for Peace - Central New Jersey
 Jewish Voice for Peace Northern NJ
 Jewish Voices for Peace
 KAUST/CreativAI
 Luxevo Vacation
 Mobilization4Mumia
 Modest Tea Boutique
 Palestinian American Community Center
 Soma Green Party
 Stevens Amnesty International
 The Muslim Network

2. Faculty for Justice in Palestine Statement in Support of Endowment Justice Collective Divestment Call

Rutgers Faculty for Justice in Palestine (FJP) is a democratic collective, across disciplines and all three Rutgers campuses, that supports Palestinian liberation from 75 years of systemic Israeli racism, dispossession, dehumanization, and brutality.¹⁵⁷

Rutgers' financial investment and institutional partnerships make the university complicit with this regime of oppression, leading FJP to join the Endowment Justice Collective (EJC) in demanding:

1. Divestment from any firm or corporation materially participating in, benefitting from, or otherwise supporting the state of Israel's settler colonialism, apartheid, and genocide of Palestine and the Palestinian people, in accordance with the principles for divestment listed in university policy 40.2.14.
2. Termination of Rutgers' partnership with Tel Aviv University, including in the New Jersey Innovation and Technology Hub.

These demands are consistent with the Palestinian-led Boycott, Divestment, and Sanctions (BDS) movement against apartheid Israel, which FJP fully supports and which calls for freedom,

¹⁵⁷ Farah Najjar, "'The Continuous Nakba': Palestinians Decry Perpetual Suffering," Al Jazeera, May 15, 2023, <https://www.aljazeera.com/news/2023/5/15/the-continuous-nakba-palestinians-and-perpetual-suffering>.

justice and equality for Palestinians throughout historic Palestine, including Palestinian refugee right of return.¹⁵⁸

They are also consistent with Rutgers' history of ethical divestment campaigns; in 1977, Rutgers voted to partially divest from apartheid South Africa, and then agreed to full divestment in 1985.¹⁵⁹ This legacy of divestment against racial colonialism sets a strong precedent for divestment actions demanding freedom and liberation for Palestine.

Context

The seventeen-year siege of and war on Gaza is part of a longstanding effort to isolate, dehumanize, and collectively punish Palestinians for resisting decades of occupation and what the United Nations Economic and Social Commission for Western Asia,¹⁶⁰ Human Rights Watch,¹⁶¹ Amnesty International,¹⁶² and the Israeli human rights organization B'tselem has called an Israeli Apartheid regime.¹⁶³ That siege has now culminated in what the International Court of Justice has said may "plausibly" be genocide.¹⁶⁴ We understand the struggle for Palestinian freedom to be aligned with anti-colonial and anti-racist movements across the world. The current Israeli assault on Gaza makes this struggle all the more urgent.

Faculty expertise

Our demands collectively arise from our position as a group that includes faculty with scholarly expertise in academic fields that have a long tradition of identifying and working against persistent, systemic and egregious violations of human rights of the kind that the state of Israel is engaged in. These fields include international humanitarian law, comparative genocide studies, nationalism, apartheid, racism, colonialism, and settler colonialism. Our scholarly work recognizes the way that colonial and anti-democratic regimes maintain themselves through policies of apartheid, ethnic cleansing, economic exploitation, and genocide, buttressed by ideologies of religious nationalism and racism. Our scholarship leads us to identify Israel as a

¹⁵⁸ "What Is BDS?," BDS Movement, December 20, 2023, <https://bdsmovement.net/what-is-bds>.

¹⁵⁹ "Anti-Apartheid Activism at Rutgers," Omeka RSS, accessed March 30, 2024, <https://scarletandblack.rutgers.edu/archive/collections/show/27>.

¹⁶⁰ "ESCWA Launches Report on Israeli Practices towards the Palestinian People and the Question of Apartheid," United Nations Economic and Social Commission for Western Asia, December 2, 2020, <https://www.unescwa.org/news/escwa-launches-report-israeli-practices-towards-palestinian-people-and-question-apartheid>.

¹⁶¹ Omar Shakir, "A Threshold Crossed," Human Rights Watch, March 28, 2023, <https://www.hrw.org/report/2021/04/27/threshold-crossed/israeli-authorities-and-crimes-apartheid-and-persecution>.

¹⁶² "Israel's Apartheid against Palestinians," Amnesty International, June 23, 2023, <https://www.amnesty.org/en/latest/campaigns/2022/02/israels-system-of-apartheid/>.

¹⁶³ "A regime of Jewish supremacy from the Jordan River to the Mediterranean Sea: This is apartheid," B'tselem, January 12, 2021, https://www.btselem.org/publications/fulltext/202101_this_is_apartheid.

¹⁶⁴ "Gaza: ICJ Ruling Offers Hope for Protection of Civilians Enduring Apocalyptic Conditions, Say UN Experts," United Nations Office of the High Commissioner for Human Rights, January 31, 2024, <https://www.ohchr.org/en/press-releases/2024/01/gaza-icj-ruling-offers-hope-protection-civilians-enduring-apocalyptic>.

settler-colonial state maintained through racial policies of segregation and ethnic cleansing, to analyze its historical parallels in geographies including apartheid South Africa and North America, and to speak up against such regimes wherever they arise. As such, we cannot tolerate that the institution to which we devote our working lives is complicit in the very evils we critique in our scholarship.

Environment of repression

We speak out against what is happening despite the campaign to silence campus Pro-Palestine advocacy all over the country, including at Rutgers, by slandering it as antisemitic.¹⁶⁵ The vast majority of retaliation against students and faculty engaging in peaceful protest has been based on what is considered protected speech and advocacy. At Rutgers, not only was SJP banned in a thinly veiled attack on constitutionally protected free speech, but the University has also not spoken up against the smear campaign launched by right-wing government officials against the University's Center for Security, Race, and Rights.¹⁶⁶ This is worrying not only because it makes the university complicit in the Islamophobic campaign to normalize the assault on civilians in Gaza but also because it aligns the Rutgers Administration with the right wing's growing attacks on free speech and higher education, including assaults on Critical Race Theory, gender studies, and adjacent disciplines.¹⁶⁷

Scholasticide/Educide

We demand Rutgers' divestment from Israel in solidarity with our colleagues in Palestine, who in the past months have endured Israel's systematic destruction of education in Gaza. In the past four months, all of Gaza's 12 universities have been bombed and mostly destroyed.¹⁶⁸ Approximately 378 schools have been destroyed or damaged.¹⁶⁹ The Palestinian Ministry of Education has reported the deaths of over 4,327 students, 231 teachers¹⁷⁰ and 94 professors¹⁷¹.

¹⁶⁵ "Presumptively Antisemitic: Islamophobic Tropes in the Palestine-Israel Discourse," Rutgers Center for Security, Race and Rights, March 29, 2024, <https://csrr.rutgers.edu/issues/presumptively-antisemitic/>.

¹⁶⁶ "Senate Judiciary Committee Republicans Probe Rutgers University Center That Promotes Terrorist Sympathizers and Anti-Semitism," United States Senate Committee on the Judiciary, February 7, 2024, <https://www.judiciary.senate.gov/press/rep/releases/senate-judiciary-committee-republicans-probe-rutgers-university-center-that-promotes-terrorist-sympathizers-and-anti-semitism>.

¹⁶⁷ Rashawn Ray and Alexandra Gibbons, "Why Are States Banning Critical Race Theory?," Brookings, January 23, 2024, <https://www.brookings.edu/articles/why-are-states-banning-critical-race-theory/>.

¹⁶⁸ Al Jazeera, "How Israel Has Destroyed Gaza's Schools and Universities," Al Jazeera, January 24, 2024, <https://www.aljazeera.com/news/2024/1/24/how-israel-has-destroyed-gazas-schools-and-universities#:~:text=Pal estinian%20news%20agency%20Wafa%20reported,university%20in%20Gaza%20in%20stages>.

¹⁶⁹ "Hostilities in the Gaza Strip and Israel | Flash Update #102 [EN/AR/HE]," ReliefWeb, January 26, 2024, <https://reliefweb.int/report/occupied-palestinian-territory/hostilities-gaza-strip-and-israel-flash-update-102-enarhe>.

¹⁷⁰ UNICEF, UNICEF in the State of Palestine Escalation Humanitarian Situation Report No. 15, January 2024, [https://www.unicef.org/media/151126/file/State-of-Palestine-Humanitarian-Situation-Report-No.15-\(Escalation\)-17-January-2024.pdf](https://www.unicef.org/media/151126/file/State-of-Palestine-Humanitarian-Situation-Report-No.15-(Escalation)-17-January-2024.pdf).

¹⁷¹ Euro-Med Human Rights Monitor, "Israel Kills Dozens of Academics, Destroys Every University in the Gaza Strip," Press release, January 20, 2024, <https://euromedmonitor.org/en/article/6108/Israel-kills-dozens-of-academics,-destroys-every-university-in-the-Gaza-Strip>.

Numerous cultural heritage sites, including libraries, archives and museums, have also been destroyed, damaged and plundered.¹⁷² This is part of a years' long trend of Israel's targeting of Palestinian intellectual and cultural life, amounting to 'cultural genocide.' Not divesting makes us complicit in Israeli scholasticide, comprised of the above acts, which entail the systematic destruction, in whole or in part, of the educational life of a national, ethnic, racial or religious group.¹⁷³ We cannot stay silent as our collective mission as educators towards a better world for everyone in it is bombed out of existence in Gaza.

¹⁷² "Israeli Damage to Archives, Libraries, and Museums in Gaza, October 2023–January 2024," Librarians and Archivists with Palestine, accessed March 30, 2024,

¹⁷³ Librarians and Archivists with Palestine, "Israeli Damage to Archives, Libraries, and Museums in Gaza, October 2023–January 2024," February 1, 2024, <https://librarianswithpalestine.org/gaza-report-2024/?fbclid=IwAR1VqwE8t9HEb46IFQDPJh18ZFRreHyyzgCAXjPfMPIGoThfbSXBesy-Trog>.

V. Towards a Just Endowment

While our demands in this request are, in the short term, driven by the need to end Rutgers' complicity in Israel's crimes against humanity, we also set forth this document in service of a broader vision for a more just endowment that extends beyond the current crisis. Divestment from Israel can and ought to serve as the University's first step towards a strategy for managing its endowment fund that meaningfully engages the voices of its community members and directs the University's considerable resources towards the support of sustainable and collective wellbeing.

As tuition-paying students and members of the Rutgers community, we are represented by and therefore should have a say in the impact created by investments made through our public university's endowment fund. We call on the JCOI, Board of Governors, and Board of Trustees to implement a space for this representation via two actions: first, through the amendment of Rutgers Investment Policy Appendix B with charge S-2206 "Socially Responsible Investment" to "create a reinvestment committee to amend the investment policy to consider, include, and publish geographically targeted environmental, social, and governance metrics in all aspects of investment decisions and policy,"¹⁷⁴ and all other measures proposed by said charge; and second, through democratic representation in ad hoc committees created to advise the JCOI in considering all current and future divestment requests, with the present request demanding the termination of all endowment and University connections to companies or entities complicit in the ongoing genocide of the Palestinian people.

Moreover, should the JCOI adopt a measure for socially responsible divestment and form an ad-hoc advisory committee similar to the one created in response to the 2021 decision to divest from fossil fuels, we demand equal and substantive representation within this committee for students, faculty, community members, and alumni in the broader University community. More specifically, this must include persons from Rutgers' Palestinian community and those affected by the genocide of Gaza including but not limited to members of the Endowment Justice Collective (EJC) and Students for Justice in Palestine (SJP).

Through this more democratic and collective approach to governance of the endowment fund, we envision a fund management strategy that prioritizes community wellbeing as a key metric in investment decisions. One version of what this might look like is for the University to direct its endowment fund toward community impact investments in order to benefit the local communities most directly affected by Rutgers University. The funds currently invested in Israel's occupation and apartheid regime could be put to much better use supporting the

¹⁷⁴ Rutgers University Senate. "University Senate Executive Committee Agenda." New Jersey, United States of America, October 7, 2022. <https://senate.rutgers.edu/wp-content/uploads/2022/04/October-2022-EC-Agenda.pdf>. PDF.

communities of New Brunswick, Newark, and Camden with whom Rutgers shares a home. Community reinvestment might look into the following areas to generate positive externalities: affordable housing, sustainable community energy projects, sustainable local food systems, social enterprises, cooperatives, worker co-op business succession, arts and culture, community hubs and co-working spaces, or non-profit health and social services. Regardless of the specific investment strategies and vehicles to be pursued, the guiding principle remains clear: rather than engage in death-dealing investments, Rutgers must utilize its endowment fund in service of institutions, infrastructures, and practices affirming life and dignity for all.

Standing with the people of Palestine against Israel's campaign of genocide, apartheid, and settler colonial violence today is the surest path forward towards this long-term vision for justice. A fierce commitment to freedom and justice drives our demands; Palestine and its people for too long have been deprived of both. Yet the Palestinian people remain steadfast and resilient and continue to strive for liberation and a dignified, peaceful, secure life in the lands from which their grandparents were expelled and to which they will return. We reject the fragmentation and pressures that the occupying powers employ to numb and suffocate us into accepting the world as is. We can accept neither injustice nor silence and inaction in the face of it.

Today, the moral arc of the universe bends towards Palestine. Rutgers may either choose to continue its support for an apartheid regime that commits crimes against humanity and has demonstrated itself to be indifferent to the right to life, or it may choose to end its complicity in the genocide of the Palestinian people by divesting and severing all ties with the Israeli occupation now. We believe this document has made abundantly clear that the only acceptable choice is the latter. In making this case, we deliver our message in unison with the voices of Palestine and with the conviction that liberation is inevitable.

Free Palestine

حرروا فلسطين

Appendix A

Further Notes on the Occupation of Palestine and Siege on Gaza

- In addition to the forced displacement of 750,000 Palestinians, the Nakba of 1948 also included the perpetration of more than 70 massacres of the Palestinian people, the destruction of approximately 530 villages and towns, the seizure of 78% of historic Palestine, and the fragmentation of the land and its people.¹⁷⁵ The remaining 22% of Palestine then came under Israel's illegal occupation in the Nakba of 1967, in which a further 250,000 Palestinians were expelled from the land and the Holy City of Jerusalem came under full Israeli occupation.¹⁷⁶
- Since the 1980s, Israel has imposed restrictions on Palestinians by introducing a permit system requiring that Palestinians in Gaza secure extremely difficult to obtain authorization in order to work or travel through Israel or access the occupied West Bank and East Jerusalem. Similarly, in 1993, Israel began using closure tactics on the Palestinian territories, in which it barred any and all Palestinians in specific areas from leaving, sometimes for months at a time. Israel began to enforce a separation between the Palestinian territories in 1995 when it built an electronic fence and concrete wall around the Gaza strip that collapsed the possibility of any interaction between the West Bank region and the Gaza Strip. In the early 2000s, Israel canceled the majority of the existing travel and work permits in Gaza and reduced the number of new permits that were being issued. During this time, Israel also bombed and demolished the Gaza airport and pulled 8,000 Jewish Israelis that had been living in illegal settlements within Gaza out of the strip. Israel has continued to enforce its system of apartheid through military checkpoints and the sanctioning colonial settlements, both of which serve to fracture and ghettoize Palestine.¹⁷⁷
- Israel's enforcement of an open air prison for Palestinians began in 2007 when it imposed an airtight land, sea, and air blockade on the 141 square mile area that housed around 2 million displaced Palestinians, controlling the airspace, waters, and two of the three border crossing points on land, with the third being controlled by Egypt. The Israeli and Egyptian governments completely shut their borders, with the Israeli government only allowing passage in "exceptional humanitarian cases, with an emphasis on urgent medical bases" and the Egyptian government opening its crossing point only on an irregular basis.¹⁷⁸
- Since the blockade began in 2007, Israel has conducted four major attacks on the

¹⁷⁵ Al Jazeera. "The Nakba Did Not Start or End in 1948," May 23, 2017.

<https://www.aljazeera.com/features/2017/5/23/the-nakba-did-not-start-or-end-in-1948>.

¹⁷⁶ The New Arab. "Naksa Explainer: How Israel'S 1967 Invasion Is Still Felt," June 5, 2023.

<https://www.newarab.com/news/naksa-explainer-how-israels-1967-invasion-still-felt>.

¹⁷⁷ Amnesty International. "Israel'S Apartheid Against Palestinians," June 23, 2023.

<https://www.amnesty.org/en/latest/campaigns/2022/02/israels-system-of-apartheid/>.

¹⁷⁸ "Gaza Strip: A Beginner's Guide to an Enclave Under Blockade," *Al Jazeera*, October 8, 2023,

<https://www.aljazeera.com/news/2021/3/14/a-guide-to-the-gaza-strip>.

Palestinians within Gaza.¹⁷⁹ In 2008, during Operation Cast Lead, Israel conducted unrelenting aerial attacks coupled with intensive ground invasion within the Gaza strip, leading to the death of 1,387 Palestinians of which 320 were children. The next attack by Israeli forces was in 2012 in an operation named Pillar of Defense, which similarly included airstrikes and a ground invasion and resulted in the death of 167 Palestinians, of which 35 were children.¹⁸⁰ The third attack, Operation Protective Edge in 2014, lasted 50 days and resulted in the death of more than 2,000 Palestinians, of which more than 500 were children.¹⁸¹ The last attack is the one which we are currently witnessing, which has been coined Operation Swords of Iron by the Israeli military.

¹⁷⁹ Danylo Hawaleshka, “The Gaza Strip: Under Siege, at War With Israel,” *Al Jazeera*, October 27, 2023, <https://www.aljazeera.com/gallery/2023/10/27/the-gaza-strip-under-siege-at-war>.

¹⁸⁰ Yael Stein, “Human Rights Violations During Operation Pillar of Defense: 14-21 November 2012” (B’Tselem, January 1, 2013), https://www.btselem.org/download/201305_pillar_of_defense_operation_eng.pdf. PDF.

¹⁸¹ Yael Stein, “Human Rights Violations During Operation Pillar of Defense: 14-21 November 2012” (B’Tselem, January 1, 2013), https://www.btselem.org/download/201305_pillar_of_defense_operation_eng.pdf. PDF.

Appendix B

Further Notes on Consensus Among International Courts and Organizations Regarding Palestine

- Despite ICJ orders to prevent the commission of acts infringing upon the Genocide Convention¹⁸²—which include killing, the infliction of bodily or mental harm, the rendering of destructive conditions of life, and the prevention of birth—Israel has continually employed extra-legal and martial means of circumventing these directives. Further, the State of Israel has failed to prevent or punish the direct and public incitement to genocide by various members of its constituency (including state officials) in spite of its legal obligations to the contrary. Israel was also ordered by the ICJ to provide basic services and humanitarian assistance to Palestinians in the Gaza Strip *immediately* and *effectively*.¹⁸³ The legal customs to which the State of Israel has demonstrated an unending insubordination date as far back as the 1948 Convention on the Prevention and Punishment of the Crime of Genocide (“the Genocide Convention”).
- On February 9, orders to formalize plans for “evacuating the population and destroying the battalions” of Rafah were announced by the office of Prime Minister of the State of Israel Benjamin Netanyahu. Rafah is a city to which over one million Palestinians have recently fled at the behest of the State of Israel and serves as a key entry point for aid into the Gaza Strip. Rafah is six times more populous now than before its refashioning into a *de facto* camp for displaced Palestinian refugees. Its threatened bombardment can only serve to exacerbate an ongoing humanitarian catastrophe at the cost of civilian life. On February 11, Rafah was nevertheless subjected to an illegal and intense assault by the IOF. The following day, the Republic of South Africa submitted another urgent request for measures to be taken toward the application of the Genocide Convention. These developments are indicative of mounting international and intergovernmental pressures in favor of a liberated Palestine.¹⁸⁴
- Amnesty International has termed Israel’s restrictions on the entry of food into Gaza a “deliberately engineered famine”.¹⁸⁵ Human Rights Watch and the Association of

¹⁸²The Hague, “APPLICATION OF THE CONVENTION ON THE PREVENTION AND PUNISHMENT OF THE CRIME OF GENOCIDE IN THE GAZA STRIP (SOUTH AFRICA v. ISRAEL),” The Hague, January 26, 2024, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240126-ord-01-00-en.pdf>.

¹⁸³ The Hague, “APPLICATION OF THE CONVENTION ON THE PREVENTION AND PUNISHMENT OF THE CRIME OF GENOCIDE IN THE GAZA STRIP (SOUTH AFRICA V. ISRAEL) URGENT REQUEST FOR ADDITIONAL MEASURES UNDER ARTICLE 75(1) OF THE RULES OF COURT OF THE INTERNATIONAL COURT OF JUSTICE,” The Hague, February 12, 2024, <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240212-wri-01-00-en.pdf>.

¹⁸⁴ The Hague, “APPLICATION OF THE CONVENTION ON THE PREVENTION AND PUNISHMENT OF THE CRIME OF GENOCIDE IN THE GAZA STRIP (SOUTH AFRICA V. ISRAEL) URGENT REQUEST FOR ADDITIONAL MEASURES UNDER ARTICLE 75(1) OF THE RULES OF COURT OF THE INTERNATIONAL COURT OF JUSTICE,”

¹⁸⁵ Amnesty International, “Israel Must Comply with Key ICJ Ruling Ordering It Do All in Its Power to Prevent Genocide against Palestinians in Gaza,” Amnesty International, January 29, 2024, <https://www.amnesty.org/en/latest/news/2024/01/israel-must-comply-with-key-icj-ruling-ordering-it-do-all-in-its-power-to-prevent-genocide-against-palestinians-in-gaza/>.

International Development Agencies have condemned Israel's obstruction of aid deliveries to Palestinians in spite of its legal responsibility to protect civilians, while French aid groups Médecins du Monde and Doctors Without Borders reported the destruction of their facilities by Israeli forces just weeks after the provision of the ICJ measures.¹⁸⁶

- At the request of the UN General Assembly, beginning on February 19, the ICJ heard public submissions from the State of Palestine along with submissions from 52 nations and 3 international bodies in the advisory hearings on the “Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem.” In these hearings, Palestinian representatives and international lawyers stressed the need for the immediate, unconditional end of the unlawful and unjust Israeli occupation and the removal of all impediments to the self-determination of the Palestinian people, in movement towards Palestinian statehood. In representation of Palestine, US attorney Paul Reichler declared of the decades-long Israeli occupation that "International law requires that this entire illegal enterprise be terminated."¹⁸⁷

¹⁸⁶ Wafaa Shurafa, Tia Goldenberg, and Kareem Chehayeb, “Human Rights Watch Says Israel Is Violating Order from Top U.N. Court by Blocking Aid to Gazans,” PBS, February 26, 2024, <https://www.pbs.org/newshour/world/human-rights-watch-says-israel-is-violating-order-from-top-u-n-court-by-blocking-aid-to-gazans>.

¹⁸⁷ The Hague, “The International Court of Justice (ICJ) Holds Public Hearings in the Advisory Proceedings - State of Palestine | UN Web TV,” United Nations, February 19, 2024, <https://webtv.un.org/en/asset/k13/k13rkfn015>.