

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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MAURICE SHNAIDER

247 Albany Avenue, Kingston, NY 12401;

HAL DAVID LUBIN, as personal representative of the
ESTATE OF ROSE IDA LUBIN,

5018 Wyntergate Drive Dunwoody, GA 30338;

Civ. No. 25-CV-538

ROBIN LYNN LUBIN, as personal representative of the
ESTATE OF ROSE IDA LUBIN, 5018 Wyntergate

Drive Dunwoody, GA 30338;

TALIA ZAHAVA FRIEDMAN, as personal
representative of the Estate of **ZACHARY PHILIP
HABER**,

9 Walter Aveles Street, Apt 52, Jerusalem;

AYELET NEHAMA NEWMAN-KELMANSON,
individually,

Mitspe Dvir St 104, Otniel, Israel;

DAVID BOLLAG, as the father and natural guardian of
S.B.,

Maccabi 42, Ra'anana, Israel;

DIKLA MIZRACHI, as personal representative of the
ESTATE OF BEN MENASHE MIZRACHI,

3970 Laurel Street V5Z3V6 Vancouver BC, Canada;

ORIT NAHAMIAS,

Netiv Ha'asara, Israel;

YINON SHARABI,

Hashomer 38, Sderot, Israel;

LIAT OREN WACHS, individually and as personal
representative of the **ESTATE OF IGAL WACHS**, and
as the mother and natural guardian of **J.W.**, a minor,

5 Gould Rd. Lexington, MA 02420;

NICHOLAS ALBERT MERKIN, as the father and natural guardian of **I.T.M.**, a minor,
Ahad Ha'am 42D, Ra'anana, Israel;

ALLEN SAMUEL KAMER, as the father and natural guardian of **N.E.K.**, minor,
Einstein 4, Ra'anana, Israel;

JOSHUA SETH HEXTER as personal representative of the **ESTATE OF YAKIR HEXTER**,
Yishi Street 3, Jerusalem, Israel;

MEITAL GABRIELA GITLER, individually and as personal representative of the **ESTATE OF DAVID SCHWARTZ**,
Harei Gofna 212, El'azar, Israel;

HAIM BERNSTEIN, individually and as personal representative of the **ESTATE OF YEHONATAN TZOR** a/k/a Yehonatan Bernstein,
Kefar Maimom, Israel;

ETHAN KESSLER HALLEY a/k/a Eitan Kessler Halley;
Hagefen 26, Karnei Shomron, Israel;

DVORA BATYA SAADON, as personal representative of the **ESTATE OF HALLEL SHMUEL SAADON**,
Hamoria Street 135, Ma'ale Mihmas, Israel;

ISAAC MARGULIES,
2412 Wentworth Lane, Aurora, IL 60502;

LIMOR ROM, as personal representative of the **ESTATE OF JONATHAN ROM** a/k/a Yonatan Rom,
Hashaked Street 20/1, Mivaseret Tzion, Israel;

TOMER ROM, as personal representative of the **ESTATE OF JONATHAN ROM** a/k/a Yonatan Rom,
Nof Harim Street 171, Har Adar, Israel;

YONAH CHAVA LANDAU ZENILMAN, individually
and as personal representative of the **ESTATE OF ARI
YEHIEL WEINSOFF ZENILMAN**,
25 Uruguay Street, Entrance 2, Apartment #8, Jerusalem,
Israel;

MARCY ANN TATELBAUM, as representative of the
ESTATE OF YAKIR SHMUEL TATELBAUM,
Mitzpeh Nevo 67/3, Maaleh Adumim, 9841052, Israel;

and

JULIANA FARRON a/k/a Juliana Bausi, as personal
representative of the **ESTATE OF ITAI YEHUDA
BAUSI**,
Kvutsat Yavne D. N. Evtach, 7923300 Israel;

-against-

AL JAZEERA MEDIA NETWORK, a foreign
company,
Qatar Television Building, Khalifa Street, Wadi al Sail,
Doha, Qatar;

and

AL JAZEERA INTERNATIONAL (USA) LLC, a
Delaware limited liability company,
251 Little Falls Drive, Wilmington, Delaware 19808,

Defendants.

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COMPLAINT

Plaintiffs, by their undersigned counsel, complain of Al Jazeera Media Network and Al Jazeera International USA LLC (collectively, “Al Jazeera” or “Defendants”), and allege for their complaint upon information and belief as follows:

INTRODUCTION

1. This is an action for damages against Al Jazeera pursuant to the Anti-Terrorism Act (ATA), 18 U.S.C. § 2333, as amended by the Justice Against Sponsors of Terrorism Act (JASTA), Pub. L. No. 114-222 (2016), for aiding, abetting, and knowingly providing support and resources to the Islamic Resistance Movement (“ Hamas”) and the Palestine Islamic Jihad (the “ PIJ”), both of which are designated Foreign Terrorist Organizations (“ FTOs”).¹

2. This action is brought on behalf of American citizens who were killed, severely injured, or suffered profound psychological and emotional trauma—or whose family members were killed or gravely harmed—as a result of the October 7, 2023 terrorist attacks perpetrated by Hamas and the PIJ (the “ October 7 Terrorist Attacks”) and their aftermath, as well as other acts of terrorism and violence perpetrated by these groups.

3. The ATA, as amended by JASTA, allows victims of terrorism to bring civil lawsuits for an injury arising from an act of international terrorism committed by a Foreign Terrorist Organization, and liability may be asserted as to any person who aids and abets, by knowingly providing substantial assistance, or who conspires with the person who committed such an act of international terrorism.” 18 U.S.C. § 2333(d)(2)

4. “ Any national of the United States injured in his or her person, property, or business by reason of an act of international terrorism, or his or her estate, survivors, or heirs, may sue therefor in any appropriate district court of the United States and shall recover threefold the damages he or she sustains and the cost of the suit, including attorney’s fees.” 18 U.S.C. § 2333(a)

5. Defendants’ actions—including employing and compensating journalists who are Hamas and the PIJ operatives, compensating FTO leaders and operatives for interviews to incite

¹ <https://www.state.gov/foreign-terrorist-organizations/> (last visited on September 18, 2024)

violence, as well as providing a platform for Hamas and the PIJ to organize their terrorist agenda, communicate their terrorist plans, recruit terrorist members, and incite violence—facilitated the planning and execution of the October 7 Terrorist Attacks and other acts of terrorism. These actions directly harmed the Plaintiffs.

6. Defendants aided and abetted, by knowingly providing substantial assistance, and conspired with Hamas and the PIJ—both designated Foreign Terrorist Organizations—to commit international acts of terrorism, as defined by 18 U.S.C. § 2331, in violation of 18 U.S.C. § 2333(d)(2). Further, Defendants provided material support to Hamas and the PIJ in violation of 18 U.S.C. §§ 2339A and 2339B. As a result, Defendants are civilly liable under § 2333 of the ATA to Plaintiffs, who have suffered injury to their person, property, and/or business by reason of Hamas's and the PIJ's acts of international terrorism.

7. Plaintiffs seek damages under 18 U.S.C. § 2333 of the ATA for the Defendants' roles in conspiring with, and aiding and abetting by providing material support to, Hamas and the PIJ in their commission of acts of international terrorism as defined by 18 U.S.C. § 2331.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1367, which provide for federal question jurisdiction and supplemental jurisdiction. Jurisdiction is also proper under 18 U.S.C. §§ 2333 and 2334, which authorize civil actions brought by U.S. citizens, their estates, survivors, or heirs who have been injured by acts of international terrorism.

9. Personal jurisdiction over Defendants is proper under D.C. Code § 13-422. Defendants have substantial contacts with the District of Columbia. Multiple Al Jazeera subsidiaries are either headquartered or at home in Washington D.C., including Al Jazeera Plus

(AJ+) which is a subsidiary of Al Jazeera Media Network. Defendant Al Jazeera International (USA) LLC's principal place of business is located in Washington, D.C.²

10. While headquartered in Doha, Qatar, and hosting 70 bureaus worldwide, Defendant Al Jazeera Media Network lists four locations on its LinkedIn page, with Washington, D.C. being the only U.S. location listed.³ The Washington, D.C. office serves as a primary hub for Al Jazeera's U.S. operations. Al Jazeera's presence in Washington D.C. has included over 100 staff credentialed for Congressional press galleries.⁴ In recent months, Al Jazeera Media Network has solicited jobs based in the Washington, D.C. area on behalf of itself, Al Jazeera English, and their shows. Defendants operate Al Jazeera English, which is a part of Al Jazeera Media Network, distributing content to U.S. audiences, including via streaming platforms like Sling TV. Additionally, Al Jazeera English produces and broadcasts *UpFront*, a program created, filmed, and aired in Washington, D.C.⁵ and *Fault Lines*, a program based in Washington, D.C.⁶ Al Jazeera explicitly targets American audiences and produces, films, and airs programming specifically in Washington, D.C., engaging in continuous and systematic activities in the District of Columbia.

11. In the interests of justice, this case should be adjudicated in the U.S., and specifically in this District where Defendants have substantial contacts. Hamas is not designated as a terrorist organization in Qatar and instead receives support there. Forcing Plaintiffs, who are

² <https://www.nlr.gov/case/05-RC-225958> (last visited on October 28, 2024)

³ <https://www.linkedin.com/company/aljazeera/about/> (last visited on October 28, 2024)

⁴ Report Concerning Qatar's Al Jazeera Media Network & the Foreign Agents Registration Act (July 6, 2020); <https://efile.fara.gov/docs/3492-Informational-Materials-20200708-59.pdf>

⁵ "The Washington DC-based show features one-on-one interviews and arena discussions with international politicians, newsmakers, academics and activists." *Marc Lamont Hill to Host UpFront on Al Jazeera* (January 27, 2021); <https://network.aljazeera.net/en/pressroom/marc-lamont-hill-host-upfront-al-jazeera>

⁶ [https://en.wikipedia.org/wiki/Fault_Lines_\(TV_program\)](https://en.wikipedia.org/wiki/Fault_Lines_(TV_program)) (last visited on November 3, 2024)

U.S. citizens, to bring their ATA claims in Qatar would deprive them of a suitable forum to resolve their claims.

12. Personal jurisdiction over Defendants is proper under D.C. Code § 13-423. Defendants, through Al Jazeera English and Al Jazeera's Arabic Channels (Al Jazeera Arabic and Al Jazeera Mubasher), divisions and agents of Defendants, purposefully direct content toward U.S. audiences, including substantial viewership in the District of Columbia, by distributing programming on U.S.-based streaming platforms such as Sling TV. Additionally, Al Jazeera English produces and broadcasts *UpFront*, a program created, filmed, and aired from Washington, D.C.⁷ Defendant Al Jazeera Media Network actively manages social media pages for both Al Jazeera English and *UpFront*,⁸ specifically targeting and engaging U.S. audiences, including those in D.C. Defendants have purposefully availed itself of the privilege of doing business in D.C. Furthermore, Defendants caused tortious injury within the District by broadcasting interviews with designated terrorists on *UpFront* and airing terrorist-related content on Al Jazeera English and other Al Jazeera Media Network channels, which was accessible within the District of Columbia and incited further violence. Defendants also featured interviews with individuals affiliated with terrorist organizations and showcased Al Jazeera employees who are Hamas operatives. These actions further incited violence and impacted viewers nationwide, including in Washington, D.C. This establishes a direct connection between Defendants' conduct in Washington, D.C. and Plaintiffs' claims under the ATA, thereby satisfying the requirements for specific jurisdiction. Furthermore, by interviewing designated terrorists on *UpFront*, a show produced in Washington,

⁷ *Id.*

⁸ https://www.facebook.com/aljazeera/about_profile_transparency (last visited on October 29, 2024); https://www.facebook.com/AJUpFront/about_profile_transparency (last visited on October 29, 2024)

D.C., Defendants are compensating designated terrorists out of Washington, D.C. which establishes a direct connection between Defendants' conduct in Washington, D.C. and Plaintiffs' claims under the ATA.

13. Alternatively, under Federal Rule of Civil Procedure 4(k)(2), this Court may exercise personal jurisdiction for federal claims when Defendants are not subject to jurisdiction in any state's courts, and their contacts with the U.S. as a whole meet constitutional standards.

14. Venue is appropriate in this Court under 18 U.S.C. § 2334(a) as Defendant Al Jazeera International (USA) LLC's principal place of business is located in Washington, D.C.

THE PARTIES

15. Plaintiff Maurice Shnaider, at all times relevant hereto, is an American citizen domiciled in New York and the brother of Margit Silverman, deceased, brother-in-law of Yosi Silverman, deceased, uncle of Shiri Bibas and Yarden Bibas, and great uncle of Kfir and Ariel Bibas, who were kidnapped by Hamas on October 7, 2023 and remain in Gaza.

16. Plaintiff Hal David Lubin, at all times relevant hereto, is an American citizen domiciled in Georgia and the personal representative of the estate of decedent Rose Ida Lubin, an American citizen. Plaintiff Hal David Lubin brings this action on behalf of the estate of Rose Ida Lubin.

17. Plaintiff Robin Lynn Lubin, at all times relevant hereto, is an American citizen domiciled in Georgia and the personal representative of the estate of decedent Rose Ida Lubin, an American citizen. Plaintiff Robin Lynn Lubin brings this action on behalf of the estate of Rose Ida Lubin.

18. Plaintiff Talia Zahava Friedman, at all times relevant hereto, is an American citizen domiciled in Israel and the personal representative of the estate of decedent Zachary Philip Haber.

19. Plaintiff Ayelet Nehama Newman-Kelmanson, at all times relevant hereto, is an American citizen domiciled in Israel and is the wife of Menachem Kelmanson, an Israeli citizen, who was severely injured by terrorists on October 7, 2023 and the sister-in-law of Elchanan Kelmanson, who was killed by terrorists on October 7, 2023. Ayelet Nehama Newman-Kelmanson brings this action individually.

20. Plaintiff S.B., who was severely injured in a terrorist attack, at all times relevant hereto, is an American citizen domiciled in Israel and son of plaintiff David.

21. Plaintiff David Bollag, at all times relevant hereto, is the father of Plaintiff S.B. and brings this action as natural guardian of his minor child, Plaintiff S.B.

22. Plaintiff Dikla Mizrachi, at all times relevant hereto, is an American citizen domiciled in Canada and the personal representative of the estate of decedent Ben Menashe Mizrachi, an American citizen.

23. Plaintiff Orit Nahamias, at all times relevant hereto, is an American citizen domiciled in Israel and the sister of decedent Chen Nahmias.

24. Plaintiff Yinon Sharabi, who was severely psychologically and emotionally injured during a terrorist attack, at all times relevant hereto, is an American citizen domiciled in Israel.

25. Plaintiff Liat Oren Wachs, at all times relevant hereto, is an American citizen domiciled in Massachusetts and the wife, heir, and personal representative of the estate of decedent Igal Wachs, an American citizen. Plaintiff Liat Oren Wachs is the mother of Plaintiff J.W. Plaintiff Liat Oren Wachs brings this action individually, on behalf of the estate of Igal Wachs, and as natural guardian of her minor child, Plaintiff J.W.

26. Plaintiff I.T.M., who was severely injured in a terrorist attack, at all times relevant hereto, is an American citizen domiciled in Israel. Plaintiff Nicholas Albert Merkin, at all times

relevant hereto, is an American citizen domiciled in Israel and the father of Plaintiff I.T.M. Plaintiff Nicholas Albert Merkin brings this suit as natural guardian of his minor child, Plaintiff I.T.M.

27. Plaintiff N.E.K., who was severely injured in a terrorist attack, at all times relevant hereto, is an American citizen domiciled in Israel and son of Plaintiff Stacey Rubtchinsky Kamer.

28. Plaintiff Allen Samuel Kamer, at all times relevant hereto, is an American citizen domiciled in Israel and the father of Plaintiff N.E.K. Plaintiff Allen Samuel Kamer brings this suit as natural guardian of his minor child, Plaintiff N.E.K.

29. Plaintiff Joshua Seth Hexter, at all times relevant hereto, is an American citizen domiciled in Israel and the personal representative of the estate of decedent Yakir Hexter, an American citizen.

30. Plaintiff Meital Gabriela Gitler, at all times relevant hereto, is an American citizen domiciled in Israel and the wife, heir, and personal representative of the estate of decedent David Schwartz.

31. Plaintiff Haim Bernstein, at all times relevant hereto, is an American citizen domiciled in Israel and the father of decedent Yehonatan Tzor. Plaintiff Haim Bernstein brings this action individually and on behalf of the estate of Yehonatan Tzor.

32. Plaintiff Ethan Kessler Halley a/k/a Eitan Halley, who was severely injured in a terrorist attack, at all times relevant hereto, is an American citizen domiciled in Israel.

33. Plaintiff Dvora Batya Saadon, at all times relevant hereto, is an American citizen domiciled in Israel and the personal representative of the estate of decedent Hallel Shmuel Saadon, an American citizen.

34. Plaintiff Isaac Margulies, who was severely wounded in a terrorist attack, at all times relevant hereto, is an American citizen domiciled in Israel.

35. Plaintiff Limor Rom, at all times relevant hereto, is the personal representative of the estate of decedent Jonathan Rom a/k/a Yonatan Rom, an American citizen. Plaintiff Limor Rom brings this action on behalf of the estate of Jonathan Rom.

36. Plaintiff Tomer Rom, at all times relevant hereto, is the personal representative of the estate of decedent Jonathan Rom a/k/a Yonatan Rom, an American citizen. Plaintiff Tomer Rom brings this action on behalf of the estate of Jonathan Rom.

37. Plaintiff Yonah Chava Landau Zenilman, at all times relevant hereto, is an American citizen domiciled in Israel and the wife, heir, and personal representative of the estate of decedent Ari Yehiel Weinsoff Zenilman, an American citizen. Plaintiff Yonah Chava Landau Zenilman brings this action individually, on behalf of the estate of Ari Yehiel Weinsoff Zenilman.

38. Plaintiff Marcy Ann Tatelbaum, at all times relevant hereto, is an American citizen domiciled in Israel and the mother of decedent Yakir Shmuel Tatelbaum, an American citizen.

39. Plaintiff Juliana Farron Bausi, at all times relevant hereto, is an American citizen domiciled in Israel and the personal representative of the estate of decedent Itai Yehuda Bausi, an American citizen. Plaintiff Juliana Farron Bausi brings this action on behalf of the estate of Itai Yehuda Bausi.

40. Defendant Al Jazeera Media Network is a global media conglomerate headquartered in Doha, Qatar. Established in 1996, the network operates multiple channels, including Al Jazeera Arabic and Al Jazeera English, distributing content worldwide via television, online platforms, and social media.

41. Defendant Al Jazeera International (USA) LLC is a Delaware limited liability company and a subsidiary of Al Jazeera Media Network. Its main office is located at 1200 New Hampshire Avenue NW, Washington, D.C., which serves as a primary hub for the network's U.S.

activities, including Al Jazeera English. The network's content is distributed to U.S. viewers through platforms like Sling TV, YouTube, and streaming services such as Roku, Amazon Fire TV, and Apple TV.

UNDERLYING FACTS

Hamas Terrorist Organization

42. The Islamic Resistance Movement (Harakat Al-Muqawama Al-Islamia), known by its Arabic acronym " Hamas," is a radical terrorist organization established by Islamic militants in 1987 as the Palestinian branch of the extremist Muslim Brotherhood.

43. The United States has designated Hamas as a Foreign Terrorist Organization since 1997.⁹

44. Hamas's charter, first published in 1988, states that "Israel will exist and will continue to exist until Islam will obliterate it" and that "there is no solution to the Palestinian question except through Jihad."¹⁰ Hamas's goal is the destruction of the State of Israel and the establishment of an Islamic state in Israel, the West Bank, and the Gaza Strip. Hamas openly declares its use of terrorism as a legitimate means to achieve these objectives.¹¹

45. Hamas has carried out thousands of terrorist attacks, including suicide bombings, kidnappings, and rocket launches targeting Israeli civilians and military personnel. These attacks

⁹ <https://www.state.gov/foreign-terrorist-organizations/> (last visited on September 18, 2024)

¹⁰ Hamas Covenant 1988, https://avalon.law.yale.edu/20th_century/hamas.asp

¹¹ *Ibid.* "It is the duty of the followers of other religions to stop disputing the sovereignty of Islam in this region, because the day these followers should take over there will be nothing but carnage, displacement and terror."

have resulted in the deaths and severe injury of many Israeli and U.S. citizens. Hamas's policy of violence and terrorism is widely recognized.¹²

46. Since taking control of the Gaza Strip in 2007, Hamas has fired thousands of rockets and mortar shells into Israel, terrorizing civilian populations.¹³ Hamas frequently attempts cross-border infiltrations to carry out attacks and kidnappings.¹⁴

47. Hamas's policy and practice of carrying out terrorist attacks has been notorious and well known to the public, including the Defendants. These terrorist attacks have been routinely reported on and publicized worldwide by the Defendants through its global media network.

The PIJ Terrorist Organization

48. The Palestinian Islamic Jihad (PIJ), another radical terrorist organization, shares Hamas's goal of destroying Israel and establishing an Islamic state through terrorism.¹⁵ The PIJ has been involved in numerous terrorist attacks targeting U.S. civilians and Israeli civilians and soldiers, using violence to coerce and intimidate the Israeli government.

¹² Justice Department Announces Terrorism Charges Against Senior Leaders of Hamas (September 3, 2024), <https://www.justice.gov/opa/pr/justice-department-announces-terrorism-charges-against-senior-leaders-hamas> (“‘For decades, Hamas and its leadership have dedicated themselves to the eradication of the State of Israel, and to murdering, maiming, and brutalizing anyone — including dozens of Americans — who stood in their way,’ said U.S. Attorney Damian Williams for the Southern District of New York. ‘The October 7 Hamas Massacres – in which over 40 American citizens were murdered – is only the latest act of savagery carried out by Hamas.’”)

¹³ Rocket & Mortar Attacks Against Israel by Date (2001 - Present), <https://www.jewishvirtuallibrary.org/palestinian-rocket-and-mortar-attacks-against-israel>

¹⁴ Palestinian Tunnel Warfare in the Gaza Strip, https://en.wikipedia.org/wiki/Palestinian_tunnel_warfare_in_the_Gaza_Strip (last visited on September 23, 2024)

¹⁵ PALESTINE ISLAMIC JIHAD (PIJ) (as of February 2023) [https://www.dni.gov/ncfc/ftos/pij_fto.html#:~:text=The%20Palestine%20Islamic%20Jihad%20\(PIJ,to%20the%20destruction%20of%20Israel](https://www.dni.gov/ncfc/ftos/pij_fto.html#:~:text=The%20Palestine%20Islamic%20Jihad%20(PIJ,to%20the%20destruction%20of%20Israel) (last visited on September 18, 2024)

49. Since 1997, the United States has designated the PIJ as a Foreign Terrorist Organization.¹⁶

50. The PIJ's activities—including bombings, shootings, and rocket attacks—are widely known and publicized. These terrorist attacks have been routinely reported on and publicized worldwide by the Defendants through its global media network.

Al Jazeera

51. Established in Qatar in 1996, Al Jazeera is a media news network that describes itself as “one of the largest and most influential international news networks in the world.”¹⁷ Al Jazeera Mubasher (Live) was launched in 2005 for continuous live coverage of news events. In 2006, Al Jazeera launched an English-language channel, Al Jazeera English, aimed at reaching a global audience. Al Jazeera Plus was launched in 2013 as part of Al Jazeera's initiative to expand its digital content offerings to reach a younger audience, and in 2017, it was rebranded as AJ+, which continued to emphasize digital-first content and expanded its presence across various social media platforms. Al Jazeera has extensive reach across the globe and is distributed in over 150 countries and territories in more than 430 million homes.¹⁸

52. Since its establishment in 1996, Al Jazeera has aligned itself with terrorist organizations by working with such organizations to further their terrorist agenda, paying terrorist leaders for interviews, and providing a platform to assist these terrorist groups to organize, communicate their terrorist agenda, recruit new members, and incite violence.

53. This alignment has continued to the present. “Since Hamas' October 7, 2023 attack in southern Israel, in which some 1,200 Israelis were murdered and about 240 were kidnapped,

¹⁶ <https://www.state.gov/foreign-terrorist-organizations/> (last visited on September 18, 2024)

¹⁷ <https://network.aljazeera.net/en/about-us#page-20> (last visited on August 28, 2024)

¹⁸ *Ibid.*

Qatar’s Al-Jazeera channel has been serving as a major mouthpiece for Hamas and the Iran-backed terror militias.”¹⁹

FACTUAL ALLEGATIONS

Al Jazeera Journalists Tied to Hamas and the PIJ: Correspondents are Operatives

54. Al Jazeera has consistently referred to Hamas and PIJ operatives—who have publicly identified themselves as such—as its journalists and reporters. Al Jazeera knowingly paid these Hamas and PIJ operatives to act as journalists and reporters. Even after their terrorist activities and affiliations were exposed, Al Jazeera has continued to employ and compensate these terrorists.

A. Ismail Abu Omar: Al Jazeera Employee—Hamas Terrorist

55. Al Jazeera refers to Ismail Abu Omar as an Al Jazeera journalist.²⁰

56. Omar is also a Hamas terror operative and actively participated in the October 7 Terrorist Attacks.²¹ Videos published by him show him entering Israel on October 7 and riding towards Kibbutz Nir Oz with multiple armed Hamas men.²²

57. Following the October 7 Terrorist Attacks, Israel publicly identified Omar as a Hamas terror operative who served as a training company commander in the East Khan Younis

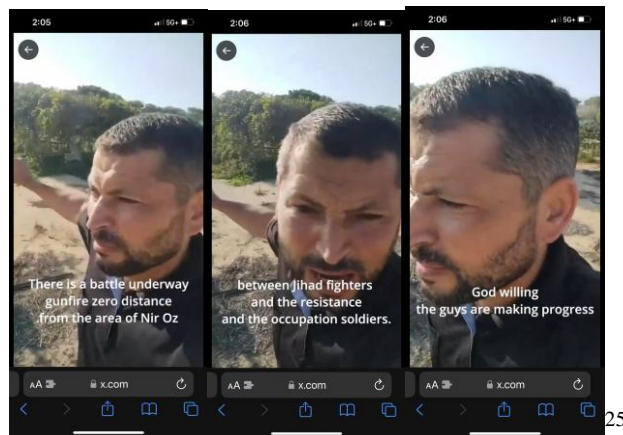
¹⁹ Arab Journalists: Al-Jazeera Is A Mouthpiece Of The Terrorist Organizations (November 22, 2023), <https://www.memri.org/reports/arab-journalists-al-jazeera-mouthpiece-terrorist-organizations>

²⁰<https://www.aljazeera.com/news/2024/2/13/journalists-including-al-jazeera-reporter-injured-in-israel-gaza-strike> (Ismail Abu Omar referred to as “Al Jazeera Arabic correspondent.”)

²¹https://t.me/asmailpress/76726?fbclid=IwZXh0bgNhZW0CMTEAAAR2xBHTv7nxSPsD0w2LnzH69OumCxuj2Lu59LWJOs2BMAfn7ni93Zt7Chc_aem_AQDVvy2xTCToVNHY73TSZGuRutxQk6yl1dOhmSO7_OTAhpQtj3lL5sPfgIPi9Su4T111uF0_oTfKSaueMJSJNcAB (last visited on August 26, 2024)

²²https://t.me/asmailpress/76729?fbclid=IwZXh0bgNhZW0CMTEAAAR16aGVe6BsL8CkAUGkiR6DbAG_IXiETorPec4x17MEhQ1sAkPsiDftMdvY_aem_AQAOHlurDTMAQ8GGwE8c-63kWF90z3liFxD52vvmChqePWikU9tkGnzbv_aKdAGZL-HFr_d8pe62Mu4bUTMh42dM (last visited on August 26, 2024); <https://t.me/asmailpress/76735>

Battalion.²³ According to a spokesman for the Israel Defense Forces (“IDF”), Omar, on the morning of the October 7 Terrorist Attacks, filmed himself from inside Kibbutz Nir Oz during Hamas’s massacre, and, in addition to working for Al Jazeera, served as a “deputy company commander in Hamas’s East Khan Younis Battalion.”²⁴



58. Al Jazeera kept Omar as their paid employee and described him as an “Al Jazeera journalist” even after he was publicly identified as a Hamas commander.²⁶

59. In March 2024, the chairman of Al Jazeera’s board of directors visited Omar in the hospital after he was injured in an Israeli airstrike.²⁷

²³IDF Claims Uncovered Documents Prove 6 Al Jazeera Journalists are Hamas, PIJ Operatives (October 23, 2024); https://www.timesofisrael.com/liveblog_entry/idf-claims-uncovered-documents-prove-6-al-jazeera-journalists-are-hamas-pij-operatives/

²⁴ IDF Says Al Jazeera Reporter Wounded In Gaza Is Also A Hamas Deputy Commander, The Times of Israel (Feb 15, 2024), <https://www.timesofisrael.com/idf-says-al-jazeera-reporter-wounded-in-gaza-is-also-a-hamas-deputy-commander/> (last visited on August 21, 2024)

²⁵ <https://x.com/giladerdan1/status/1757886064620921140> (last visited on August 26, 2024)

²⁶ <https://www.youtube.com/watch?v=B3uj9cCQiT0> (last visited on August 21, 2024)

²⁷ <https://x.com/AbuAliEnglishB1/status/1764670872210600043> (last visited on August 21, 2024)

60. As of the date of this filing, Omar remains employed by Al Jazeera, which continues to refer to him as one of its Gaza correspondents.²⁸

B. Muhammad Washah: Al Jazeera Employee—Hamis Terrorist

61. Muhammad Washah refers to himself as a correspondent for Al Jazeera Mubasher (Al Jazeera Live).²⁹

62. Al Jazeera has identified Washah as an Al Jazeera correspondent, including as recently as January 2024.³⁰

63. In December 2015, Washah posted a photo of himself on Instagram, showing him receiving a book from Hamas's Dr. Mohammed Zaha.³¹

64. In January 2017, while already employed as an Al Jazeera reporter,³² Washah posted a photo on Instagram of himself with Hamas leader Ismail Haniyeh.³³ In his role at Al Jazeera, Washah has interacted with al-Qassam Brigade terrorists (Hamas's military wing) on live television³⁴ and has sat along-side Saraya Al Quds members (the armed wing of the PIJ) at their base.³⁵

²⁸ <https://www.facebook.com/watch/?v=802644452073532>; IDF Names 6 Al Jazeera Journalists As Members Of Hamas, Islamic Jihad After Uncovering Documents (October 23, 2024); <https://nypost.com/2024/10/23/world-news/idf-names-6-al-jazeera-journalists-as-members-of-hamas-islamic-jihad-after-uncovering-documents/>

²⁹ https://www.instagram.com/mohammed_s.m.wishah/?hl=en (last visited on August 21, 2024)

³⁰ <https://www.aljazeeramubasher.net/palestine/2024/1/15/منزلي-دمر-مراسل-الجزيرة-مباشرة-هكذا> (last visited on August 21, 2024)

³¹ <https://www.instagram.com/p/BNttkw9DEUx/> (last visited on August 26, 2024)

³² <https://www.instagram.com/p/BI0nmMQj7lv/> (last visited on September 24, 2024)

³³ <https://www.instagram.com/p/BP0AQ9MDfIX/> (last visited on August 26, 2024)

³⁴ <https://www.instagram.com/p/BOMvtUujFQC/> (last visited on August 26, 2024)

³⁵ <https://www.instagram.com/p/BLQ760LDCpY/> (last visited on August 26, 2024)

65. In February 2024, photos on Facebook show Washah training Hamas members on how to use Rocket-Propelled Grenades (“RPGs”), as well as preparing RPGs, other weapons, and drones.³⁶

66. In February 2024, the IDF recovered a laptop belonging to Washah in the northern Gaza Strip. Photos found on the laptop establish that Washah was a “prominent commander” in Hamas’s anti-tank missile unit and, as of late 2022, began working in research and development for Hamas’s air unit.³⁷

C. Hamza Al-Dahdouh and Mustafa Thuria: Al Jazeera Employees—Hamas and PIJ Terrorists

67. Hamza al-Dahdouh identified himself on Instagram as an Al Jazeera journalist and listed October 7 as his birthday, even though his birthday is actually on April 30.³⁸

68. In January 2024, an IDF aircraft targeted and assassinated the operators of a drone posing a threat to the IDF. The operators were later identified as al-Dahdouh and Mustafa Thuria. After their assassination for terrorist activity, al-Dahdouh and Thuria were referred to by Al Jazeera as “Al Jazeera Crew” who were assassinated while on duty.³⁹

69. Al-Dahdouh and Thuria were identified by the IDF as members of Gaza-based terrorist organizations. Documents found by the IDF in Gaza revealed Thuria’s role as Squad

³⁶ <https://www.facebook.com/photo/?fbid=954613112696963&set=pcb.954613169363624> (last visited on August 26, 2024)

³⁷ IDF Says Al Jazeera Reporter Wounded In Gaza Is Also A Hamas Deputy Commander, The Times of Israel (Feb 15, 2024), <https://www.timesofisrael.com/idf-says-al-jazeera-reporter-wounded-in-gaza-is-also-a-hamas-deputy-commander/> (last visited on August 21, 2024)

³⁸ https://www.instagram.com/hamza_w_dahdooh/?hl=en (last visited on August 21, 2024)

³⁹ Al Jazeera Condemns The Assassination Of Hamza Aldahdooh, <https://network.aljazeera.net/en/press-releases/al-jazeera-condemns-assassination-hamza-alдахdooh> (Jan 7, 2024)

Deputy Commander in Hamas's Gaza City Brigade, as well as Al-Dahdouh's roles in the PIJ's electronic engineering unit and previously as a deputy commander in the PIJ's Zeitun Battalion.⁴⁰

D. Ismail Al-Ghoul: Al Jazeera Employee— Hamas Terrorist

70. Ismail al-Ghoul was hired by Al Jazeera as an Arabic correspondent in Gaza in November 2023.

71. At the time Al Jazeera hired him, al-Ghoul had publicly stated his commitment to Hamas.⁴¹

72. Before becoming an Al Jazeera reporter, al-Ghoul attended a pro-Hamas/PIJ gathering on May 21, 2021, praising Hamas's resistance, with a post on his Instagram Account:

How great Gaza is . . . [I]t sends a message to the resistance that we are on your path, ready to offer everything we have for you. It sends a message to the leader of the resistance, Mohamed Deif [senior Hamas leader], that we are rising up for this resistance and are ready to preserve it with all our blood. Let's see the scenes from the uprising in Gaza celebrating the resistance's victory.⁴²

73. The IDF seized a file in Gaza containing a 2021 Hamas document that revealed al-Ghoul was a member of the Hamas Nukhba terror unit involved in the October 7 Terrorist Attacks and that he instructed Hamas operatives on how to record the October 7 Terrorist Attacks.⁴³

⁴⁰ <https://x.com/IDF/status/1745177413565223266?lang=en> (last visited on August 26, 2024)

⁴¹ "Al Jazeera refutes 'baseless' Israeli allegations against Ismail al-Ghoul." *Al Jazeera*, 01 Aug. 2024, <https://www.aljazeera.com/news/2024/8/1/al-jazeera-refutes-baseless-israeli-allegations-against-ismail-al-ghoul#:~:text=%E2%80%9Cismail%20joined%20A1%20Jazeera%20in,Media%20Network%20said%20on%20Thursday..>

⁴² <https://www.instagram.com/p/C-Gn4WWSMZ2/> (last visited on September 12, 2024) (video has since been scrubbed from Al Ghoul's Instagram account)

⁴³ IDF Releases File Seized in Gaza to Show Al Jazeera Reporter Was Hamas Member (August 3, 2024), <https://www.timesofisrael.com/idf-releases-file-seized-in-gaza-to-show-al-jazeera-reporter-was-hamas-member/>



A file seized by the IDF in Gaza which the army says shows Al Jazeera reporter Ismail Al-Ghoul was a member of Hamas (IDF)

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74. Al-Ghoul was involved in recording and publicizing the attacks on Israeli troops and his activities were a “vital part” of Hamas’s military activity.⁴⁵

75. The IDF arrested al-Ghoul in March 2024⁴⁶ during its anti-terrorism raid of the Shifa Hospital in Gaza, when the IDF captured some 900 suspects (of whom more than 500 were confirmed to be terror operatives) and killed more than 200 gunmen.⁴⁷

76. In a post on X, al-Ghoul shared a poem and a photograph inciting terror.⁴⁸

77. Al-Ghoul was subsequently released but was assassinated on July 31, 2024 by an IDF airstrike while on an assignment to film near the house of Ismail Haniyeh, the Hamas chief killed in Iran earlier on the same day.

⁴⁴ *Id.*

⁴⁵ Israel Kills An Al Jazeera Journalist And Says, Without Evidence, He Was A Hamas Operative (August 2, 2024), <https://www.reuters.com/world/middle-east/idf-confirms-killing-al-jazeera-journalist-says-he-was-hamas-operative-2024-08-01/>

⁴⁶ Al Jazeera Demands Israeli Occupation Forces Immediately Release Its Correspondent Ismail Alghoul (March 18, 2024), <https://network.aljazeera.net/en/press-releases/al-jazeera-demands-israeli-occupation-forces-immediately-release-its-correspondent>

⁴⁷ IDF Ends Shifa Hospital Raid, Says It Killed 200 Terror Operatives, Arrested 500 More (April 1, 2024), <https://www.timesofisrael.com/idf-ends-shifa-hospital-raid-after-arresting-or-killing-hundreds-of-terror-operatives/>

⁴⁸ https://x.com/ismail_gh2/status/1779247490241270058 (last visited on August 27, 2024)

78. Instead of correcting the record and distancing itself from al-Ghoul, Al Jazeera has, against all evidence to the contrary, defended al-Ghoul’s reputation and denied his role in Hamas.⁴⁹

E. Other Al Jazeera Employees— Hamas and PIJ Terrorists

79. In October 2024, the IDF uncovered documents⁵⁰ in the Gaza Strip that revealed six Al Jazeera journalists acting as operatives for Hamas and the PIJ. The journalists named by the IDF include Anas al-Sharif, Alaa Salameh, Hossam Shabat, Ashraf al-Sarraj, Ismail Abu Omar, and Talal al-Arrouqi.⁵¹ The documents show personnel spreadsheets, lists of training courses, telephone books, and salary documents. They further reveal that Sharif was the head of a rocket launching squad and a member of a Nukhba Force company in Hamas’s Nuseirat Battalion; Salameh was the deputy head of the Shaboura Battalion’s propaganda unit in the PIJ; Shabat was a sniper in Hamas’s Beit Hanoun Battalion; Sarraj was a member of the PIJ’s Bureij Battalion; Omar served as a training company commander in the East Khan Younis Battalion; and Arrouqi was a team commander in Hamas’s Nuseirat Battalion.⁵² According to the IDF, the documents “unequivocally prove” that the journalists functioned as operatives of Hamas and the PIJ. “These documents are proof of the involvement of Hamas terrorists in the Qatari media network, Al-Jazeera,” the IDF said in a statement.⁵³

⁴⁹ <https://www.aljazeera.com/news/2024/8/1/al-jazeera-refutes-baseless-israeli-allegations-against-ismail-al-ghoul>

⁵⁰ <https://videoidf.azureedge.net/e8e85dc1-518d-4e08-b8a5-77576b4dea42> (last visited on October 28, 2024)

⁵¹ IDF Claims Uncovered Documents Prove 6 Al Jazeera Journalists are Hamas, PIJ Operatives (October 23, 2024); https://www.timesofisrael.com/liveblog_entry/idf-claims-uncovered-documents-prove-6-al-jazeera-journalists-are-hamas-pij-operatives/

⁵² *Id.*

⁵³ *Id.*

80. Despite the documents uncovered by the IDF revealing that the named Al Jazeera journalists are operatives for Hamas and the PIJ, Al Jazeera has rejected this evidence and continues to employ these terrorist operatives.⁵⁴

F. History of Terrorists Employed by Defendants

81. Al Jazeera's employment of Hamas operatives dates back several years. Between 2006 and 2011, Wadah Khanfar served as Al Jazeera's Director General.⁵⁵ In 2011, Palestinian media described Khanfar as "one of the senior political leaders of the Islamic Resistance Movement (Hamas)," claiming he headed "Hamas's political bureau in (South and North Africa)."⁵⁶ Khanfar was also described by Palestinian media in 2012 as having been "active in the Hamas movement" and "one of its most prominent leaders" in Hamas's Sudan office.⁵⁷ According to Al Jazeera's former English Egypt Bureau Chief, Mohamed Fahmy, Khanfar also was described by the Muslim Brotherhood's website as "one of the most prominent leaders in the Hamas Office in Sudan."⁵⁸

82. In 2011, Samer Allawi, Al Jazeera's bureau chief in Afghanistan, admitted to working as a Hamas operative from 1993 to 2004. He stated he was prepared to participate in

⁵⁴ Al Jazeera Decries 'Unfounded' Israeli Claims About its Gaza Journalists (October 23, 2024); <https://www.aljazeera.com/news/2024/10/23/al-jazeera-decries-unfounded-israeli-claims-about-its-gaza-journalists>

⁵⁵ Zuckerman, Ethan. "Wadah Khanfar: One Year After Mubarak: The Past & Future of the Arab Spring." *MIT Media Lab Events*, 24 Feb 2012, <https://www.media.mit.edu/events/wadah-khanfar-one-year-after-mubarak-past-and-future-arab-spring/>

⁵⁶ <https://www.raya.ps/news/511931.html>

⁵⁷ <https://www.raya.ps/news/552905.html>

⁵⁸ Fahmy, Mohamed. "The Price of Aljazeera's Politics." *Washington Institute*, 26 Jun. 2015, <https://www.washingtoninstitute.org/policy-analysis/price-aljazeeras-politics>.

military operations if requested by Hamas and offered to leverage his position as a reporter for Al Jazeera to advance Hamas's interests.⁵⁹

83. Hisham Zaqout is an Al Jazeera correspondent with ties to terrorism. In a July 2017 post on his X account, there is a picture of Zaqout wearing an IDF uniform and holding an illegally obtained gun during a training activity in Gaza with the following post: "O educated people, O school students this photo is in Gaza during a creative activity against normalization."⁶⁰ At the time of the post, Zaqout had already begun his role as a correspondent for Al Jazeera, which continues to employ him.⁶¹

G. Al Jazeera's Hiring Process

84. The "Careers" page of the Al Jazeera Media Network website provides "FAQs" for applicants regarding Al Jazeera's hiring policies and practices.⁶²

85. Defendant, Al Jazeera Media Network, uses a variety of selection tools as part of the pre-employment interview process, including as follows:

The interview process is one of our *best opportunities to get to know the potential of a candidate*, and for the candidate to get to know our people and our businesses. We use competency based [sic] interview, psychometric testing and assessment centres [sic] but there are a variety of other selection tools we use where necessary. You will be given details of any assessment when you are invited to interview. You'll be asked questions about your academic and work experiences, and you'll have a chance to ask some questions to us. It will be most helpful for you to know about our Network, in particular the specific position of interest. You should also have a good sense of what value you think you may bring to our business and be

⁵⁹ Al Jazeera Journalist Admits to Being Hamas Operative (September 27, 2011), <https://www.jpost.com/Middle-East/Al-Jazeera-journalist-admits-to-being-Hamas-operative>

⁶⁰ <https://x.com/hishamzaqout/status/890933087558918144> (last visited on August 27, 2024)

⁶¹ <https://ps.linkedin.com/in/hisham-zaqout-60959467>.

⁶² <https://careers.aljazeera.net/faqs/>

prepared to offer examples of your past achievements or successes.⁶³ (emphasis added)

86. Al Jazeera also conducts “background checks of applicants who have accepted employment offers,” as follows:

Yes, Al Jazeera Media Network thorough [sic] background checks of applicants who’ve accepted employment offers. During the background screening process we will cover all or some of the following checks: – Criminal record checks – Employment verifications – Education and credential verifications – Reference verifications – *Local-language media/public domain searches and integrity checking* – Credit reporting and financial histories – Due diligence checking – Compliance and risk database checks – Identity documentation/passport checks If you have specific concerns regarding your background and would like further information please inform your point of contact from our recruitment team.⁶⁴ (emphasis added)

87. Based on its extensive pre-employment interview and screening process and background checks of applicants who have accepted offers, Al Jazeera knew or should have known that it featured openly and publicly identified terrorists among its ranks and that it was compensating these individuals.

88. Furthermore, even after Israel publicly released evidence that Al Jazeera knowingly employed and compensated terrorists, Al Jazeera failed to terminate their employment and continued to compensate known terrorists.

Al Jazeera’s Coordination with Hamas and the PIJ in the October 7 Terrorist Attacks

89. Representative James Comer, Chairman of the House Committee on Oversight and Accountability, sent a letter dated April 8, 2024, to Attorney General Merrick Garland urging him

⁶³ Unlock Your Potential at **Al Jazeera Media Network**, Join our network and discover endless opportunities [sic] in the media industry, <https://careers.aljazeera.net> (last visited on September 23, 2024)

⁶⁴ *Id.*

to bring action against Al Jazeera under the Foreign Agents Registration Act (“FARA”), citing concerns that the network has been “increasingly . . . linked to Hamas-backed attacks.”⁶⁵

90. Prior to October 7, 2023, Hamas kept the details of the October 7 Terrorist Attacks highly secretive, with only five leaders fully aware of the plan and the final decision to proceed made only the day before.⁶⁶ During the early hours of the October 7 Terrorist Attacks, Al Jazeera reporter Ismail Abu Omar (already described previously in this complaint) provided live updates of the terrorist attack on his Telegram channel.⁶⁷ Given the covert nature and last-minute execution of the attack, Omar’s real-time reporting shows close coordination with and intelligence from Hamas.

91. Early in the morning of October 7, 2023, Omar was actively posting on Telegram at 5:58 AM as the invasion unfolded. The Hamas assault on Israel began around 6:22 AM. Omar started sharing coverage of the attacks immediately thereafter, including a photo of rocket launches at 6:31 AM.

⁶⁵ <https://oversight.house.gov/wp-content/uploads/2024/04/2024-04-08-Letter-to-DOJ-FARA-Production-Follow-Up.pdf>

⁶⁶ How Hamas Kept October 7 Attack on Israel Secret – Report (January 10, 2024), <https://www.jpost.com/israel-hamas-war/article-781545>

⁶⁷ Al Jazeera’s Ismail Abu Omar, Ahmad Matar Wounded in Israeli Strike on Gaza (February 13, 2024), <https://www.aljazeera.com/news/2024/2/13/journalists-including-al-jazeera-reporter-injured-in-israel-gaza-strike>



92. The following are some notable real time posts from Omar on October 7, 2023, indicating his active participation in the attacks and close coordination with Hamas:

6:30 AM: “Oh God, the power of missiles and sirens”⁶⁹

6:35 AM: “entering”⁷⁰

6:41 AM: “The smell of gunpowder in #Gaza”⁷¹

6:48 AM: “Young people are riding vehicles inside”⁷²

6:48 AM: “Storming kibbutzim in the Gaza Envelope.”⁷³

6:49 AM: “This is freeing the envelope Allahu Akbar”⁷⁴

6:54 AM: “Grow up and pray for steadfastness for the heroes”⁷⁵

6:59 AM: “Entry to the kibbutzim”⁷⁶

⁶⁸ <https://t.me/asmailpress/76647> (last visited on September 17, 2024)

⁶⁹ <https://t.me/asmailpress/76646> (last visited on September 12, 2024)

⁷⁰ <https://t.me/asmailpress/76651> (last visited on September 12, 2024)

⁷¹ <https://t.me/asmailpress/76652> (last visited on September 12, 2024)

⁷² <https://t.me/asmailpress/76654> (last visited on September 12, 2024)

⁷³ <https://t.me/asmailpress/76655> (last visited on September 12, 2024)

⁷⁴ <https://t.me/asmailpress/76656> (last visited on September 12, 2024)

⁷⁵ <https://t.me/asmailpress/76657> (last visited on September 12, 2024)

⁷⁶ <https://t.me/asmailpress/76661> (last visited on September 12, 2024)

93. Omar later joined the invasion and traveled to Nir Oz accompanied by armed men, where he recorded inciting footage of the horrific scenes.⁷⁷ Videos published by him show him entering Israel on October 7 and riding towards Nir Oz with multiple armed Hamas men.⁷⁸

94. Omar also featured a video of stolen horses, accompanied by the bragging caption “trophy horses.”⁷⁹

95. Omar watermarked a graphic photo of a murdered Israeli soldier whose corpse was brought back to Gaza.



Photo available on Omar’s telegram channel at 8:08 AM, October 7.⁸⁰

96. Omar also watermarked a horrific video at 8:20 am of Hamas members opening a car door, dragging out a corpse of an IDF soldier, stomping on the corpse, wielding guns, and yelling “Allah Akhbar!”⁸¹ The watermark is captioned, “خاص اسماعيل ابو عمر” which translates to “a special/exclusive of Ismail Abu Omar.”

⁷⁷https://t.me/asmailpress/76726?fbclid=IwZXh0bgNhZW0CMTAAR2xBHTv7nxSPsD0w2LnzH69OumCxuj2Lu59LWJ0s2BMAfn7ni93Zt7Chc_aem_AQDVvy2xTCToVNHY73TSZGuRutxQk6yl1dOhmSO7_OTAhpQtj3lL5sPfgIPi9Su4T11luF0_oTfKsaueMJSJNcAB (last visited on August 26, 2024)

⁷⁸https://t.me/asmailpress/76729?fbclid=IwZXh0bgNhZW0CMTAAR16aGVe6BsL8CkAUGkiR6DbAG_IXiEToRPec4xl7MEhQ1sAkPsiDftMdvY_aem_AQAoHlurDTMAQ8GGwE8c-63kWF90z3liFxD52vvmChqePWikU9tkGnzv_aKdAGZL-HFr_d8pe62Mu4bUTMh42dM (last visited on August 26, 2024); <https://t.me/asmailpress/76735> (last visited on August 26, 2024)

⁷⁹ <https://t.me/asmailpress/76727> (last visited on August 26, 2024)

⁸⁰ <https://t.me/asmailpress/76718> (last visited on September 12, 2024)

⁸¹ <https://t.me/asmailpress/76722> (last visited on August 26, 2024)

97. Omar also recorded a jihadist speaking over transistor radio about beheading settlers and asking listeners to praise God. “Praise God, our brothers in the al-Qassam Brigades. We entered the homes of the settlers and beheaded them! We beheaded them with a dagger! And by shooting them in the head! Pray and say: Allahu Akhbar! Praise God!” Omar responded, “Allahu Akbar and Praise God!”⁸²

98. Omar’s early morning October 7 Telegram updates, his active participation in the invasion, and the posting of personally watermarked footage of dead Israeli soldiers all indicate that he had detailed knowledge of the timing and location of the October 7 Terrorist Attacks. This level of knowledge and involvement clearly shows his direct coordination with Hamas. Omar, an Al Jazeera reporter, provided live coverage updates that were framed with explicit support for Hamas, accompanying violent images. These updates were not just reports but were presented in a way that glorified the attacks, encouraging further violence and contributing to the incitement of terrorism on that day.

99. Because of the close coordination between Al Jazeera and Hamas, Israeli Communications Minister Shlomo Karhi initiated emergency regulations a few days following the October 7 Terrorist Attacks to shut down Al Jazeera’s operations in Israel for inciting violence against Israel,⁸³ revealing the staging areas of Israeli forces in southern Israel and Gaza and helping Hamas in the war between Israel and Hamas.⁸⁴

100. Throughout the ensuing war in Gaza following the October 7 Terrorist Attacks, Al Jazeera has had more cameras in Gaza than any other news outlet. “The network’s anchors and reporters have hewn closely to Hamas’s preferred vocabulary for the conflict, speaking about

⁸² [listens](#) (last visited on September 12, 2024)

⁸³ <https://www.jns.org/israeli-government-moves-to-shut-down-al-jazeeras-local-bureau/>

⁸⁴ <https://www.jns.org/mossad-supports-closure-of-al-jazeera-for-revealing-idf-troop-locations/>

‘resistance fighters’ battling against an ‘occupation army.’”⁸⁵ Utilizing Hamas’s terminology, Al Jazeera has significantly spread Hamas’s violent message.

101. In March 2024, Al Jazeera aired a documentary investigating the October 7 Terrorist Attacks which claimed, “many of the worst stories that came out in the days following the attack were false,” featuring commentary from Hamas official Bassem Naim.⁸⁶ Al Jazeera’s broadcasted denial of Hamas’s crimes on October 7, along with its platforming of Naim, legitimized the October 7 Terrorist Attacks, promoted Hamas’s terrorist agenda, and incited further violence.

102. In a January 21, 2025 show on Al-Araby TV, Abu Hamza, the spokesman for the Al-Quds Brigades, the military wing of the PIJ, publicly thanked Al Jazeera, along with all of the media “resistance fighters,” for their collaboration and support following the October 7 Terrorist Attacks with the ensuing war in Gaza. “We salute the free Arab and foreign media outlets, which have made Gaza into their main cause throughout the aggression. Al-Jazeera TV did not flee the scene, despite being harassed and targeted. We salute Al-Jazeera's management, staff, and reporters. We also salute our dear brothers in the resistance-fighting Mayadeen TV, as well as the beloved Palestine Today TV Quds Today TV, Al-Aqsa TV, Al-Manar TV, Al-Araby TV, Alghad TV, Al-Jazeera Live TV, Al-Masirah TV, and all the honorable free media platforms.”⁸⁷

⁸⁵ The Hamas Propaganda War (October 30, 2023), <https://www.newyorker.com/news/news-desk/the-hamas-propaganda-war>

⁸⁶ <https://www.youtube.com/watch?v=Oatzea-mPY&rco=1> (last visited on August 26, 2024)

⁸⁷ <https://www.memri.org/tv/pij-military-wing-spokesman-abu-hamza-ceasefire-deal-thanks-qatar-egypt-arab-media> (last visited on January 27, 2025)

Al Jazeera Extensive Incitement Through Interviews with Terrorist Leaders

103. Al Jazeera has hosted, conducted, and televised interviews with high-ranking members of Hamas and the PIJ on numerous occasions, and continues to do so. These interviews are often conducted in sensitive locations, such as Hamas military bases and tunnels, showing coordination by Al Jazeera and these terrorist organizations. Such interviews help spread Hamas's and the PIJ's terrorist message and agenda.

104. Muhammad El Hindi is the Deputy Secretary General of the PIJ.⁸⁸ In 2019, he was added to the United States list of Specially Designated Global Terrorists.⁸⁹ Muhammad El Hindi has been interviewed by Al Jazeera on numerous occasions.⁹⁰

105. Ismail Haniyeh served as a Hamas leader in the Gaza Strip from June 2007 until February 2017 and then as chairman of the Hamas Political Bureau from May 2017 until his assassination in July 2024.⁹¹ Haniyeh has been interviewed by Al Jazeera on numerous occasions promoting Hamas's terrorist agenda.⁹² In 2022, Al Jazeera interviewed Haniyeh who, during the interview, threatened to abduct additional Israeli soldiers to hold as bargaining chips against Israel.⁹³ In an interview with Al Jazeera in April 2024 regarding the assassinations of Haniyeh's

⁸⁸ Mapping Palestine Politics, https://ecfr.eu/special/mapping_palestinian_politics/muhammad-al-hindi/ (last visited on August 22, 2024).

⁸⁹ Executive Order Amending Counter Terrorism Sanctions Authorities; Counter Terrorism Designations and Designations Updates; Iran-related Designation; Syria Designations Updates, <https://ofac.treasury.gov/recent-actions/20190910> (last visited on August 22, 2024).

⁹⁰ <https://www.facebook.com/watch/?v=1034890781169787> (last visited on August 22, 2024); <https://www.youtube.com/watch?v=UjsbU7goiag> (last visited on August 22, 2024); <https://www.dailymotion.com/video/x8pmysy> (last visited on August 22, 2024).

⁹¹ https://en.wikipedia.org/wiki/Ismail_Haniyeh (last visited on August 22, 2024)

⁹² https://www.youtube.com/watch?v=eQhNQ6-A_o0 (last visited on August 22, 2024); <https://www.youtube.com/watch?v=AIKV5yzrsHE> (last visited on August 22, 2024); https://www.youtube.com/watch?v=U85ao_X4y7w (last visited on August 22, 2024).

⁹³ Al Jazeera Plus Qatar's Foreign Intervention Masked as an American News Outlet (March 2023), <https://zacherlegal.org/wp-content/uploads/2023/03/AJ-Report-2023-WEB-VERSION.pdf>

three children by Israel, Haniyeh stated that “this noble blood that is spilled, including my own children, will harden our resolve, make us more defiant...”⁹⁴ Al Jazeera has also given Haniyeh a platform unrelated to Hamas’s cause,⁹⁵ a strategy likely designed to portray Haniyeh as a normal leader, keeping Hamas’s cause relevant. Since his death, Al Jazeera has referred to Haniyeh as a “martyr.”⁹⁶

106. Khaled Meshaal is a prominent leader of Hamas.⁹⁷ He served as chairman of the Hamas Political Bureau from 1996 until 2017, when he was succeeded by Haniyeh.⁹⁸ After Haniyeh’s assassination in July 2024, Meshaal became the most senior Hamas official outside of the Gaza Strip.⁹⁹ Meshaal has been interviewed by Al Jazeera on several occasions.¹⁰⁰ In a 2017 interview, Al Jazeera spoke with Meshaal regarding the release of Hamas’s new political document, which builds on the 1988 Hamas charter. In that interview, Meshaal, speaking of Hamas, stated that “I am one of the founders of the organization. I was there since day one.”¹⁰¹

107. Ziyad al-Nakhalah became deputy secretary general of the PIJ in 1995, was designated a Specially Designated Terrorist by the U.S. in 2014 and was elected secretary general of the PIJ in 2018. During September 2023, prior to the October 7 Terrorist Attacks, al-Nakhalah met with Hezbollah leader Hassan Nasrallah, Hamas senior leader Saleh al-Arouri, and PFLP

⁹⁴ <https://www.youtube.com/watch?v=jOOdfoh1cG0> (last visited on August 22, 2024)

⁹⁵ https://www.youtube.com/watch?v=2dvmpxWC7_U (last visited on August 26, 2024) (Haniyeh congratulating Algeria on winning the 2019 African Cup.)

⁹⁶ <https://www.facebook.com/aljazeerachannel/videos/820493360230237>

⁹⁷ Hamas: Who are the Group’s Most Prominent Leaders? <https://www.bbc.com/news/world-middle-east-67103298> (last visited on August 22, 2024)

⁹⁸ https://en.wikipedia.org/wiki/Khaled_Mashal (last visited on August 22, 2024)

⁹⁹ <https://www.britannica.com/biography/Khaled-Meshaal> (last visited on August 22, 2024)

¹⁰⁰ https://www.youtube.com/watch?v=jjW_ceXbYNY (last visited on August 22, 2024); https://www.youtube.com/watch?v=gDf_DvTPQgQ (last visited on August 22, 2024)

¹⁰¹ Meshaal: ‘We want to restore our national rights’, <https://www.aljazeera.com/features/2017/5/2/meshaal-we-want-to-restore-our-national-rights> (last visited on August 22, 2024)

deputy secretary-general Jamil Mezher in Lebanon.¹⁰² Ziyad al-Nakhalah has been interviewed by Al Jazeera.¹⁰³ In August 2022, following three days of conflict between Israel and the PIJ in the Gaza Strip, al-Nakhalah gave a press conference praising Al Jazeera, “I would like to welcome the brother, who is a reporter of Al Jazeera, and I would like to salute Al Jazeera, as well as all the TV channels, but especially to Al Jazeera, that broadcast live from Palestine throughout the days of the war . . . The brothers made great efforts, everyone, with no exception, but I would like to specifically mention Al Jazeera for the efforts they made.”¹⁰⁴

108. Yahya Sinwar, designated in 2015 as a terrorist by the U.S. government, was the chairman of the Hamas Political Bureau since August 2024 and the Hamas leader in the Gaza Strip since February 2017 until his assassination in October 2024.¹⁰⁵ Sinwar is regarded as the mastermind behind the October 7 Terrorist Attacks.¹⁰⁶ Sinwar has been interviewed by Al Jazeera on several occasions.¹⁰⁷

¹⁰² https://en.wikipedia.org/wiki/Ziyad_alNakhalah#:~:text=Al%2DNakhalah%20became%20deputy%20secretary,information%20leading%20to%20his%20capture. (last visited on August 22, 2024)

¹⁰³ <https://www.youtube.com/watch?v=C6hzjg8v6y8> (last visited on August 22, 2024); <https://www.youtube.com/watch?v=a4jvIUS1ai8> (last visited on August 22, 2024)

¹⁰⁴ Palestinian Islamic Jihad Leader Ziyad al-Nakhalah In Tehran Press Conference: The Enemy Has Conceded To Our Demand To Release The Two PIJ Leaders; I Salute Al-Jazeera For Its Coverage Of The War (August 7, 2022),

<https://www.memri.org/tv/pij-palestine-leader-ziyad-nakhala-tehran-presser-enemy-agreed-release-leaders-salute-jazeera>

¹⁰⁵ https://en.wikipedia.org/wiki/Yahya_Sinwar (last visited on November 4, 2024)

¹⁰⁶ Shadowy Hamas leader in Gaza is at top of Israel’s hit list after last month’s deadly attack (November 22, 2023),

<https://apnews.com/article/israel-hamas-leader-gaza-war-sinwar-7359ae98217aa11aa7c20c2780d5d350>

¹⁰⁷ <https://www.youtube.com/watch?v=j3Rc-yGhxGw> (last visited on August 22, 2024)

109. Khalil al-Hayya is a Hamas official in the Palestinian Legislative Council and deputy chairman of the Hamas Political Bureau.¹⁰⁸ He has also been interviewed by Al Jazeera.¹⁰⁹ In an interview with Al Jazeera on August 10, 2024, al-Hayya called for violent incitement, demanding “a serious Arab and Islamic response to punish the Israeli occupation.”¹¹⁰

110. Hassan Yousef is a co-founder and leader of Hamas.¹¹¹ He has been interviewed by Al Jazeera as well.¹¹²

111. Al Jazeera often conducted interviews with operatives in Hamas and the PIJ in sensitive locations, signifying their close coordination. On one occasion, an Al Jazeera reporter interviewed a spokesperson from the PIJ outside the Al Shifa Hospital in Gaza.¹¹³ The hospital was later discovered to have served as a Hamas command center where 500 terrorists affiliated with Hamas and the PIJ were arrested.¹¹⁴ On other occasions, Al Jazeera interviewed an operative from the PIJ on a PIJ base¹¹⁵ and a Hamas operative in Hamas’s terror tunnels in Gaza,¹¹⁶ sensitive locations to which access is limited to those in close coordination with these terrorist groups.

112. The spiritual leader of Hamas’s predecessor—the Muslim Brotherhood—Yusuf al-Qaradawi, who died in 2022, legitimized Palestinian terrorism, including suicide bombings and

¹⁰⁸ https://en.wikipedia.org/wiki/Khalil_al-Hayya (last visited on August 22, 2024)

¹⁰⁹ <https://www.youtube.com/watch?v=kMMOsCBi48w> (last visited on August 22, 2024); <https://www.facebook.com/watch/?v=1390150138330157> (last visited on August 22, 2024)

¹¹⁰ Hamas official Khalil al-Hayya to Al Jazeera: What Is Required Is A Serious Arab And Islamic Response To Punish The Israeli Occupation (August 10, 2024), <https://www.lbcgroup.tv/news/israelgazawar/789271/hamas-official-khalil-al-hayya-to-al-jazeera-what-is-required-is-a-ser/en>

¹¹¹ [https://en.wikipedia.org/wiki/Hassan_Yousef_\(Hamas_leader\)](https://en.wikipedia.org/wiki/Hassan_Yousef_(Hamas_leader)) (last visited on August 22, 2024)

¹¹² <https://www.youtube.com/watch?v=5s9tG3BGQMU> (last visited on August 22, 2024); <https://www.dailymotion.com/video/xsywi2> (last visited on August 22, 2024)

¹¹³ <https://www.youtube.com/watch?v=0d2V9gebrME> (last visited on August 26, 2024)

¹¹⁴ Gaza’s Al-Shifa Hospital In Ruins After Two-Week Israeli Raid (April 1, 2024), <https://www.bbc.com/news/world-middle-east-68705765>

¹¹⁵ <https://www.youtube.com/watch?v=Ifo7q6oVHsU&t=77s> (last visited on August 26, 2024)

¹¹⁶ <https://www.youtube.com/watch?v=h2RcScifC6Y&t=137s> (last visited on August 26, 2024)

the killings of Israeli women and children. Yusuf al-Qaradawi had a popular weekly prime-time television show on Al Jazeera, *al-Shari'a wa-l-Hayah (The Sharia and Life)*, which, at its peak, was one of Al Jazeera's most popular shows with tens of millions of viewers.¹¹⁷ On the program, al-Qaradawi advocated for terrorist attacks on U.S. soldiers in Iraq, promoted Jihad against the West, and praised the Holocaust and attacks on Israeli civilians.¹¹⁸ On one of his Al Jazeera shows, al-Qaradawi praised Hitler and hoped that he would become a martyr before he died.¹¹⁹

113. In May 2021, Al Jazeera interviewed members of the al-Qassam Brigades (the military wing of Hamas) while being escorted by them through a Hamas tunnel.¹²⁰ In May 2023, Al Jazeera interviewed a spokesman from Saraya al-Quds (the military wing of the PIJ).¹²¹

114. At the 9th annual Al Jazeera forum in 2015, Al Jazeera hosted Osama Hamdan, Head of the International Relations Department of Hamas, on a panel discussion.¹²² Hamdan was a former senior representative of Hamas in Lebanon and Tehran.¹²³ Hamdan was also interviewed on Al Jazeera's Washington, D.C.-based show *Upfront*, in 2017¹²⁴ and in 2023,¹²⁵ and likely compensated from the Washington, D.C.-based show for the interviews.

¹¹⁷ Yusuf al-Qaradawi, *The Muslim Scholar Who Influenced Millions* (September 27, 2022), <https://www.aljazeera.com/news/2022/9/27/yusuf-al-qaradawi-the-muslim-scholar-who-influenced-millions>

¹¹⁸ Al Jazeera Plus Qatar's Foreign Intervention Masked as an American News Outlet (March 2023), <https://zachorlegal.org/wp-content/uploads/2023/03/AJ-Report-2023-WEB-VERSION.pdf>

¹¹⁹ *Ibid.*

¹²⁰ <https://www.youtube.com/watch?v=h2RcScifC6Y&t=137s> (last visited on August 22, 2024)

¹²¹ <https://www.youtube.com/watch?v=0d2V9gebrME> (last visited on September 24, 2024)

¹²² The 9th AL Jazeera forum, Programme, <https://forum.aljazeera.net/archive/forum-2015/programme.html>, <https://archive-forum.aljazeera.net/forum-2015/media/photos/first-day-9th-aljazeera-forum> (see photograph 19/20 confirming his attendance)

¹²³ https://en.wikipedia.org/wiki/Osama_Hamdan (last visited on September 30, 2024)

¹²⁴ Senior Hamas Leader Speaks to Al Jazeera on Moving the US Embassy to Jerusalem (January 25, 2017), <https://network.aljazeera.net/en/pressroom/senior-hamas-leader-speaks-al-jazeera-moving-us-embassy-jerusalem>

¹²⁵ <https://www.youtube.com/watch?v=vkeaiNCQukg>

115. At its recent forum in May 2024, featured speakers included, Ismail Abu Omar,¹²⁶ even after he was identified as a Hamas terror operative, and Wadah Khanfar,¹²⁷ who was described as a prominent leader in Hamas.¹²⁸

116. Al Jazeera organized an international conference in collaboration with the European Palestinian Council for Political Relations (“EUPAC”) scheduled for October 14, 2024, in Brussels, titled “The Genocidal War in Gaza One Year On: Humanitarian, Legal and Political Implications in the European Context.” EUPAC, under the leadership of chairman Majed Al-Zeer and deputy chairman Mohammad Hannoun—both designated by the U.S. Treasury as Hamas officials¹²⁹—organized the event with Al Jazeera. These individuals have been recognized for raising millions of dollars for Hamas.¹³⁰ The conference was canceled by the venue’s website following the designation by the U.S. Treasury.¹³¹

117. Al Jazeera reportedly customarily pays interviewees a fee for appearing on its channels and even provides transportation for in-studio interviews.¹³² Al Jazeera also reportedly

¹²⁶ Transformations in the Middle East after Tufan Al-Aqsa, Program, <https://forum.aljazeera.net/en/programme/>

¹²⁷ *Id.*

¹²⁸ The Price of Aljazeera’s Politics (June 26, 2015), <https://www.washingtoninstitute.org/policy-analysis/price-aljazeeras-politics>

¹²⁹ Treasury Targets Significant International Hamas Fundraising Network (October 7, 2024), <https://home.treasury.gov/news/press-releases/jy2632>

¹³⁰ *Id.*

¹³¹ Brussels Venue De-Platforms Al-Jazeera-Funded Conference Over Hamas Leader Participation (October 10, 2024), https://www.jpost.com/international/article-824134#google_vignette

¹³² Who Gets Paid for Interviews? (March 25, 2019) <https://medium.com/news-to-table/who-gets-paid-for-interviews-e16650567679>, Ethics Disclosure, Jeffrey Frankel, May 2023, https://scholar.harvard.edu/sites/scholar.harvard.edu/files/frankel/files/ethicsdisclosure_2023.pdf

covers the travel expenses of invited speakers to attend its annual forum.¹³³ Furthermore, Al Jazeera helps fund various conferences and forums.

118. Al Jazeera provides financial support to terrorists, constituting material support for terrorism by paying terrorist leaders for their appearances, covering travel expenses, and funding conferences where terrorist leaders speak.

119. Al Jazeera facilitates incitement to violence by offering a platform for these terrorist leaders to promote their terrorist agenda, to organize, and to recruit members.

Al Jazeera's Incitement and Glorification of Terrorism

120. Al Jazeera often glorifies Hamas, the PIJ, and other terrorist groups by referring to their deceased members as "martyrs."

121. Al Jazeera titled a broadcasted tribute to assassinated Saleh Al Arouri, Hamas's Deputy Chairman, "Hamas announced his martyrdom in Beirut. . .Who is the martyr Saleh Al-Arouri?"¹³⁴

122. Al Jazeera described a memorial to Yahya Ayyash, Hamas's notorious former chief bomb maker,¹³⁵ as "[T]he anniversary of the martyrdom of Al-Qassam Brigades leader Yahya Ayyash."¹³⁶

¹³³ Blogging Al Jazeera – A dilemma? Or a critic's agenda? (March 15, 2006) <https://ethanzuckerman.com/2006/03/15/blogging-al-jazeera-a-dilemma-or-a-critics-agenda/>

¹³⁴ <https://www.youtube.com/watch?v=EQexwWzGyNE> (last visited on August 22, 2024)

¹³⁵ Right-Hand Man To Infamous Hamas Bomb-Maker Ayyash Killed In Gaza, Palestinians Say (December 31, 2023), https://www.timesofisrael.com/liveblog_entry/right-hand-man-to-infamous-hamas-bomb-maker-ayyash-killed-in-gaza-palestinians-say/

¹³⁶ https://www.youtube.com/watch?v=iMX_VfIq5U8 (last visited on August 22, 2024)

123. Al Jazeera titled two separate videos memorializing Sheikh Ahmed Yassin, a founder of Hamas: “15 years since the martyrdom of Sheikh Ahmed Yassin”¹³⁷ and “The martyrdom of Sheikh Ahmed Yassin.”¹³⁸

124. Al Jazeera titled the broadcasted funeral of two al-Qassam Brigade Hamas members, “A solemn scene of the funeral of two martyrs from the Qassam Brigades, in the presence of Ismail Haniyeh.”¹³⁹

125. In separate features, Al Jazeera refers to Ali Ghali and Jihad Ghanam, both commanders of the PIJ, as martyrs.¹⁴⁰ The title of a broadcasted funeral of a member of the PIJ military wing, Al-Quds Brigades, televised by Al Jazeera, was “The funeral of a member of the Al-Quds Brigades [Saraya Al Quds], who was martyred today in the occupation bombing of Khan Yunis.”¹⁴¹

126. On multiple occasions in the current Israel-Hamas war in Gaza, Al Jazeera has shared Hamas videos of Hamas terrorists targeting IDF troops. The videos are sourced from Hamas, indicating their close coordination. One Facebook video Al Jazeera posted is captioned, “It includes destroying an Israeli tank from zero distance, targeting soldiers, and seizing weapons. . . Scenes obtained by Al Jazeera from what the Qassam Brigades [Hamas military wing] said were battles against the occupation army in Gaza City.”¹⁴²

¹³⁷ https://www.youtube.com/watch?v=DGVZ4_aJxdo (last visited on August 22, 2024)

¹³⁸ <https://www.youtube.com/watch?v=IYY9wsmgRgc> (last visited on August 22, 2024)

¹³⁹ https://www.youtube.com/watch?v=d3RlbZ9_960 (last visited on August 22, 2024)

¹⁴⁰ <https://www.aljazeera.net/politics/2023/5/11/رابع-مسؤول-عسكري-يتم-اغتياله-خلال> (last visited on August 22, 2024); <https://www.aljazeera.net/videos/2023/5/10/تعرف-على-السيرة-الذاتية-للمشيد-جهاد> (last visited on August 22, 2024)


¹⁴¹ <https://www.youtube.com/watch?v=siBppeCnWeE> (last visited on August 22, 2024)

¹⁴² <https://www.facebook.com/watch/?v=1520950348736846> (last visited on August 25, 2024)

127. The logo for the “Al-Aqsa Flood,” the term used by Hamas to describe their large-scale military operation against Israel, which began with the October 7 Terrorist Attacks, appears in the beginning of many Al Jazeera videos.¹⁴³

128. Anas al-Sharif is an Al Jazeera news reporter (as mentioned previously in this complaint).¹⁴⁴ There are several posts on his Telegram account from October 7, 2023, where al-Sharif incites violence by praising and glorifying the attacks:

October 7, 2023: “Allahu Akbar and [Thank God]”¹⁴⁵

October 7, 2023: “9 hours later and the heroes are still roaming around the country, killing and capturing... God, God, how great you are .”¹⁴⁶

October 7, 2023: “God is great God is great Thousands of settlers fled from the Gaza Strip”¹⁴⁷

October 7, 2023: “It is a jihad, a jihad of victory and martyrdom”¹⁴⁸

¹⁴³<https://www.facebook.com/aljazeerachannel/posts/pfbid02xCphUTvgeARjsdF2G4qQRojhYL2iAFp12h7oabYDqW1YkRruKmo93qtvKpubc3VV1> (last visited on August 25, 2024); <https://www.facebook.com/watch/?v=6761749743952856> (last visited on August 25, 2024); <https://www.facebook.com/watch/?v=551825507166222> (last visited on August 25, 2024); <https://www.facebook.com/watch/?v=731927248429313> (last visited on August 25, 2024)

¹⁴⁴ https://x.com/AnasAlSharif0?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwtgr%5Eauthor (last visited on August 27, 2024)

¹⁴⁵ https://t.me/anas1020304050/22133?fbclid=IwY2xjawDwih9leHRuA2FlbQIxMAABHeABLNfeoYb2JcgLzgzkdhdQvR88wEnxdSoTdLyGFIEGEA7IMhaxlW7Mw_aem_ShczQlu8zL7RYUPXKGSPCg (last visited on August 27, 2024)

¹⁴⁶ https://t.me/anas1020304050/22098?fbclid=IwY2xjawDwipRleHRuA2FlbQIxMAABHbeOrgj7SIR6uCnLiuAOIeTo9iEdWr1YQo1L5oyhYaKlHscGnTQD-uZrmw_aem_3Sx4ki0wbH6D8m0hrNRzjg (last visited on August 27, 2024)

¹⁴⁷ https://t.me/anas1020304050/22071?fbclid=IwY2xjawDwjV1leHRuA2FlbQIxMAABHQAh84CegahprnT1YQp4869BCQw9PFU5hDIwBc1MB5xVswGmWbHWr40i-A_aem_ZFQSV6t2TYXflge3iRyqqg (last visited on August 27, 2024)

¹⁴⁸ <https://t.me/anas1020304050/22039?fbclid=IwY2xjawDwje9leHRuA2FlbQIxMAABHXGBnEGaTQ4hKzduUb-eFD->

October 7, 2023: “Pictures of dead members of the occupation army inside their military barracks in settlements and sites in the eastern Gaza Strip”¹⁴⁹



October 09, 2023: Al-Sharif praises a Hamas terrorist:



[XNDwxflk18NLNz1KzpGTGzU23YKiCR172WA_aem_ItUPUe2vBEmuurjHU7qM7A](https://t.me/anas1020304050/22045?single&fbclid=IwY2xjawDwjaZleHRuA2FlbQIxMAABHYHktlEoXQa4z6ncJrsnDCVvx70k1nRwTzpRCBsse4lMHJu1j4LqjSgIzw_aem_b6nIEFhwNr3ZUEsmRt18qA) (last visited on August 27, 2024)

¹⁴⁹https://t.me/anas1020304050/22045?single&fbclid=IwY2xjawDwjaZleHRuA2FlbQIxMAABHYHktlEoXQa4z6ncJrsnDCVvx70k1nRwTzpRCBsse4lMHJu1j4LqjSgIzw_aem_b6nIEFhwNr3ZUEsmRt18qA (last visited on August 27, 2024)

¹⁵⁰ *Ibid.*

“The brave, heroic martyr who defeated the occupation soldiers and claimed the dead, wounded, and prisoners among them: Salah Labad.”¹⁵¹

October 10, 2023: “#Ashdod is 40 kilometers from the Gaza Strip. There was a resistance raid there In God’s protection and care 🌟❤️PS”¹⁵²

October 11 and October 26, 2023: Al-Sharif posts violent pictures of dead Israeli soldiers being stepped on:



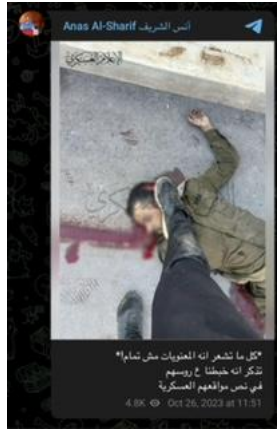
“The army wants to exterminate people under their rugs 😊🔥”¹⁵³

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https://t.me/anas1020304050/22697?fbclid=IwY2xjawDwiRRleHRuA2FlbQIxMAABHZh1U1q9V2-FI93N-nv8zDb47pjf3rkzqDPKXS6zIqzUDfUhoPSV2sLg8w_aem_F86N71ynjl0TiLNFH5wRYQ (last visited on August 27, 2024)

¹⁵²https://t.me/anas1020304050/23408?fbclid=IwY2xjawDwiMlleHRuA2FlbQIxMAABHf19YZe0vHT2qAh2kXncqGQWOAOEsYIOMmxmru0Evxy1O05Dn8FmNPd_yA_aem_ycHICl_rYpaW1souVZNog (last visited on August 27, 2024)

¹⁵³https://t.me/anas1020304050/23823?fbclid=IwY2xjawDwhTxleHRuA2FlbQIxMAABHVP1Xkplg2gOW4je2tYmAnMB7wukRCf0joQCDYedzJSGmNewUHRVdrqyw_aem_rOZkyZKOj3OUhOOxgSb8Dw (last visited on August 27, 2024)



“All you feel is that morale is not perfect! Remember, we hit their heads...”¹⁵⁴

October 11, 2023 (mourning the deaths of Hamas leaders): “May God have mercy on him and please him. The great leader, Hajj Zakaria Abu Muammar (Abu Ahmed) Member of the movement’s political bureau - Khan Yunis And the great leader, Hajj Jawad Abu Shamala Head of the movement’s economic department.”¹⁵⁵

October 30, 2023: “A special video from the heart of the battle that our mujahideen are waging with the enemy’s fortified tanks and vehicles. This hero comes out to them despite the intensity of the fire and the burning of the earth with shells and missiles. Perhaps this lion came out to them after waiting for prey for days. These are our heroes. May God protect them and strike them.”¹⁵⁶

¹⁵⁴ <https://t.me/anas1020304050/25082> (last visited on August 27, 2024)

¹⁵⁵ <https://t.me/anas1020304050/23629?single> (last visited on August 27, 2024)

¹⁵⁶ https://t.me/anas1020304050/25460?fbclid=IwY2xjawDwg9RleHRuA2FlbQIxMAABHeawxgoVrHZ2FFa82y1_7Ve06iSipcXdzgn5EXYB7YfOeka5r7iruJZapw_aem_rpO2VZMpKQVS-uwmKg7RzQ (last visited on August 27, 2024)

November 2, 2023: Al-Sharif prays for the Hamas fighters, “You will not forget the Mujahideen in your prayers PS ❤️”¹⁵⁷ and praises Hamas as one of his own, “Our servants are men of great might. ❤️”¹⁵⁸

129. Even prior to the October 7 Terrorist Attacks, Al-Sharif glorified Hamas by posting pictures on his Telegram account of Hamas terrorists and referring to them as martyrs.¹⁵⁹

130. The IDF has uncovered documents in the Gaza Strip revealing that Al Jazeera journalist Sharif is a Hamas operative, head of a rocket launching squad, and a member of a Nukhba Force company in Hamas’s Nuseirat Battalion.¹⁶⁰

131. Hisham Zaqout is an Al Jazeera correspondent (as mentioned previously in this complaint).¹⁶¹ He has incited violence on social media, often referring to terrorists who have perpetrated attacks as “martyrs.”¹⁶² In a July 2019 X post, Zaqout shared a picture of a man who diverted millions of dollars to Hamas and wrote, “Freedom for Muhammad Al-Halabi and for *our*

¹⁵⁷ <https://t.me/anas1020304050/25542> (last visited on September 24, 2024)

¹⁵⁸ <https://t.me/anas1020304050/25731> (last visited on August 27, 2024)

¹⁵⁹ https://t.me/anas1020304050/19318?fbclid=IwY2xjawDwjrlJeHRuA2FlbQIxMAABHQAh84CegahprnT1YQp4869BCQw9PFU5hDIwBc1MB5xVswGmWbHWr40i-A_aem_ZFQSV6t2TYXflge3iRyqqg (last visited on August 27, 2024); https://t.me/anas1020304050/21969?single&fbclid=IwY2xjawDwjrvleHRuA2FlbQIxMAABHska7EJ8JEBhFPnyrTNBbQdhvhnwk0nkRw88IR7HNrAq6oqejJg1ArPvOg_aem_YxvtSeh4J7rsDwv_UgMK4w (last visited on August 27, 2024)

¹⁶⁰ IDF Claims Uncovered Documents Prove 6 Al Jazeera Journalists are Hamas, PIJ Operatives (October 23, 2024); https://www.timesofisrael.com/liveblog_entry/idf-claims-uncovered-documents-prove-6-al-jazeera-journalists-are-hamas-pij-operatives/

¹⁶¹ <https://ps.linkedin.com/in/hisham-zaqout-60959467> (last visited on August 27, 2024)

¹⁶² <https://x.com/hishamzaqout/status/1151865377569333248> (last visited on August 27, 2024); <https://x.com/hishamzaqout/status/1170723010275401728> (last visited on August 27, 2024); <https://www.instagram.com/p/CZufvbqkFvY/> (last visited on August 27, 2024); <https://x.com/hishamzaqout/status/987751946013507586> (last visited on August 27, 2024) (referring to a Hamas commander and engineer as a martyr)

brave prisoners in the occupation prisons.”¹⁶³ (emphasis added). In July 2017, Zaqout posted a video on his Instagram account featuring the al- Qassam Brigades in the Hamas tunnels in Gaza, further glorifying violent actions.¹⁶⁴

132. Rami Saleim is an Al Jazeera correspondent who has similarly glorified Hamas and the PIJ on his social media accounts.¹⁶⁵ Despite this, Al Jazeera appears to have hired him within the last year.¹⁶⁶



“Together we sacrifice. Together we win”¹⁶⁷

133. Ashraf Amra works for Al Jazeera¹⁶⁸ and has posted images of youths in Gaza with weapons, captioning the post: “Liberation Youth Camps in Gaza.”¹⁶⁹ In a 2017 Instagram

¹⁶³ <https://x.com/hishamzaqout/status/1148612096885690369> (last visited on August 27, 2024)

¹⁶⁴ <https://www.instagram.com/p/CPtgik6pDvn/> (last visited on August 27, 2024)

¹⁶⁵ <https://www.instagram.com/p/CjEAnCgKqdv/> (last visited on August 27, 2024); <https://www.instagram.com/p/CiQqcS8DWNE/> (last visited on August 27, 2024) (Referring to a movie that depicts Israel’s destruction as a “work of art”)

¹⁶⁶ https://www.instagram.com/rami_saleim/ (last visited on September 24, 2024)

¹⁶⁷ <https://www.instagram.com/p/CPAplH2HpKL/> (last visited on August 27, 2024)

¹⁶⁸ Better Than A Tent: The Gaza Family Living In Ruins Of Their Bombed Home (November 20, 2023),

<https://www.aljazeera.com/features/2023/11/20/better-than-a-tent-the-family-living-in-ruins-of-their-home-in-gaza> (see byline)

¹⁶⁹ <https://www.instagram.com/p/5sYaVzwWbD/?hl=en> (last visited on August 27, 2024); <https://www.instagram.com/p/5sYMwwQWao/?hl=en> (last visited on August 27, 2024); <https://www.instagram.com/p/5sYXKIwWa4/?hl=en> (last visited on August 27, 2024)

photograph of fighters from the PIJ, he refers to them as “Resistance.”¹⁷⁰ Amra has also photographed Hamas launching incendiary balloons from Gaza into Israel¹⁷¹ and documented terrorists during training drills. His apparent high standing with Hamas is evident through his close proximity to Sinwar, the former Hamas leader, and his ability to get Sinwar to pose for multiple photos.¹⁷² He shared the following photo on Instagram of members of the al-Qassam Brigades taking part in a military drill in Gaza:



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134. Youmna El Sayed is an Al Jazeera English Correspondent. In April 2022, she broadcasted from a terrorist press conference for the PIJ, amplifying its violent and terrorist

¹⁷⁰ <https://www.instagram.com/p/BXnVdmtAlhg/?hl=en> (last visited on August 27, 2024)

¹⁷¹ https://www.instagram.com/p/CBVbUHsJtdz/?hl=en&img_index=1 (last visited on August 27, 2024); https://www.instagram.com/p/CTZzdSGNsGE/?hl=en&img_index=1 (last visited on August 27, 2024)

¹⁷² https://www.instagram.com/p/CPggHfvHR6i/?hl=en&img_index=6; (last visited on September 24, 2024) https://www.instagram.com/p/CPggHfvHR6i/?hl=en&img_index=10 (last visited on September 24, 2024)

¹⁷³ <https://www.instagram.com/p/BgWH0vGBN62/?hl=en> (last visited on August 27, 2024); see also PFLP photos <https://www.instagram.com/p/BdCwAqGBxGS/?hl=en> (last visited on August 27, 2024) and <https://www.instagram.com/p/Bdz1VlIBbuG/?hl=en> (last visited on August 27, 2024)

messaging.¹⁷⁴ On the morning of October 8, 2023, following the October 7 Terrorist Attacks, she posted on her X account, “It’s been such an extraordinary day! This is all I could post from yesterday’s coverage, please do follow me for more updates on Al Jazeera English.”¹⁷⁵

135. Hind Osama Al Khoudary has been reporting for Al Jazeera since October 7, 2023.¹⁷⁶ She had previously revealed her alignment with Hamas on social media, yet Al Jazeera still hired her.



“When we say #WeStandWithTheResistance, it means that we support its decisions in starting war, defense, or maintaining calm. We trust it because it knows the field conditions better than us, and it has never let us down before. We witness that it has returned stronger each time despite the blockade of its supplies, the assassination of its leaders, and attacks from sharp-tongued critics and those of short patience. #Gaza”¹⁷⁷

Despite Khoudary’s overt alignment with Hamas shared publicly on May 12, 2023, Al Jazeera employed her months later, raising serious concerns about its hiring, employment, and screening practices regarding individuals who promote violence.

¹⁷⁴ <https://x.com/YoumnaElSayed17/status/1520212744103989250> (last visited on August 27, 2024)

¹⁷⁵ <https://x.com/YoumnaElSayed17/status/1710942027368591522> (last visited on August 27, 2024)

¹⁷⁶ https://en.wikipedia.org/wiki/Hind_Khoudary (last visited on August 27, 2024)

¹⁷⁷ <https://x.com/EFischberger/status/1775915905194619046> (last visited on August 27, 2024)

136. Further revealing its penchant for inciting and glorifying terrorism, Al Jazeera frequently publishes Hamas videos of terrorist attacks before any official versions are released, thereby glorifying these acts of violence and inciting further support for Hamas's violent agenda.¹⁷⁸

137. Al Jazeera anchorman Jamal Rayyan, considered one of the network's icons, joined Al Jazeera in 1996.¹⁷⁹ On the first anniversary of the October 7 Terrorist Attacks, Rayyan posted on his X account in support of the "resistance" and urged Arab countries to back it, even if done "secretly."¹⁸⁰ He pinned an image on his account showing rockets, resembling fireworks, launching from the Dome of the Rock in Jerusalem, with a glowing number 7 in the center, celebrating the October 7 Terrorist Attacks. In the caption, Rayyan wrote, "This is the day that restored the nation's dignity and prestige."¹⁸¹

138. Also, on the first anniversary of the October 7 Terrorist Attacks, Al Jazeera aired a so-called "comedic" sketch on its streaming platform, Al Jazeera 360, which mocked the October 7 Terrorist Attacks and trivialized the violence. In the sketch, Hamas terrorists are depicted as non-violent, breaking into an Israeli base and gently abducting an Israeli soldier. The soldier offers no resistance and instead addresses the camera, discussing a fictional "Apricot Dome" defense

¹⁷⁸ <https://x.com/JoeTruzman/status/1782063141511385194> (last visited on August 26, 2024) (Showing footage obtained by Al-Jazeera of a shooting attack carried out by members of Hamas in the West Bank.)

¹⁷⁹ <https://network.aljazeera.net/en/profile/presenters/jamal-rayyan> (last visited on October 7, 2024)

¹⁸⁰ Senior Al Jazeera Anchor Hails Oct. 7 Massacre as 'day that restored nation's dignity' (October 7, 2024), https://www.timesofisrael.com/liveblog_entry/senior-al-jazeera-anchor-hails-oct-7-massacre-as-day-that-restored-nations-dignity/

¹⁸¹ *Id.*

system.¹⁸² By making a mockery of the attacks, Al Jazeera downplayed the brutality of Hamas and undermined the gravity of the violence inflicted during the October 7 Terrorist Attacks.

139. Since the October 7 Terrorist Attacks, Al Jazeera has promoted Hamas by censoring and silencing Gazan criticism of Hamas. Al Jazeera reporters often cut off interviews and broadcasts, dismissing contrary opinions when Gazan citizens criticize Hamas.¹⁸³ This selective reporting not only incites support for Hamas but also reinforces a narrative that stifles dissent and legitimizes extremist actions. “Al Jazeera’s reluctance to broadcast criticism of Hamas may be seen as part of this alliance between the Qatari mouthpiece and the terrorist group.”¹⁸⁴

140. During a November 5, 2023 live broadcast on Al Jazeera Network (Qatar) from Gaza, an elderly wounded man criticized Hamas for hiding among the civilian population. He said, “As for the resistance – they come and hide among the people. Why are they hiding among the people? They can go to Hell and hide there.” Al Jazeera reporter Ashraf Abu Amra immediately cut off the man’s criticism of Hamas, and the man kicked him.¹⁸⁵ Ashraf Abu Amra continues to work for Al Jazeera.¹⁸⁶

141. During an Al Jazeera interview on January 27, 2025 with a Palestinian returning to northern Gaza following the ceasefire agreement between Israel and Hamas, the Al Jazeera

¹⁸²https://x.com/EFischberger/status/1841925333408195001?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1841925333408195001%7Ctwgr%5E4e8b4eeb284606cfda49f3f8fedb69ac98d07284%7Ctwcon%5Es1_&ref_url=https%3A%2F%2Fwww.jpost.com%2Fomg%2Farticle-823209 (last visited on October 9, 2024)

¹⁸³ *Ibid.* See also <https://www.memri.org/tv/elderly-wounded-man-gaza-hospital-criticize-hamas-kicks-jazeera-reporter> (last visited on August 28, 2024)

¹⁸⁴ *Ibid.*

¹⁸⁵ <https://www.memri.org/tv/elderly-wounded-man-gaza-hospital-criticize-hamas-kicks-jazeera-reporter> (last visited on August 28, 2024)

¹⁸⁶ https://www.instagram.com/p/C_KrZHCtxnB/?hl=en (last visited on September 24, 2024)

reporter cut off the man when he started criticizing Hamas. Before being cut off, the man can be heard telling the Al Jazeera reporter that hopefully Hamas-backed thieves did not loot his house.¹⁸⁷

142. Materials seized by the IDF, the Shin Bet, and the IDF Intelligence Directorate contain a series of internal documents exchanged between Hamas operatives in Gaza and producers at Al Jazeera exposing direct communication between senior Hamas officials in Gaza and Al Jazeera producers. On January 24, 2025, Al Jazeera aired a special episode of its investigative program *What Is Hidden Is Greater* (ما خفي أعظم), focusing on the October 7 Attacks from the perspective of Hamas's military wing. Al Jazeera used the broadcast to reinforce and legitimize Hamas's actions on October 7 as a justified military operation.¹⁸⁸

Historical Bans on Al Jazeera for Incitement to Violence

143. Historically, several countries have taken steps to block or restrict Al Jazeera due to its ties with terrorist organizations. For example:

In 2008, Israel imposed sanctions on Al Jazeera, accusing it of inciting violence through its support for Hamas. Israel's deputy foreign minister, Majalli Whbee, said, "We have seen that Al-Jazeera has become part of Hamas . . . taking sides and cooperating with people who are enemies of the state of Israel."¹⁸⁹

¹⁸⁷ Widely Shared Clip Shows Al Jazeera Cutting Off Palestinian Criticizing Hamas (January 28, 2025) https://www.timesofisrael.com/liveblog_entry/widely-shared-clip-shows-al-jazeera-cutting-off-palestinian-criticizing-hamas/

¹⁸⁸ Inside Hamas' Propaganda Machine: How Al Jazeera Aided October 7 Misinformation (February 13, 2025) <https://www.jpost.com/middle-east/article-842041>

¹⁸⁹ Israel to Impose Sanctions on Arab TV Station Al-Jazeera (Published March 12, 2008, Updated January 14, 2015), <https://www.foxnews.com/story/israel-to-impose-sanctions-on-arab-tv-station-al-jazeera>

In 2013, Egypt banned Al Jazeera, accusing it of supporting the Muslim Brotherhood.¹⁹⁰

In 2017, Al Jazeera was banned in Saudi Arabia when Saudi Arabia cut ties with Qatar, accusing it of supporting terrorism and promoting regional unrest through Al Jazeera.¹⁹¹

In connection with the 2017 boycott of Qatar, Saudi Arabia, the United Arab Emirates, Bahrain, and Egypt sent Qatar a demand to shut down Al Jazeera.¹⁹²

Israel and Jordan also joined in the 2017 boycott of Al Jazeera.¹⁹³

In 2017, Egypt blocked Al Jazeera because it was “supporting terrorism.”¹⁹⁴

“Al Jazeera’s reporting has previously drawn accusations of inciting terrorism from the governments of Saudi Arabia, Egypt, the United Arab Emirates, and Bahrain.”¹⁹⁵

144. A report by a team of U.S. and Israeli intelligence professionals regarding Qatar’s facilitation of the October 7 Terrorist Attacks contends that “Qatar’s influential Al Jazeera Network not only maintains an editorial policy backing these outlawed groups, but it also provides

¹⁹⁰ Egyptian Court Orders Closure of Al-Jazeera Affiliate (September 3, 2013) <https://www.theguardian.com/media/2013/sep/03/egypt-shut-down-al-jazeera>

¹⁹¹ Al Jazeera Blocked by Saudi Arabia, Qatar Blames Fake News (May 24, 2017), <https://money.cnn.com/2017/05/24/media/al-jazeera-blocked-saudi-arabia-uae/>; Saudi Arabia Bans Al Jazeera Channels in Hotels (June 9, 2017), <https://www.aljazeera.com/news/2017/6/9/saudi-arabia-bans-al-jazeera-channels-in-hotels>

¹⁹² Qatar Told to Close Al Jazeera, Reduce Iran Ties in List of Demands (July 27, 2024) <https://www.cnn.com/2017/06/23/middleeast/gulf-nations-qatar-demands/index.html>

¹⁹³ Israeli Government Moves to Impose Ban on Al-Jazeera News Network (August 6, 2017) <https://www.theguardian.com/world/2017/aug/06/israeli-government-impose-ban-al-jazeera-news-network>; Jordan Revokes Al-Jazeera License Amid Qatar Tensions (June 6, 2017) <https://cpj.org/2017/06/jordan-revokes-al-jazeera-license-amid-qatar-tensi/>

¹⁹⁴ Egypt Blocks Access to News Websites Including Al-Jazeera and Mada Masr (May 25, 2017) <https://www.theguardian.com/world/2017/may/25/egypt-blocks-access-news-websites-al-jazeera-mada-masr-press-freedom>

¹⁹⁵ *Ibid.*

them platforms (including special programming, interviews, social media feeds, etc.) through which to push the Muslim Brotherhood's political platform."¹⁹⁶

145. Following the October 7 Terrorist Attacks, U.S. Secretary of State Antony Blinken asked Qatar to moderate Al Jazeera's coverage of Israel's war against Hamas amid concerns within the Biden administration that Al Jazeera is inflaming public opinion and heightening the risks of a wider conflict.¹⁹⁷ "Al Jazeera's reporting has previously drawn accusations of inciting terrorism from the governments of Saudi Arabia, Egypt, the United Arab Emirates, and Bahrain."¹⁹⁸

146. On May 5, 2024, Israeli Prime Minister Benjamin Netanyahu's Cabinet unanimously voted to close the "incitement channel" Al Jazeera in Israel. Netanyahu said in a statement that "it's time to remove the Hamas mouthpiece from our country."¹⁹⁹ On June 13, 2024, the Tel Aviv District Court renewed the ban on Al Jazeera stating that "Al Jazeera is perceived by the terrorist organization Hamas as its propaganda and intelligence arm."²⁰⁰

147. Northwestern has a branch in Qatar and previously signed a Memorandum of Understanding with Al Jazeera in 2013, which strengthened their ties. In May 2024, The Coalition Against Anti-Semitism at Northwestern, a group of community members, alumni, and allies

¹⁹⁶ Intel Report: Qatar's Funding, Policies Led Directly to Oct. 7; It Shouldn't Be Key Mediator (April 8, 2024), <https://www.timesofisrael.com/intel-report-qatars-funding-policies-led-directly-to-oct-7-it-shouldnt-be-key-mediator/>

¹⁹⁷ US Asks Qatar to 'Turn Down the Volume' Of Al Jazeera News Coverage (October 27, 2023), <https://www.theguardian.com/media/2023/oct/27/us-asks-qatar-to-turn-down-the-volume-of-al-jazeera-news-coverage>

¹⁹⁸ *Ibid.*

¹⁹⁹ Israel Orders Al Jazeera To Close Its Local Operation And Seizes Some Of Its Equipment (May 5, 2024), <https://apnews.com/article/israel-aljazeera-hamas-gaza-war-eba9416aea82f505ab908ee60d1de5e4>

²⁰⁰ 'May Allah Reckon With You': Al Jazeera Caught Censoring Gazan Criticisms for Hamas (June 16, 2024), <https://www.jpost.com/middle-east/article-806444>

dedicated to fighting anti-Semitism, released a report urging Northwestern to sever ties with Al Jazeera, “for the moral reason that it is aiding and abetting the mouthpiece of Hamas, thereby endangering Israelis as victims of Hamas atrocities and Gazan civilians who are cynically used as human shields.”²⁰¹ In July 2024, Northwestern University cut ties with Al Jazeera.²⁰²

The October 7 Terrorist Attacks

148. In the early morning hours of Saturday, October 7, 2023, approximately six thousand terrorists from Hamas and the PIJ in the Gaza Strip perpetrated a cross-border infiltration into Israel, through its southern security fence, and massacred more than 1,200 people, including Israeli citizens, United States citizens, and citizens from other countries, many of whom were brutally burned alive or subject to horrific tortures, rapes, mutilations, and other atrocities. The terrorists invaded by air, sea, land, and through underground tunnels. As the sun rose, massive barrages of rockets and armed drones were launched from Gaza targeting civilian areas throughout the southern parts of Israel, injuring people, and destroying property.

149. After piercing the Gaza border security fence in numerous locations, Hamas and the PIJ terrorists, riding in trucks and on motorbikes, sped into southern Israel, while other terrorists on motorized paragliders began to land at an all-night dance and music festival (the “Supernova Rave”) being held near Kibbutz Re’im, a short distance from the Gaza border.

150. Over 350 attendees were massacred by Hamas at this outdoor festival. Terrorists arriving at the Supernova Rave immediately opened fire on the crowd. One by one, the terrorists chased, dragged, shot, and systematically murdered those they hunted down—mostly young

²⁰¹ Northwestern University Quietly Ends Relationship with Al Jazeera: EXCLUSIVE (October 8, 2024), <https://www.campusreform.org/article/northwestern-university-quietly-ends-relationship-al-jazeera-exclusive/26509>

²⁰² *Id.*

festival attendees—in cold blood. Hamas-led terrorists raped and killed many women, including a young woman who was gang-raped and then shot in the head by a terrorist while he was still violently raping her. Many of the young attendees were loaded onto vehicles, motorcycles, cars, and trucks and then whisked away as captives to Gaza.

151. Videos of the kidnapped, especially young women, being paraded through the streets of Gazan cities, jeered at, and physically assaulted by frenzied mobs were televised and uploaded to social media, with many of these broadcasts coming from Al Jazeera, inciting further violence. In fact, on October 7, 2023, some of Hamas’s leaders, including the then Hamas chief Ismail Haniyeh, gathered to watch Al Jazeera coverage of the October 7 Terrorist Attacks and prostrated in gratitude.²⁰³

152. In addition to perpetrating their murderous assaults, rapes, and arsons, Hamas’s chief goal was to kidnap Israeli, U.S. and other foreign civilians, and soldiers in order to utilize them as hostages and bargaining chips to compel Israel to release convicted Palestinian prisoners held in Israeli prisons.

153. While the October 7 Terrorist Attacks were planned and led by Hamas, other Palestinian terrorist groups also participated in the attacks, including the PIJ.

154. In the course of the day-long attack, more than 1,200 civilians were brutally murdered in communities and kibbutzim in southern Israel. As Hamas terrorists proceeded from home to home and village to village, they bound, beheaded, and tortured the civilians they encountered. Many bodies were lit on fire and burned beyond recognition. On the roads, Hamas-

²⁰³ “In Video, Ismail Haniyeh And Other Hamas Leaders Watch Al-Jazeera Coverage Of Hamas’s Invasion Of Southern Israel, Perform A ‘Prostration Of Gratitude’” (October 07, 2023), <https://www.memri.org/tv/video-ismail-haniyeh-hamas-leader-qatar-jazeera-coverage-israel-invasion> (last visited on October 30, 2024)

led terrorists, sometimes dressed in Israeli military and police uniforms, set up makeshift roadblocks, stopping cars, and then murdering their passengers. Hundreds of these cars were then lit on fire and left burning on the roads. No one and no location were spared: Hamas attacked schools, shelters, businesses, ambulances, and medical facilities. Hamas-led terrorists also looted stores, homes, and personal belongings.

155. According to Israeli intelligence reports, Hamas and the PIJ had planned and trained for this terrorist attack for years, organizing every detail and eventuality including how they would cross into Israel, take over communities, set up roadblocks, document and publicize the heinous tortures, rapes, and murders of their victims, how they would escape to safety, and where they would hold those they abducted to Gaza as hostages.

156. The October 7 Terrorist Attacks amounted to the largest massacre of Jews since the Holocaust and one of the worst terrorist attacks ever perpetrated in world history, by its sheer number of fatalities. The barbaric cruelty of the October 7 Terrorist Attacks and the terrorist organizations' gleeful boasting of their role in the murders, injuries, and rapes repulsed the civilized world. As United States President Joseph Biden stated in a speech only hours after the details of the massacre became known: "Hundreds—hundreds of young people at a music festival of—the festival was for peace—for peace—gunned down as they ran for their lives. Scores of innocents—from infants to elderly grandparents, Israelis and Americans—taken hostage. Children slaughtered. Babies slaughtered. Entire families massacred. Rape, beheadings, bodies burned alive. Hamas committed atrocities that recall the worst ravages of ISIS, unleashing pure unadulterated evil upon the world. There is no rationalizing it, no excusing it. Period."²⁰⁴

²⁰⁴ https://www.youtube.com/watch?v=BEX_vUkKLMo (last visited on February 7, 2025)

157. It took the Israeli government, military, law enforcement, medical responders, municipal workers, and security services more than a week to reestablish a measure of stability to the communities devastated during the October 7 Terrorist Attacks.

158. Even after being abducted to Gaza, many of the hostages were subsequently murdered by their captors or died as a result of injuries they had sustained on October 7, or from being subjected to poor health conditions in the Hamas prison tunnels.

159. The October 7 Terrorist Attacks were widely publicized and televised, along with the subsequent war in Gaza. For such a large-scale attack and the war in Gaza to be successful, significant support, sympathy, and glorification of Hamas's and the PIJ's terrorist agenda were necessary. To perpetrate the attack and to succeed in the ensuing war in Gaza, Hamas and the PIJ relied on support that was knowingly facilitated by Defendants.

160. Defendants acted as a critical vehicle for Hamas and the PIJ to incite violence and further their terrorist objectives, playing an integral role in the success of the complex and devastating October 7 Terrorist Attacks carried out by these groups.

A. *Shnaider Plaintiff: Murdered Family, Kidnapped Mother, Father, and Two Children—October 7, 2023*

161. At 6:30 AM on October 7, 2023, more than 150 terrorists infiltrated Kibbutz Nir Oz and committed horrific atrocities. Nearly 50 of the Kibbutz's 400 residents were horrifically murdered, about 70 hostages were taken and many homes were burned.

162. Plaintiff Maurice Shnaider's sister, Margit Silverman, and her husband were murdered. The couple was initially assumed missing, as they were last seen being abducted from their home. But their bodies were later identified on October 21, 14 days later.

163. Margit's son-in-law, Maurice Shnaider's nephew-in-law, Yarden Bibas, was beaten and forcibly kidnapped from his home by Hamas into Gaza. A Hamas video was circulated of

Yarden Bibas with blood around his head, surrounded by terrorists. He remains in captivity, and it is unknown if he is alive or dead.

164. Separately, Margit's daughter, Maurice Shnaider's niece, Shiri Bibas, was taken hostage by Hamas into Gaza with her baby Kfir (9 months old at the time) and child Ariel Bibas (4 years old at the time). A video filmed by Hamas terrorists was widely circulated with Shiri holding both boys in her arms. She looked terrified and was clearly trying to protect her babies with her body. On November 29, 2023, as part of ongoing psychological warfare, Hamas claimed Shiri Bibas and her two babies were killed, but never provided any proof of death. The State of Israel and their family continue to assume they are alive until proven otherwise.

165. Plaintiff, Maurice Shnaider, is devastated and traumatized by the death of his sister and his brother-in-law, the lengthy waiting period he endured until he received confirmation of their deaths, and the horrific abduction and continued captivity of his niece, nephew, and great-nephews. Plaintiff suffered economic, emotional, and psychological injuries as a result of the attack.

B. Lubin Plaintiff: Terrorist Stabbing—November 6, 2023

166. On the morning of October 7, Rose Ida Lubin, decedent, was off duty on Kibbutz Sa'ad at the home of her adopted family for the holiday of Simhat Torah. When terrorists broke into the kibbutz, Rose grabbed her weapon and fought the terrorists. She fought fiercely throughout the day until she was called back to Jerusalem and ordered to assume her duties with the Israeli Border Police.

167. Having survived the horrific Hamas terror attack of October 7, 2023, Rose was tragically murdered by a 16-year-old terrorist on November 6, 2023.

168. On the morning of November 6, 2023, decedent Sergeant Rose Ida Lubin, who was serving in the Israel Border Police, was patrolling near Herod's Gate, outside Jerusalem's Old City. While patrolling, Rose Ida Lubin and another officer were attacked and stabbed by the young terrorist.

169. Decedent Rose Ida Lubin was treated on site by Magen David Adom paramedics and then rushed to Hadassah-University Medical Center in Jerusalem for treatment, where she succumbed to her injuries and died.

170. Decedent Rose Ida Lubin was killed in an extrajudicial killing by a terrorist from, or supported by, a specifically designated global terrorist organization.

171. The heirs and the beneficiaries of the estate of Rose Ida Lubin have suffered severe economic, psychological, and emotional injuries as a result of the attack.

C. *Haber Plaintiff: Killed in Action—January 16, 2024*

172. Decedent Zachary Philip Haber was serving in the IDF when he was killed in an extrajudicial killing at the hands of terrorists from a specifically designated global terrorist organization.

173. The heirs and beneficiaries of the estate of decedent Zachary Philip Haber suffered severe economic, emotional and psychological injuries as a result of the attack in which decedent Zachary Philip Haber was killed.

D. *Kelmanson Plaintiff: Injured—October 7, 2023*

174. With the outbreak of the surprise attack on Israel on October 7, 2023, Menachem Kelmanson joined his brother Elhanan and set out to help the residents of the Israeli communities next to the Gaza strip, that were under attack by hundreds of terrorists. Later Itiel Zohar, their

sister's son, joined them. The three rescued about a hundred Kibbutz members from Kibbutz Beerli. During the rescue, Elhanan was shot and killed by the terrorists. Menachem was injured.

175. Plaintiffs Ayelet Nehama Newman-Kelmanson suffered severe economic, emotional, and psychological injuries as a result of the attack in which her husband was injured and brother-in-law was killed.

E. Bollag Plaintiff: Car Ramming Terror Attack in Ra'anana—January 15, 2024

176. At around 1:30 pm on Jan 15, 2024, two terrorists stole several vehicles and began ramming and stabbing pedestrians in multiple locations around the city of Ra'anana.

177. That afternoon, Plaintiff S.B. was waiting for his bus home at the bus stop after school. Suddenly, one of the terrorists intentionally drove his car onto the sidewalk aiming for the group of people waiting for the bus.

178. S.B. was hit by the car and was taken to the hospital where he received treatment for a severe foot injury. Months later S.B. is still receiving physical therapy for his injuries and has suffered emotionally.

179. Plaintiff S.B. suffered severe physical, psychological and emotional injuries as a result of the attack.

F. Mizrachi Plaintiff: Nova Music Festival Massacre—October 7, 2023

180. Decedent Ben Menashe Mizrachi, a former medic in the Israel Defense Forces, was participating in the weekend long Supernova Rave music festival (the "Nova Music Festival") at Kibbutz Re'im on Friday night, October 6, 2023.

181. At 6:30 am, the following morning, rockets were observed flying above the festival and soon after Hamas and PIJ terrorists began infiltrating and attacking the revelers on the festival grounds.

182. Decedent Ben Menashe Mizrahi was with his close friend decedent Itai Bausi and were blocked by terrorists. Despite having no weapons or ammunition, and instead of seeking shelter, Ben Menashe Mizrahi chose to stay and utilize his medical knowledge to help care for the wounded and was eventually shot in the head by the terrorists.

183. Plaintiff Dikla Mizrahi, as personal representative of the Estate of Ben Menashe Mizrahi, suffered severe economic, emotional, and psychological injuries as a result of the attack, in which Ben Menashe Mizrahi was killed.

G. Nahmias Plaintiff: Terrorist Invasion in Sderot and Netiv Ha'asara—October 7, 2023

184. Decedent Chen Nahmias was called to assist his counterterrorism unit in the IDF on the morning of October 7, 2023 in Sderot, Israel and was subsequently killed in an extrajudicial killing by Hamas and PIJ terrorists.

185. When the decedent Chen Nahmias arrived in Sderot, he was met by an intense onslaught of Hamas and PIJ terrorists, who had begun infiltrating from Gaza into the city.

186. Despite being shot twice by the infiltrating terrorists, decedent Chen Nahmias continued to shoot back at the terrorists until he had lost all his ammunition. After firing all of his ammunition, Chen Nahmias collapsed and died from his bullet wounds.

187. Plaintiff Orit Nahmias suffered severe economic, emotional, and psychological injuries as a result of the attack in which her brother was killed, as well as from the terror invasion into the Plaintiff's own town of Netiv Ha'asara, which also occurred on the morning of October 7, 2023.

H. Sharabi Plaintiff: Terrorist Invasion in Sderot—October 7, 2023

188. Plaintiff Yinon Sharabi is a resident of Sderot, Israel.

189. On October 7, 2023, Yinon Sharabi, alongside his wife and children, found himself in the midst of a terrorist invasion of his town. The Hamas attackers had entered the city, overwhelmed the police and security officials, and were shooting residents in the street, their homes, and the shelters where they had fled. The heavily armed terrorists spared no one in their efforts to murder, rape and kidnap anyone who fell into their path.

190. In his terrifying and extreme efforts to save his family, Plaintiff Yinon Sharabi suffered severe economic, psychological and emotional injuries as a result of the attack.

I. Wachs Plaintiffs: Terrorist Invasion in Netiv Ha'asara—October 7, 2023

191. Decedent Igal Wachs was a member of the community's volunteer security team in the village of Netiv Ha'asara, Israel.

192. On the morning of October 7, 2023, Igal Wachs and other members of the security team were horrifyingly notified that terrorists were invading their village.

193. Decedent Igal Wachs quickly went to help defend the village against the terrorists who were armed with automatic weapons, grenades, RPGs, and knives. Tragically, Igal was brutally killed in an extrajudicial killing by terrorists from a specifically designated global terrorist organization, intent on murdering or abducting anyone they could reach.

194. Plaintiffs, Igal Wachs's family members, were devastated to learn that their husband and father had been killed. They suffered severe economic, psychological, and emotional injuries as a result of the attack.

J. Merkin Plaintiff: Car Ramming Terror Attack in Ra'anana—January 15, 2024

195. At around 1:30 pm on Jan 15, 2024, two terrorists stole several vehicles and began ramming and stabbing pedestrians in multiple locations around the city of Ra'anana.

196. At around 1:40 pm, Plaintiff I.T.M. was waiting at the bus stop for his bus home from school, at the intersection of Ahuza Street and Jerusalem Street in Ra'anana, when one of the terrorists rammed his car into the group waiting at the stop. Plaintiff I.T.M. was struck by the terrorist's car and flung into the air.

197. Plaintiff I.T.M. lost consciousness, suffered severe injuries, and has not been able to return to usual physical activities.

198. Plaintiff I.T.M. suffered severe physical, psychological, and emotional injuries as a result of the attack.

K. Kamer Plaintiff: Car Ramming Terror Attack in Ra'anana—January 15, 2024

199. At around 1:30 pm on Jan 15, 2024, two terrorists stole several vehicles and began ramming and stabbing pedestrians in multiple locations around the city of Ra'anana.

200. That afternoon, Plaintiff N.E.K. was waiting for his bus home at the bus stop after school. Suddenly, one of the terrorists intentionally drove his car onto the sidewalk aiming for the group of people waiting for the bus. Plaintiff N.E.K. was hit by the car.

201. Plaintiff N.E.K. sustained critical injuries to his head and spinal cord and doctors fought to save his life. N.E.K. has not been able to return to usual physical activities.

202. Plaintiff N.E.K. suffered severe physical, psychological, and emotional injuries as a result of the attack.

L. Hexter Plaintiff: Killed in Action—January 8, 2024

203. Decedent Yakir Hexter was serving in the IDF when he was killed in an extrajudicial killing at the hands of terrorists from a specifically designated global terrorist organization.

204. The heirs and beneficiaries of the Estate of Decedent, Yakir Hexter, suffered severe economic, emotional and psychological injuries as a result of the attack in which Yakir Hexter was killed.

M. Gitler Plaintiff: Killed in Action—January 8, 2024

205. Decedent David Schwartz was serving in the IDF when he was killed in an extrajudicial killing at the hands of terrorists from a specifically designated global terrorist organization.

206. Plaintiff Meital Gabriela Gitler suffered severe economic, emotional, and psychological injuries as a result of the attack in which her husband was killed.

N. Bernstein Plaintiff: Killed in Action—October 7, 2023

207. Decedent, Yehonatan Tzor, was a Lieutenant Colonel in the Nahal Reconnaissance Battalion. The weekend of October 7, 2023, he was off duty, home with his wife and three children celebrating the Jewish holiday of Simhat Torah.

208. In the early morning hours of October 7, he received a phone call from one of his officers informing him of major terrorist attacks in southern Israel.

209. Yehonatan quickly got in his car to drive south and join his battalion. As he drove further south, he encountered a squad of infiltrating terrorists. He attempted to fend the terrorists off, hitting some with his car. They, however, overwhelmed him and the decedent was shot.

210. Realizing that he was surrounded, outnumbered, and gravely wounded, Yehonatan forcefully crashed his car into a terrorist vehicle that was equipped with a mounted heavy machine gun and was killed in an extrajudicial killing by terrorists from a specifically designated global terrorist organization.

211. Plaintiff Haim Bernstein was devastated to learn that his son had been killed. He suffered severe economic, psychological and emotional injuries as a result of the attack.

O. Halley Plaintiff: Nova Music Festival Massacre—October 7, 2023

212. Plaintiff Ethan Halley a/k/a Eitan Halley was attending the Nova Music Festival on the morning of October 7, 2023.

213. At 6:30 AM on the morning of October 7, 2023, Ethan Halley and other festival goers observed rockets overhead and went to a nearby bomb shelter.

214. As Hamas terrorists began infiltrating the festival grounds, the shelter the Plaintiff was in was bombarded by terrorist grenades, guns, and RPG rockets.

215. Ethan Halley watched as his friends were killed around him or taken hostage. When terrorists came in to inspect the bodies left in the shelter, Ethan Halley pretended to be dead for hours under and near the bodies of his friends.

216. Ethan Halley suffered severe physical injuries, with shrapnel lodged in various parts of his body, including his lungs.

217. Ethan Halley was eventually rescued by the Israel Defense Forces and taken to Soroka Medical Center to receive treatment.

218. Plaintiff Ethan Halley suffered severe physical, psychological, and emotional injuries as a result of the attacks.

P. Saadon Plaintiff: Killed Defending Others—October 7, 2023

219. On the morning of October 7, 2023, decedent Hallel Shmuel Saadon, a staff sergeant in the Israel Defense Forces, was stationed in southern Israel, near Kibbutz Safa.

220. In the early morning, terrorists began invading near where he was stationed and Hallel Shmuel Saadon, along with the other soldiers, attempted to defend against the onslaught of attacks from the Hamas terrorists.

221. Decedent Hallel Shmuel Saadon was then killed in an extrajudicial killing during a terrorist attack by a specifically designated global terrorist organization while attempting to protect other civilians and soldiers.

222. The heirs and beneficiaries of the estate of Hallel Shmuel Saadon suffered severe economic, psychological and emotional injuries as a result of the attack.

Q. Margulies Plaintiff: Injured in Action

223. Plaintiff Isaac Margulies was serving in the Israel Defense Forces when he was attacked in an extrajudicial attack in Gaza by terrorists from a specifically designated global terrorist organization, and badly injured.

224. Isaac Margulies received treatment for his injuries, including burns, broken bones, and shrapnel injuries, at Rabin Medical Center.

225. Plaintiff Isaac Margulies suffered severe physical, psychological, and emotional injuries as a result of the attack.

R. Rom Plaintiffs—Nova Music Festival Massacre—October 7, 2023

226. Decedent Jonathan Rom a/k/a Yonatan Rom was attending the Nova Music Festival on the morning of October 7, 2023.

227. When Hamas terrorists began infiltrating the festival grounds during their attack, decedent Jonathan Rom broke away from the other festival goers who were attempting to flee in order to assist a friend who was experiencing a panic attack.

228. While Jonathan attempted to calm his friend down and escape, both he and his friend were shot by terrorists who opened fire on them.

229. The heirs and beneficiaries of the estate of Jonathan Rom suffered severe economic, psychological and emotional injuries as a result of the attack.

S. Zenilman Plaintiff: Killed in Action—December 10, 2023

230. Decedent Ari Zenilman was called for reserve duty in the Israel Defense Forces on October 7, 2023. He quickly said goodbye to his wife and three young children and headed south to join his unit. Two months later, Ari Zenilman was still serving in reserve duty on December 10, 2023, when he was attacked in Gaza by terrorists from a specifically designated global terrorist organization and was killed in an extrajudicial killing.

231. Plaintiff Yonah Chava Landau Zenilman, individually, on behalf of the estate of Ari Yehiel Weinsoff Zenilman, suffered severe economic, psychological and emotional injuries from the attack in which, her husband was killed.

T. Tatelbaum Plaintiff: Killed in Action—June 28, 2024

232. Decedent Yakir Tatelbaum was serving in the IDF when he was killed in an extrajudicial killing at the hands of a terrorist sniper from a specifically designated global terrorist organization.

233. The heirs and beneficiaries of the estate of Yakir Tatelbaum suffered severe economic, emotional, and psychological injuries as a result of the attack in which Yakir Tatelbaum was killed.

U. Bausi Plaintiff—Nova Music Festival Massacre—October 7, 2023

234. Decedent Itai Bausi served as a paramedic in the Israel Defense Forces Duvdevan Unit and had participated in the Nova Music Festival on Friday night, October 6, 2023.

235. At 6:30 am the following morning, rockets were seen flying above the festival and subsequently Hamas and PIJ terrorists began infiltrating and attacking the festival grounds.

236. Decedent Itai Bausi and his friend Ben Mizrahi, who travelled with him to the festival, attempted to flee in their car but were blocked by terrorists.

237. Despite having no weapons or ammunition, instead of seeking shelter, Itai Bausi chose to stay, utilize his medical knowledge, help care for the wounded, and, eventually, assist the police forces in fighting back against the terrorists.

238. By 10:30 AM on October 7, Itai Bausi had been shot by terrorists in the leg and back. He called friends on his cellphone, hoping someone could help, and left a voicemail for his long-term girlfriend, Carmel Ripstein. He also tried to reach his friend Ben Mizrahi, unaware that Mizrahi had already been fatally shot in the head by the terrorists. After making these calls, Itai Bausi put his phone in his pocket and, tragically, bled to death.

239. Itai's family members, anxiously waited for days, not knowing if Itai was alive or dead or whether he had been taken hostage like other festival goers. Four days after the attack, Itai was confirmed dead on October 11, 2023. Itai's family members were devastated and traumatized both by the tragic news of his death and by the lengthy waiting period they endured until they received confirmation of his death. The heirs and beneficiaries of the estate of Itai Bausi suffered severe economic, emotional, and psychological injuries as a result of the attack.

FIRST CAUSE OF ACTION
Provision of Material Support to Terrorists
in Violation of 18 U.S.C. §§ 2339A and 18 U.S.C. § 2333

240. Plaintiffs repeat and reallege each and every allegation of the foregoing paragraphs as if more fully set forth herein.

241. Title 18 U.S.C. § 2339A prohibits the provision of material support or resources while knowing or intending that the support will be used to commit or prepare a federal crime of terrorism.

242. Material support or resources is broadly defined to include any property, tangible or intangible, or service, including financial support, training, expert advice or assistance, communications equipment, and personnel. The statute does not require that the provider of material support have the specific intent to aid or encourage the particular attacks that injured plaintiffs; it is sufficient that the defendant provided financial services or resources knowing or intending that such provision would generally facilitate terrorist activities.

243. Al Jazeera employees, who are or were Hamas and PIJ operatives, shared live updates of the October 7 Terrorist Attacks on their personal social media accounts as they occurred and glorified these acts of terrorism. This conduct demonstrates prior knowledge of the terrorist activities, coordination with and direction from Hamas, and an intent to further these acts by providing a platform and positive portrayal, thus further inciting violence. Al Jazeera employees gave live updates and broadcasts in real-time, praising and glorifying the terrorist attacks, and their posts of violent images confirm their coordination with and participation in the terrorist attacks.

244. By providing live coverage, violent images, and inciting language of the October 7 Terrorist Attacks and the aftermath, Defendants materially supported terrorism by offering expert assistance, communications equipment, and personnel to Hamas and the PIJ, with the knowledge and intent that these resources would be used to facilitate acts of terrorism, which constitutes material support under 18 U.S.C. § 2339A.

245. The financial payments by Defendants to leaders of Hamas and the PIJ for interviews and the financial payments by Defendants to its own employees, who were Hamas and

PIJ operatives, constitute further material support under 18 U.S.C. §2339A. Funding provided to a terrorist organization with the knowledge that the funds will be used to help carry out acts of terrorism establishes liability under 18 U.S.C. §2339A.

246. Additionally, Al Jazeera correspondents, who are also Hamas and PIJ operatives, trained Hamas and PIJ members on how to use weapons and drones and have participated in training activities. Training provided to a terrorist organization with the knowledge that the training is in preparation for terrorism offenses establishes liability under 18 U.S.C. §2339A.

247. Moreover, several Al Jazeera correspondents have also served as Hamas and PIJ operatives with Defendants' knowledge that their employees were working with Hamas and the PIJ. Personnel provided to a terrorist organization with the knowledge that they are helping to carry out acts of terrorism establishes liability under 18 U.S.C. §2339A.

248. At all times relevant to this action, Defendants knew that Hamas and PIJ were Foreign Terrorist Organizations.

249. Providing material support to Hamas and the PIJ in violation of 18 U.S.C. §2339A constitutes acts of international terrorism pursuant to 18 U.S.C. § 2331(1), and Plaintiffs are entitled to recover economic and non-economic damages, including solatium damages, under 18 U.S.C. § 2333(a).

250. Defendants' conduct was evil, malicious, outrageous, reckless, deliberate, and willful, thus warranting an award of punitive damages under D.C. Code § 22-1840.

251. By committing violations of 18 U.S.C. § 2339A that have caused the Plaintiffs to be injured in his or her person, business, or property, Defendants are liable pursuant to 18 U.S.C. § 2333 for threefold any and all damages that Plaintiffs have sustained as a result of such injuries, and the costs of this suit, including attorneys' fees.

SECOND CAUSE OF ACTION
Provision of Material Support to Terrorists
in Violation of 18 U.S.C. §§ 2339B and 18 U.S.C. § 2333

252. Plaintiffs repeat and reallege each and every allegation of the foregoing paragraphs as if more fully set forth herein.

253. Title 18 U.S.C. § 2339B prohibits the knowing provision of material support or resources to a designated Foreign Terrorist Organization.

254. Hamas and the PIJ have been and continue to be designated Foreign Terrorist Organizations.

255. Each of the Defendants knowingly provided material support to Hamas, a foreign terrorist organization as defined in 18 U.S.C. §2339B, and to the PIJ, a foreign terrorist organization as defined in 18 U.S.C. §2339B.

256. At all relevant times, Defendants knew of Hamas's and the PIJ's terrorist activities. Defendants also knew that Hamas and the PIJ had each been designated a Foreign Terrorist Organization.

257. Al Jazeera employees, who are or were Hamas and PIJ operatives, broadcasted the October 7 Terrorist Attacks as they occurred and glorified these acts of terrorism. This conduct demonstrates prior knowledge of the terrorist activities, coordination with and direction from Hamas, and an intent to further these acts by providing a platform and positive portrayal, thus further inciting violence. Their broadcasts in real-time, praising and glorifying the terrorist attacks, and their posts of violent images, confirm their coordination with and participation in the terrorist attacks. It is wholly foreseeable that the glorification of these attacks encourages, supports, and incites further terrorist activities, thus fulfilling the intent requirement to facilitate such crimes. By providing live coverage, violent images, and inciting language of the October 7 Terrorist Attacks,

Defendants materially supported terrorism by offering expert assistance, communications equipment, and personnel to Hamas and the PIJ, with the knowledge that they are terrorist organizations, which constitutes material support under 18 U.S.C. §2339B.

258. Furthermore, the financial payments by Defendants to leaders of Hamas and the PIJ for interviews and the financial payments by Defendants to its own employees, who were Hamas and PIJ operatives, constitute material support under 18 U.S.C. §2339B. By paying these individuals, Al Jazeera provides financial support to terrorists, which constitutes material support for terrorism. Since Al Jazeera knowingly compensated operatives of Hamas and the PIJ, fully aware of their affiliations with these terrorist organizations, its actions amount to material support for terrorism. Funding provided to a terrorist organization with the knowledge that it is a terrorist organization establishes liability under 18 U.S.C. §2339B.

259. Moreover, Al Jazeera correspondents, who are also Hamas operatives, have trained Hamas members on how to use weapons and drones and have participated in training activities. Training provided to a terrorist organization with the knowledge that it is a terrorist organization establishes liability under 18 U.S.C. §2339B.

260. Several Al Jazeera correspondents have also served as Hamas and PIJ operatives with Defendants' knowledge that their employees were working with Hamas and the PIJ. Personnel provided to a terrorist organization with the knowledge that it is a terrorist organization establishes liability under 18 U.S.C. §2339B.

261. The services and support that Defendants purposefully, knowingly, or with willful blindness provided to Hamas and the PIJ constitute material support to the preparation and carrying out of acts of international terrorism, including the acts that caused the Plaintiffs to be injured in his or her person and property

262. Providing material support to Hamas and the PIJ in violation of 18 U.S.C. §2339B constitutes acts of international terrorism pursuant to 18 U.S.C. § 2331(1), and Plaintiffs are entitled to recover economic and non-economic damages, including solatium damages, under 18 U.S.C. § 2333(a).

263. The conduct of the Defendants was evil, malicious, outrageous, reckless, deliberate, and willful, thus warranting an award of punitive damages under D.C. Code § 22-1840.

264. By committing violations of 18 U.S.C. § 2339B that have caused the Plaintiffs to be injured in his or her person, business or property, Defendants are liable pursuant to 18 U.S.C. § 2333 for threefold any and all damages that Plaintiffs have sustained as a result of such injuries, and the costs of this suit, including attorney's fees.

THIRD CAUSE OF ACTION
Liability For Aiding and Abetting Acts of International Terrorism
Pursuant to 18 U.S.C. § 2333(a) and (d)

265. Plaintiffs repeat and reallege the foregoing allegations with the same force and effect as if more fully set forth herein.

266. The ATA, as amended by JASTA, imposes secondary civil liability on anyone who “aids and abets, by knowingly providing substantial assistance...[to] the person who committed [] an act of international terrorism.” 18 U.S.C. § 2333(d)(2).

267. Hamas and the PIJ have been and continue to be Foreign Terrorist Organizations.

268. Hamas, with the assistance of the PIJ and other terrorist organizations, committed, planned, and authorized activities—including the October 7 Terrorist Attacks—which involved violent acts and acts dangerous to human life that violated the criminal laws of the United States

or would have violated those laws had they been committed within the jurisdiction of the United States or of any State.

269. The acts Hamas and the PIJ committed, planned, and authorized were intended: (a) to intimidate or coerce the civilian populations of Israel and the United States; (b) to influence the policy of Israel and the United States by intimidation and coercion; and (c) to affect the conduct of the Israeli and United States governments by mass destruction, assassination, and kidnapping.

270. The activities committed, planned, or authorized by Hamas, with the assistance of the PIJ and other terrorist organizations, occurred entirely or primarily outside of the territorial jurisdiction of the United States and constituted acts of international terrorism as defined in 18 U.S.C. § 2331(1).

271. Plaintiffs have been injured in their person by reason of the acts of international terrorism committed, planned, or authorized by Hamas and the PIJ.

272. At all times relevant to this action, Defendants knew that each of Hamas and the PIJ is a Foreign Terrorist Organization and that Hamas and the PIJ had engaged in and continued to engage in illegal acts of terrorism, including international terrorism.

273. Defendants aided and abetted Hamas and the PIJ, by knowingly providing substantial assistance, in committing, planning, or authorizing acts of international terrorism, including the acts of international terrorism that injured Plaintiffs

274. Defendants employed and compensated journalists who are members of Hamas, compensated leaders and operatives of FTOs for interviews, and offered a platform for Hamas and the PIJ to organize, communicated terrorist plans, recruited members, and incited violence. Defendants consciously and voluntarily participated in the terrorist organizations' agenda.

275. By compensating Hamas and the PIJ leaders for interviews which promoted their violent agendas and compensating employees who serve with Hamas and the PIJ, Al Jazeera contributed financial and material support to the terrorist groups helping them carry out their terrorist acts. These acts of knowingly providing financial support establish liability under 18 U.S.C. § 2333(d)(2).

276. Furthermore, Al Jazeera employees, identified as Hamas operatives, actively participated in the October 7 Terrorist Attacks by providing a platform to promote the terrorists' actions and incite violence, and demonstrating prior knowledge of the attacks with an intent to further these acts. Aiding and abetting Hamas and the PIJ by knowingly providing substantial assistance establishes liability under 18 U.S.C. § 2333(d)(2).

277. Additionally, Al Jazeera correspondents, who are also Hamas and PIJ operatives, have trained Hamas and PIJ members on how to use weapons and drones and have participated in training activities to assist these terrorist groups in carrying out their terrorist acts. Knowingly providing substantial assistance by training a terrorist organization establishes liability under 18 U.S.C. § 2333(d)(2).

278. Moreover, several Al Jazeera correspondents have also served as Hamas and PIJ operatives with Defendants' knowledge that their employees were working with Hamas and the PIJ to help them carry out their terrorist agenda. Providing substantial assistance by working with a terrorist organization establishes liability under 18 U.S.C. § 2333(d)(2).

279. By aiding and abetting Hamas and the PIJ in committing, planning, or authorizing acts of international terrorism, including acts that caused each of the Plaintiffs to be injured in his or her person and property, Defendants are liable pursuant to 18 U.S.C. § 2333(a) and (d) for

threefold any and all damages that Plaintiffs have sustained as a result of such injuries, and the costs of this suit, including attorneys' fees.

280. The conduct of the Defendants was evil, malicious, outrageous, reckless, deliberate, and willful, thus warranting an award of punitive damages under D.C. Code § 22-1840.

FOURTH CAUSE OF ACTION
Liability for Conspiring in Furtherance of Acts of International Terrorism
Pursuant to 18 U.S.C. § 2333(a) and (d)

281. Plaintiffs repeat and reallege each and every allegation of the foregoing paragraphs as if more fully set forth herein.

282. The ATA, as amended by JASTA, imposes secondary civil liability on anyone “who conspires with the person who committed...an act of international terrorism.” 18 U.S.C. § 2333(d)(2). Secondary liability “reaches persons who do not engage in the proscribed activities at all, but who give a degree of aid to those who do.”²⁰⁵

283. The acts Hamas and the PIJ committed, planned, and authorized were intended: (a) to intimidate or coerce the civilian populations of Israel and the United States; (b) to influence the policy of Israel and the United States by intimidation and coercion; and (c) to affect the conduct of the Israeli and United States governments by mass destruction, assassination, and kidnapping.

284. At all relevant times to this action, Defendants knew that both Hamas and the PIJ are Foreign Terrorist Organizations engaging in illegal acts of terrorism.

285. Defendants knowingly conspired, directly and indirectly, with Hamas and the PIJ to facilitate its operations in committing, planning, or authorizing acts of international terrorism, including acts that caused the Plaintiffs to be injured in his or her person and property.

²⁰⁵ *Cent. Bank of Denver, N.A. v. First Interstate Bank of Denver, N.A.*, 511 U.S. 164, 176 (1994).

286. By working as terrorist operatives, Al Jazeera employees have conspired with and aided and abetted a designated terrorist organization, further facilitating acts of terrorism. Defendants furthered these terrorist organizations' agenda by serving with them, which assisted them to commit acts of terrorism, including the October 7 Terrorist Attacks.

287. By broadcasting incitement to violence and terrorism, compensating terrorist leaders for interviews, compensating its employees who were also Hamas and PIJ operatives, providing training to Hamas and the PIJ, and serving in Hamas and in the PIJ, Defendants directly participated in furthering these terrorist groups' terrorist objectives. Hamas and the PIJ acted overtly in support of the conspiracy through, at least, the commissions of the October 7 Terrorist Attacks. The Defendants' actions demonstrate an intent to further the terrorist activities of Hamas and the PIJ.

288. At all times, Defendants were and continue to be engaged in a common pursuit with Hamas and the PIJ and share their objectives. Each of the Defendants furthered the conspiracy and shared the same object as Hamas and the PIJ through their knowing direct and/or indirect participation in Hamas's and the PIJ's broad, coordinated, global campaign to destroy the state of Israel by committing acts of violence and terrorism, including the October 7 Terrorist Attacks.

289. Each Defendant knew that the objective of the conspiracy was to facilitate terrorist attacks against Israelis and Israeli Americans, including the October 7 Terrorist Attacks.

290. The October 7 Terrorist Attacks was a foreseeable act in furtherance of this conspiracy that caused Plaintiffs' injuries.

291. By conspiring with Hamas and the PIJ in committing, planning, or authorizing acts of international terrorism, including acts that caused each of the Plaintiffs to be injured in his or her person and property, Defendants are liable pursuant to 18 U.S.C. § 2333(a) and (d) for threefold

any and all damages that Plaintiffs have sustained as a result of such injuries, and the costs of this suit, including attorneys' fees.

292. The conduct of the Defendants was evil, malicious, outrageous, reckless, deliberate, and willful, thus warranting an award of punitive damages under D.C. Code § 22-1840.

DAMAGES

293. The decedents suffered pain and suffering. Their estates suffered severe injury, including conscious pain and suffering, pecuniary loss, loss of income, loss of guidance, companionship, and society, loss of consortium, severe emotional distress, mental anguish, and loss of solatium.

294. The injured Plaintiffs suffered severe physical, psychological, emotional, and other injuries as a result of the October 7 Terrorist Attacks including disfigurement, loss of physical and mental functions, extreme pain and suffering, loss of guidance, companionship, and society, loss of consortium, severe emotional distress, mental anguish, and loss of solatium, and loss of future income.

295. The other Plaintiffs herein, the family members of the decedents and the injured, all suffered severe psychological, emotional, and other personal injuries as a result of the October 7 Terrorist Attacks in which their loved ones were killed or severely physically injured, including extreme pain and suffering, loss of guidance, companionship and society, loss of consortium, severe emotional distress, mental anguish, and loss of solatium.

296. Plaintiffs' harms, as described above, include imminent fear of injury or death, extreme emotional distress, property damage, loss of consortium, and enduring pain and suffering, which were the result of the October 7 Terrorist Attacks and other activities carried out by Hamas and the PIJ with substantial assistance and material support from Al Jazeera.

JURY DEMAND

297. Plaintiffs demand trial by jury of all issues legally triable to a jury.

PRAYER FOR RELIEF

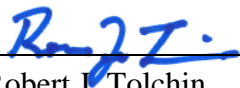
WHEREFORE, Plaintiffs demand judgment as follows:

- a) Judgment against all Defendants, jointly and severally, for compensatory damages in an amount to be shown, over one billion dollars;
- b) Judgment against all Defendants, jointly and severally, for punitive damages in an amount to be determined at trial;
- c) An award of pre-judgment interest and post-judgment interest;
- d) Plaintiffs' costs and expenses;
- e) Plaintiffs' attorneys' fees; and
- f) Such other and further relief as is just and proper under the circumstances.

Dated: February 23, 2025
Brooklyn, New York

Respectfully submitted,

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