



TAXPAYERS AGAINST GENOCIDE

Stakeholder Report for the United Nations Universal Periodic Review of the United States:
International criminal & humanitarian law (including crimes against humanity, war crimes, genocide)

Submitted by Taxpayers Against Genocide,
a non-governmental, grassroots mass movement comprising over 2,000 U.S. taxpayers

and contributing organizations:
National Lawyers Guild International Committee
International Association of Democratic Lawyers

Endorsed by:
The Women's International League for Peace and Freedom – U.S. Section
CODEPINK
Interfaith Communities United for Justice and Peace
Roots Action

for the 40th Session of the Working Group on the Universal Periodic Review, Fourth Cycle

Submitted April 7, 2025

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Taxpayers Against Genocide (TAG) is a grassroots mass movement of thousands of U.S. taxpayers.

Countless federal taxpayers repeatedly called, emailed, petitioned and peacefully protested their congressional representatives and U.S. government officials beginning in October 2023, pleading with them to stop using their tax dollars to fund what had clearly become a [genocide](#) in Gaza. After almost one year of having their Congress members refuse to meet or consider their constituents’ pleas, a group of Northern California taxpayers formed TAG in fall 2024 and filed a federal [class action lawsuit](#), arguing that it is illegal to use tax dollars for genocide. The case was dismissed on February 10, 2025. TAG continues to work for the world we know is possible – one where workers and families are safe to flourish on a healthy planet free from occupation, extraction, oppression, apartheid, and exploitation; where leaders are accountable to the people they serve and not to powerful special interests.

Organizations contributing to this report:

The **National Lawyers Guild (NLG) International Committee** is part of the oldest multiracial bar association in the U.S. Its membership includes lawyers, law students, legal workers and jailhouse lawyers in most states of the U.S. The NLG works “*in service to the people to the end that human rights and the rights of ecosystems are more important than property interests*” (Preamble, NLG constitution, amended 2018) and advocates for implementation of international human rights in domestic and international fora.

The **International Association of Democratic Lawyers (IADL)** is an international legal organization with sections and members in more than 50 countries. IADL has consultative status with the UN and ECOSOC and UNESCO. It was established to promote international law and understanding among lawyers and their associations, and it works to achieve the aims of the UN Charter. The IADL constitution calls for defending and promoting human and peoples' rights as well as integrating international human rights covenants into the national laws of each country.

Organizations endorsing this report:

The **Women's International League for Peace and Freedom (WILPF)** was founded in 1915 during World War I, with Jane Addams as its first president. WILPF is a membership-based feminist peacebuilding organization with presence and impact around the world. WILPF U.S. works to achieve through peaceful means world disarmament, full rights for women, racial and economic justice, an end to all forms of violence, and to establish political, social and psychological conditions which can assure peace, freedom, and justice for all. WILPF has consultative status with the UN Economic and Social Council (ECOSOC).

CODEPINK is a feminist grassroots organization, founded in 2002, working to end U.S. warfare and imperialism, support peace and human rights initiatives, and redirect resources into healthcare, education, green jobs and other life-affirming programs.

Interfaith Communities United for Justice and Peace was founded by a group of Los Angeles religious leaders over 23 years ago, in the wake of 9/11, insisting that religious communities must stop blessing war and violence. ICUJP peace workers are committed to four core principles: the power of love to overcome hatred; the power of mercy to conquer vengeance; the celebration of our common humanity and the sacredness of human life; and our calling to build a just, equitable and peaceful world.

Roots Action, founded in 2011, is dedicated to galvanizing people who are committed to economic fairness, equal rights for all, civil liberties, environmental protection – and defunding endless wars. Roots Action mobilizes on these issues no matter whether Democrats or Republicans control Washington, D.C.

A. INTRODUCTION

1. This report involves U.S. obligations under the United Nations (UN) Charter; Articles 19, 20 and 21 of the Universal Declaration of Human Rights (UDHR); Articles 9, 19, 21 and

25 of the International Convention on Civil and Political Rights (ICCPR); Article 2 and 5 of the International Convention on the Elimination of All Forms of Racism and Discrimination (ICERD); Article 33 of the Fourth Geneva Convention; and Articles II and III(e) of the Convention on the Prevention and Punishment of the Crime of Genocide. All of these instruments have been ratified by the United States and are therefore considered the “supreme Law of the Land” under Article VI, Section 2 of the U.S. Constitution. Further, the prohibition of genocide is recognized as a peremptory norm or “jus cogens” in international law, meaning it is a fundamental principle from which no derogation is permitted.”¹

2. The focus of this report is on violations of U.S. obligations by the U.S. Congress and executive in committing residents’ tax dollars – including those of Palestinian-Americans whose families have been decimated in Gaza – to support what the International Court of Justice (ICJ) and International Criminal Court (ICC) as well as Amnesty International, Human Rights Watch, Medecins Sans Frontieres and many other human rights organizations have recognized as an unfolding genocide in Gaza.² Funding what is known to be an unfolding genocide makes U.S. taxpayers complicit in supporting Israeli war crimes in Gaza. U.S. funds have also supported violations of the Fourth Geneva Convention’s prohibition against collective punishment and illegal apartheid system in Palestine.³
3. Efforts by TAG and Defense of Children International- Palestine to use the federal courts to challenge the U.S. government’s support for and use of their tax dollars for genocide have been systematically dismissed under the judicial doctrines of “political question” and “standing,” despite Article VI of the U.S. Constitution, which declares ratified treaties the “supreme Law of the Land.”
4. Consequently, TAG and other U.S. groups, including the Center for Constitutional Rights (CCR) and Democracy for the Arab World Now (DAWN)⁴ have turned to the international human rights arena to spotlight the U.S. perpetrators complicit in one of the worst violations of human rights since the U.S. ratified the UDHR and the Genocide Convention. The fact that these violations are funded by U.S. tax dollars makes taxpayers complicit in these crimes.
5. Despite the U.S. declaration in its 2015 UPR report that “We remain committed to improving implementation of our human rights obligations and commitments, through laws, policies, programs, training, and other mechanisms,”⁵ and the many international recommendations in past UPRs that the U.S. establish a national human rights institution to monitor and educate U.S. agencies and judges on their international human rights obligations,⁶ prior U.S. administrations have failed to follow through. Now, three months into the current administration, violations of U.S. international law obligations are escalating daily.
6. Recent actions of the Trump administration to “withdraw” from the Human Rights Council, sanction ICC personnel and criminalize anyone who assists in ICC investigations⁷ indicate that it will likely disregard its 2025 UPR obligations (as it has disregarded its obligations to its own Constitution) and its obligations under international human rights treaties it has ratified.

7. As the repression against human rights defenders increases with the recent abduction and detention and threatened deportation of Columbia University student Mahmoud Khalil and repression of an increasing number of advocates for ceasefire and Palestinian rights, this review may be the last opportunity for U.S. civil society to use the UPR forum to protest the U.S. government's failure to uphold the human rights instruments it has signed and ratified.

B. CONGRESSIONAL VOTES APPROPRIATING U.S. TAX DOLLARS TO FUND A GENOCIDE.

8. Since late October 2023, polls have shown that an increasing number of U.S. voters oppose support for Israel's war on the Gazan people. Between November 2023 and mid-March 2024, approval of Israel's military action in Gaza dropped from 50% to 36%, with 55% disapproving.⁸
9. On April 20, 2024, 366 of 433 members of the U.S. House of Representatives [voted](#) to send an additional \$26.38 billion to Israel, primarily for military aid.
10. Three days later, 79 of 100 Senators concurred.⁹ In doing so, they violated restrictions on Congress' spending power in the Constitution, federal laws restricting military assistance to armed forces known to be violating human rights, the Fourth Geneva Convention prohibition of collective punishment, the International Convention on the Elimination of All Forms of Racism and Discrimination's prohibition of apartheid,¹⁰ and, of course, the Convention on the Prevention and Punishment of the Crime of Genocide, all of which are deemed the "supreme Law of the Land" under Article VI of the Constitution.
11. The April congressional votes were taken in the face of overwhelming evidence that the Israeli military was carrying out genocide in Gaza with U.S.-provided weapons and munitions. On January 26, 2024, nearly three months earlier, ICJ had [ruled](#) that the [charge](#) of genocide against the Israeli government was plausible and should not be dismissed, and that the case should proceed for ongoing litigation.¹¹ On February 26, 2024, almost two months before the votes in Congress, the pre-eminent human rights organization, Amnesty International, issued a report finding that the Israeli government was committing genocide in Gaza.¹² Human Rights Watch made the same [finding](#) the following week.¹³ Both organizations found that the Israeli government was systematically starving the people of Gaza by cutting off food aid, water and electricity and by bombing and military occupation, and was using U.S. weapons to inflict massive death and destruction on the civilian population of Gaza. On March 24, 2024, almost one month before the votes in Congress, Francesca Albanese, the UN Special Rapporteur on the Situation of Human Rights in the Palestinian Territories, issued a comprehensive [report](#), finding unequivocally that the Israeli government had crossed the "threshold" and was actively committing genocide in Gaza.¹⁴
12. The reports and testimonies provided here, offered by UN bodies and rapporteurs, human rights officials, aid workers, genocide experts and journalists in Gaza, that documented and demonstrated a genocide was occurring and intensifying in Gaza before Congress authorized more than \$26.38 billion of primarily military aid and weapons sales to Israel,

are but a small sample of the evidence of the overwhelming evidence of genocide.

13. In addition to the violation of its international obligations, this allocation of U.S. funds by Congress for what was clearly known to be a genocide violates the constitutional restriction in Article I, Section 8 of the Constitution that funds are to be allocated only for debt repayment, “the general welfare” or “common defense.”
14. Article VI, Section 2 of the Constitution establishes that ratified treaties are the “supreme Law of the Land.” In 1988, the U.S. government finally ratified the [Genocide Convention](#), one month after Congress passed the [Genocide Convention Implementation Act](#) of 1987, making genocide a federal crime. Article 3 of the convention established “complicity in genocide” as a crime. Congress, itself complicit, has made U.S. taxpayers complicit in the Gaza genocide, as documented in the [report](#) *America’s Complicity in the Crime of Genocide in Gaza* published by the Research Society of International Law on May 29, 2024.¹⁵
15. Additionally, by allocating U.S. dollars to fund the genocide in Gaza, Congress is violating federal statutes, including the Leahy Law, which requires the State Department to block U.S. assistance to foreign security forces responsible for gross violations of human rights.¹⁶ For years, it has been well documented by journalists, human rights advocates and State Department staff that the U.S. State Department has failed to uphold the Leahy Law when it comes to U.S. military aid to Israel.¹⁷ This failure recently led the U.S.-based human rights organization Democracy for the Arab World Now (DAWN) to file a [lawsuit](#) on behalf of Palestinian families under the Administrative Procedures Act, specifically demanding that the State Department enforce the Leahy Law.¹⁸ As Stephen Rickard, a former State Department official and former senior staff for the Senate Foreign Relations Committee, who helped pass the Leahy Law and worked on and monitored its implementation for more than a quarter of a century, stated regarding its implementation: “There is only one country where the Department of State has a ‘see no evil, hear no evil’ policy: Israel.”¹⁹
16. Congress is certainly not alone in flouting U.S. and international law by aiding and abetting the genocide in Gaza. Presidents Biden and Trump and their executive branch officials have consistently supported the illegal use of U.S. tax dollars and other funds, justifying Israel’s genocide and war crimes before the UN Security Council as “self-defense.” The Biden administration fast-tracked weapons sales, authorized billions more in military aid and consistently used its veto power in the UN Security Council to undermine any real ceasefire resolution that could have prevented the widespread death and destruction.
17. The U.S. is Israel’s biggest supplier, providing an estimated 68% of its foreign-sourced weapons.²⁰ This Genocide of the Palestinian people is primarily funded by the U.S. government.²¹ And now, with the January 2025 ceasefire agreement broken on March 12 by Israel’s renewed blockade of food and water, followed by resumed bombing on March 16, President Trump has enthusiastically supplied \$12 billion in additional weapons, and the U.S. Congress is currently in the process of allocating yet another \$8 billion in weapons sales to Israel.²²

18. In its first few weeks, the Trump administration rescinded the Biden limit on shipping 2,000-pound bombs and sent billions more in weapons to the Israeli military in time for the latest assault on Gaza. At the same time, President Trump openly called for a U.S. takeover of the Gaza Strip for a “beautiful” resort, which would require ethnic cleansing and removal of the Palestinian population. The idea has been roundly rejected by the international community and the Palestinian people who have lived there with such steadfastness for so many years.²³

C. TAG LAWSUIT

19. After nearly a year of calling, emailing, protesting outside their offices and attempting to meet with their congressional representatives to persuade them – to no avail – to stop funding the genocide in Gaza, human rights advocates throughout Northern California united to form Taxpayers Against Genocide in fall 2024.
20. The attached Annex A includes signed statements by TAG plaintiffs, describing their unflagging but futile efforts to be heard by their congressional representatives. “I experience grief, trauma, and guilt due to my forced complicity in displacing hundreds of thousands of people, maiming and orphaning children, and all the other horrors directly related to his [Congressman Huffman's] vote to send more arms.” TAG class member Carol Bloom.²⁴
21. Palestinian TAG Plaintiff, Mama Ganuush said: “Since October 2023, I have lost 211 family members, including my cousin Mohamed Al Ashy, to the ongoing genocide in Gaza. I reached out to *[my congressional representatives]* Nancy Pelosi and Alex Padilla multiple times, begging for their intervention to stop the bloodshed and to help save my family. Instead of providing support, they ignored my cries for help, voted for additional funding for weapons, and actively supported policies that further enabled Israel’s genocidal campaign against Palestinians.”²⁵
22. Tarik Kanaana, an American born Palestinian TAG plaintiff shared, “I have witnessed the destruction of parts of my history and parts of the beautiful culture of which I am a product. I have witnessed the bombing of hospitals and schools, churches, mosques, playgrounds, and seaside promenades....By voting to spend my tax dollars to fund and supply the weapons Israel is using to commit genocide against my own people, Mike Thompson my representative in Congress has made me complicit in this most brutal and deadly attack on my people and the destruction of my homeland.”²⁶
23. On December 19, 2024, the TAG taxpayers filed a class action in federal court for the Northern District of California to challenge the allocation of their tax dollars for military aid to Israel. They sought a judicial declaration that their Congress members votes to provide military aid to Israel were illegal and they had made them complicit in the genocide in Gaza, in violation of Article 3(e) of the Convention on the Prevention and Punishment of the Crime of Genocide, ratified by the U.S. in 1988, which expressly prohibits “complicity in genocide.”¹
24. The taxpayers’ lawsuit began with 21 named class representatives and over 500 class members against two elected members of the U.S. House of Representatives, whose

districts span 10 Northern California counties, for their votes in favor of the April 2024 allocation of \$26.38 billion in primarily military aid to Israel in the Israel Supplemental Security Act.²⁷

25. Media attention to the TAG lawsuit sparked national interest,²⁸ and the number of plaintiffs kept growing. On January 17, 2025, the lawsuit expanded to 48 class representatives and nearly 2,000 class members throughout 18 counties in Northern California, and was amended to include four additional Congress members, including the two U.S. senators from California who also voted for the funding, and U.S. Secretary of Defense Lloyd Austin, who oversaw and carried out the delivery of the weapons.²⁹
26. The testimonies in the attached Annex A constitute a small sample of the common experience of people of conscience from across the U.S. chronicling their frustrating attempts to persuade or even meet with their congressional representatives to discuss their opposition to funding the genocide. Even “liberal” – on everything but Palestine – Democrats (like the TAG defendants, Nancy Pelosi and Jared Huffman) failed to respond.
27. On January 25, 2025, plaintiffs convened a national webinar for others interested in filing similar class action lawsuits in their districts; more than 1,100 people from 40 different states registered, demonstrating the nationwide interest in using the courts to hold U.S. officials accountable.
28. TAG’s legal claims against the elected officials were based on their failure to exercise what’s known as “tax and spend” authority, laid out by Article I, Section 8 of the Constitution. Funding a known genocide does not qualify as the “general welfare” of anyone or the “common defense” of America.
29. The plaintiffs also sought a declaration that the military aid spending legislation was unconstitutional on grounds it violated the Convention on the Prevention and Punishment of the Crime of Genocide, ratified by the U.S. in 1988, and the U.S. Genocide Convention Implementation Act, both of which prohibit complicity in genocide; and Article VI, Section 2 of the U.S. Constitution: “All Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding.”
30. On February 10, 2025, the judge dismissed the TAG lawsuit for lack of jurisdiction, saying it presented a “political question.” He concluded that he was unable to even consider the “general welfare” restriction for congressional funding in Article I or enforcement of the Genocide Convention and its implementing legislation. The TAG complaint had encountered the same obstacle that other lawsuits challenging U.S. support for Israel’s illegal actions have: a refusal to entertain the argument, found to be “non-judicial under the political question doctrine.”
31. Ironically, in dismissing the TAG case, the judge cited as precedent the decision in *Corrie v Caterpillar* (9th Cir 2007) 503 F3d 974, which involved the murder of U.S. volunteer Rachel Corrie. Rachel was killed in 2003 by a bulldozer while trying to protect

a Palestinian family home in Gaza from demolition by Israeli soldiers. The bulldozers had been acquired by the Israeli military in a U.S.-sponsored sale with full knowledge that they would be used to demolish Palestinian homes, in violation of international law. Although the case was brought against a private company and despite the Israeli military's apparent disregard of a U.S. citizen's life, the lawsuit was dismissed as involving a "political question" because the U.S. had paid for the bulldozers and their sale therefore implicated U.S. foreign policy.

D. POLITICAL QUESTION DOCTRINE

32. Dismissal of the TAG lawsuit came a few months after dismissal of another case in the same federal district court, brought by a group of NGOs and individuals whose families were being decimated in the ongoing genocide in Gaza. In *Defense for Children International-Palestine v. Biden*, the plaintiffs alleged that the defendants – then-President Biden, Antony Blinken, then Secretary of State, and Lloyd Austin, then Secretary of Defense – violated their obligations “to prevent” genocide under customary international law and Article I of the Genocide Convention; and that the United States’ provision of military, diplomatic and financial support to the Israeli government made it complicit in genocide in violation of Article III(e) of the Genocide Convention and its implementing legislation.³⁰ Although the court acknowledged that the evidence provided may “plausibly constitute a genocide,” it felt compelled to dismiss the lawsuit on the grounds that it presented “fundamentally non-justiciable political questions.”³¹
33. The Ninth Circuit Court of Appeals affirmed the dismissal, holding that “plaintiffs’ complaint presented nonjusticiable political questions ... grounded in matters committed to those branches of the government that exercise military and diplomatic prerogatives.”³²
34. The appellate court stated in *Corrie v. Caterpillar, Inc.*, that the political question doctrine “is primarily a function of the separation of powers. ... [internal citation omitted] The Supreme Court has indicated that disputes involving political questions lie outside the Article III jurisdiction of federal courts.”³³
35. In fact, unlike the tepid but essential judicial restraint currently being applied to the Trump administration’s domestic violations,³⁴ U.S. courts have consistently invoked the doctrines of “standing” and “political question” to stand back and permit the president and Congress to support mass murder in Palestine, with no limit, no remedy and no accountability under the Constitution, statutes, treaty obligations or international law. Human rights and constitutional legal limits on federal power are rendered nugatory when it comes to U.S. support for Israel.
36. Due to the “political question” doctrine and “standing” restrictions, there is essentially no way American taxpayers, genocide victims or American victims of murder by bulldozer can use the federal courts and the “supreme Law of the Land” per Article VI, to challenge U.S. complicity in Israel’s war crimes in Palestine.

E. CITIZENS UNITED and CORRUPTION IN U.S. ELECTIONS

37. The United States is a federal republic – and pursuant to the Constitution, representatives are elected by the people in districts to vote on funding for foreign and domestic matters. One might think that an option for Americans who seek to challenge their congressional representatives would be to simply vote them out. But it is abundantly clear that when it comes to Israel and certain other issues subject to intense lobbying and campaign funding, such as military spending and weapons provision,³⁵ U.S. elections simply do not ensure accountability of congressional representatives to the wishes of the majority of their constituents or to their human rights obligations under international law. (See attached Annex B for details on lobbying and funding by weapons manufacturers.)
38. Congress members who criticize Israel are regularly “primaried,” targeted by pro-Israel organizations and political action committees (PACs) managed by the American Israel Public Affairs Committee (AIPAC), Christians United for Israel (CUFI), Democratic Majority for Israel (DMFI) and several others. Candidates who fail to toe the line on Israel are simply shut out of the process. For example, pro-Israel PACs spent a combined \$25 million on ads last year to defeat the most vocal congressional proponents of a ceasefire in Gaza. Reps. Jamaal Bowman in New York and Cori Bush in Missouri lost their races in the two most expensive House primary elections in U.S. history.³⁶
39. A Guardian analysis found that U.S. lawmakers who were more supportive of Israel at the start of the Gaza war received over \$100,000 more on average from pro-Israel donors in their last election than those who backed Palestine. The analysis compared campaign contributions to members of Congress with their statements on the war through mid-November. About 82% supported Israel, while only 9% backed Palestine. Pro-Israel lawmakers averaged \$125,000 in donations; pro-Palestine lawmakers averaged \$18,000. Over \$58 million of pro-Israel donor contributions went to current Congress members, and all but 33 received donations.³⁷
40. Then-majority leader/now minority leader Chuck Schumer and former House Speaker/now Rep. Nancy Pelosi close ties with Israel and support for Israel’s genocide must be viewed in the context of the financial contributions they receive from the pro-Israel lobby. The Open Secrets research organization has calculated that they had received \$1,727,974 and \$617,270 respectively from the pro-Israel lobby from 1990 to November 2024.³⁸
41. Not surprisingly, Schumer and Pelosi led the Democratic Party support in the April 2024 vote for \$26.8 billion in mostly military aid for Israel’s ongoing genocide in Gaza. This is in addition to the \$3.8 billion Israel receives every year, more than any other recipient of U.S. military aid. In the final House vote 366 representatives out of 433 supported the aid. Three days later, 79 of 100 Senators concurred.³⁹
42. Former House Speaker Pelosi’s disdain for her constituents is on record. She made untrue and harmful accusations about her protesting constituents as “antisemitic” and accused them of working for China and Russian President Putin.⁴⁰ “For them to call for a ceasefire is Mr. Putin’s message,” she said in January 2024. “Make no mistake, this is directly connected to what he would like to see.”⁴¹ On October 7, 2024, Pelosi remarked on her website, “America stands unwaveringly with the Israeli people and supports the right of Israel to defend herself.”⁴²

43. Understanding how the 2010 Supreme Court decision in *Citizens United* fundamentally altered the extent to which elected representatives are and must be responsive to their constituents' demands, is crucial to this report's assertions— that redress for opposition to U.S. complicity in genocide is unavailable. The ability of corporations and individuals to influence U.S. elections and elected officials has evolved dramatically since the early 20th century. In 1907, Congress passed the Tillman Act to bar direct contributions from corporations to electoral candidates.⁴³ To avoid this ban, corporations formed PACs funded by donations from stockholders and employees that contributed directly to a politician or political party. Congress enacted legislation in 1971 to limit PAC contribution amounts and require disclosure.⁴⁴ In 1978, the Supreme Court decided that corporate contributions to ballot initiative campaigns constituted protected free speech but noted that it was not establishing a comparable right regarding candidates for political office.⁴⁵
44. In the sharply divided 2010 opinion *Citizens United v. Federal Election Commission* (2010) 558 U.S. 310), the Supreme Court overturned prior decisions and allowed unlimited corporate spending for elections on the grounds of “corporate free speech.”
45. Shortly thereafter, the D.C. Circuit Court of Appeals relied on *Citizens United* to rule that individual contribution limits to PACs for “independent expenditures” (spending “not made in concert or cooperation with, or at the request or suggestion of, a candidate, candidate's campaign, or political party”) are also unconstitutional under the First Amendment.⁴⁶
46. These two decisions led to the rise of “super PACs,” which can receive unlimited and undisclosed contributions for electoral candidates from corporations and individuals alike and are not subject to the same disclosure requirements as other PACs, as long as they do not coordinate with the candidate. As recognized in the dissenting opinion in *Citizens United*, corporations now have legal sanction to corrupt and undermine U.S. democracy by spending untold amounts of money on elections while keeping the sources of the funding in the dark.
47. What this history demonstrates is that the U.S. electoral system has been corrupted by secret funding and provides no effective accountability for citizens and taxpayers who seek to avoid complicity in genocide, apartheid and war crimes and implement their country's obligations under international human rights and humanitarian law. Now that the country is in the grip of a “trifecta” of control (all three branches of government, including both houses of Congress) by forces that simply deny U.S. international human rights obligations altogether, voters who oppose U.S. support for genocide and apartheid (the majority) are left with no remedy but marching in the streets and shaming their leadership in international fora.⁴⁷

F. PROTEST AND REPRESSION AND USE OF FEDERAL FUNDING TO COERCE UNIVERSITIES TO SUPPRESS CAMPUS SPEECH ASSERTING PALESTINIAN RIGHTS.

48. As the Gaza genocide proceeds apace, even marching in the streets and speaking out at protests and in the media have become dangerous for those who protest the use of their tax dollars for genocide and seek to defend the rights of Palestinians. Trump's January 2025 executive order on "Additional Measures to Combat Antisemitism" marks a dangerous escalation in this trend. The order directs multiple federal agencies to "prosecute, remove, or otherwise hold to account the perpetrators of unlawful anti-Semitic harassment and violence." Universities and jurisdictions all over the U.S. have been pressured with loss of federal funding if they fail to crack down on political protest and fail to use the contested IHRA (International Holocaust Remembrance Alliance) redefinition of antisemitism in dismissing and sanctioning students and faculty for their protests and speech, inaccurately conflating criticism of Israel's oppression of Palestinians with hatred of Jews.⁴⁸ The "Palestine exception" to free speech is jeopardizing the human right to free expression and the academic freedom that Americans cherish.
49. Frequently brutal repression suffered by peaceful protesters of the Gaza genocide between October 7 and December 31, 2023, was documented in a comprehensive report by the respected human rights law firm Palestine Legal, *Reverberations of October 7: Mobilization Against Genocide Undeterred by Peak Anti-Palestinian Repression*.⁴⁹ Since then, as Palestine Legal notes, the repression has only escalated with the escalation of the Gaza genocide.

The report comes as universities continue to summon state, local, and campus police to brutally crack down on student activists on a scale not seen in decades. Within the last month alone, university administrators called in law enforcement to [arrest over 3,000 students, professors, and solidarity activists](#) on more than 80 campuses. ... In recent weeks, as student-led demonstrations in support of Palestinian freedom continue undeterred in the form of encampments and sit-ins on campuses across the country, the repression has also grown in severity. Students and supporters are confronting [mass arrests, threats of expulsion, evictions, brutal police crackdowns](#), Zionist [mob violence](#), as well as dangerous Zionist [lawfare efforts](#) targeting students and other advocacy as 'support for terrorism'.⁵⁰

50. In a joint letter on October 31, 2024, to U.S. universities and colleges, Amnesty International, Human Rights Watch and the American Civil Liberties Union expressed concern over this ongoing pattern of repression.⁵¹ The letter documents reports of illegal and violent repression, stating that "student protesters were often met with police in full body armor who used physical force, including batons, kinetic impact projectiles such as rubber bullets and foam tipped rounds, and chemical irritants such as pepper spray and, in at least three instances, tear gas." The letter also quotes the UN special rapporteur on education, who said during an official visit to the U.S. in May 2024:

I am deeply troubled by the violent crackdown on peaceful demonstrators, arrests, detentions, police violence, surveillance and disciplinary measures and sanctions against members of the educational community exercising their right to peaceful assembly and freedom of

expression. ... These attacks signal a concerning erosion of intellectual freedom and democratic principles within educational settings.⁵²

51. The repression is clearly intensifying under the Trump administration, starting with the abduction and temporary disappearance and ongoing detention of Palestinian permanent resident (green card holder), graduate student, advocate for Palestinian rights and peace negotiator at Columbia University, Mahmoud Khalil, on March 8, 2025. As Khalil's (U.S. citizen) wife was nearing the due date for the birth of their first child, he was whisked off to an ICE detention prison in Louisiana, 1,300 miles from their home.⁵³ He languishes there as of this date, while the Trump Department of "Justice" fights his habeas corpus petition. The secretary of state and attorneys for the Trump administration have justified Khalil's treatment by citing a seldom-used provision in a McCarthy-era immigration statute that allows the secretary of state to deport a legal immigrant "whose presence or activities in the United States the Secretary of State has reasonable grounds would have potentially serious adverse foreign policy consequences."⁵⁴ The law provides for no check on such "determination" – and ironically, the law was found to be unconstitutional in 1996 by U.S. District Judge Maryanne Trump Barry, the late sister of President Trump.⁵⁵ The abuses of the McCarthy era and the infamous "black sites" of the Afghanistan and Iraq wars have apparently resurfaced inside today's United States.
52. Shortly after Khalil's abduction, President Trump announced that it was the first of "many to come." And indeed, every day there are more reports of arrests, detentions, denials and removals of visas of individuals who have expressed opposition to U.S. support for the Gaza genocide, including Badar Khan Suri and Rumeysa Ozturk, to name just two.⁵⁶ On March 20, 2025, nine UN special rapporteurs issued a demand at a UNHRC press conference that the U.S. government stop persecuting Mahmoud Khalil and others who peacefully protest U.S. support for the genocide in Gaza.⁵⁷
53. The government repression and targeting of those who speak out about the ongoing genocide has created a chilling effect on this very UPR submission. In fact, six of the TAG plaintiffs, including several naturalized citizens, who made statements for Annex A have withdrawn them, and one of the endorsing organizations withdrew for fear of retaliation.
54. Perhaps more serious for the free speech and academic freedom rights of students and faculty is the Trump administration's newly unleashed extortionate threat to withhold essential federal funding from universities if they don't militarize their campuses and adopt the widely disputed IHRA redefinition of antisemitism. Mahmoud Khalil's campus, Columbia University, was the first to feel the hammer, threatened with an immediate cutoff of \$400 million in federal grants and research funds. Within days, the university administration caved to the Trump administration's demands. The administration announced plans to repeat the extortion on 60 campuses that it asserts haven't cracked down enough on anti-genocide protests.
55. A dangerous precedent is being established – in full violation of the U.S. Constitution, the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights – that the United States, one of the original signatories and authors of the UDHR, can arbitrarily abduct, arrest, detain and deport legal residents simply on the basis

of their peaceful expression of opposition to genocide – and use the threat of losing U.S. funds to coerce university administrations, students and faculty into compliance with repressive policies and other flagrant violations of international and domestic law.

G. CONCLUSION

56. With insurmountable obstacles to accountability in the U.S. electoral and judicial systems and an increasing disregard of international human rights and humanitarian law by the U.S. government, intervention and oversight by the UN Human Rights Council is urgently needed to challenge U.S. repression and the impunity of U.S. legislators and officials for aiding and abetting genocide with U.S. tax dollars.
57. U.S. military and diplomatic support for the genocidal destruction of Gaza and the apartheid regime in the occupied Palestinian territories is widely condemned by people of conscience and international bodies. In March 2025, a report was issued to the Human Rights Council by the UN Commission of Inquiry on the Occupied Palestinian Territories on the systematic use of sexual, reproductive and other gender-based violence by Israeli security forces since October 7, 2023. The report found that the targeted destruction of reproductive healthcare facilities – including the destruction of 4,000 frozen embryos – is further evidence of the genocidal intent of Israel to eliminate the Palestinian population in Gaza.⁵⁸
58. In submitting this report, TAG, NLG, IADL and our endorsing organizations join with the chorus of voices across the U.S. and internationally, Jews, Palestinians and all who are compelled to expose and fight against genocide: **Not in our name, never again!**

59. Recommendations to the U.S. government

- Stop funding genocide and war crimes in violation of U.S. and international law;
- Stop prosecuting, persecuting, deporting and threatening advocates for Palestinian self-determination and protesters against genocide;
- Institute effective judicial safeguards against U.S. funding and support of genocide and war crimes;
- Establish a National Human Rights Institute to train legislators, judges and federal agency directors in international humanitarian and human rights law and the supremacy of all U.S.-ratified human rights treaties under Article VI of the U.S. Constitution;
- Honor the principles of academic freedom: Stop pressuring universities to police the protected speech of faculty and students; and do not threaten to cut funding in pursuit of a political agenda that violates international law;
- Take all necessary measures to ensure independent and effective oversight of U.S. treaty obligations;
- Sign and ratify the Rome Statute for the International Criminal Court, eliminate sanctions against court personnel and encourage cooperation with ICC investigations.

¹ *International Law Commission, Report of the International Law Commission*, Official Records, Seventy-Fourth Session Supplement, A/74/10, (2019) <https://legal.un.org/ilc/reports/2019/english/chp5.pdf>

² See for example:

International Court of Justice, *Summary of the Order of 26 January 2024*, (Jan. 26, 2024), <https://www.icj-cij.org/node/203454>;

International Criminal Court, *Situation in the State of Palestine: ICC Pre-Trial Chamber I rejects the State of Israel's challenges to jurisdiction and issues warrants of arrest for Benjamin Netanyahu and Yoav Gallant* (Nov. 21, 2024), <https://www.icc-cpi.int/news/situation-state-palestine-icc-pre-trial-chamber-i-rejects-state-israels-challenges>;

Amnesty International, *Israel/Occupied Palestinian Territory: "You Feel Like You Are Subhuman": Israel's Genocide Against Palestinians in Gaza* (Dec. 5, 2024),

<https://www.amnesty.org/en/documents/mde15/8668/2024/en/>;

Human Rights Watch, *Israel's Crime of Extermination, Acts of Genocide in Gaza* (Dec. 19, 2024),

<https://www.hrw.org/news/2024/12/19/israels-crime-extermiation-acts-genocide-gaza>;

Medecins Sans Frontieres, *Gaza: Life in a Death Trap* (Dec. 19, 2024),

<https://www.doctorswithoutborders.org/latest/gaza-death-trap-msf-report-exposes-israels-campaign-total-destruction>.

³ International Court of Justice, *Legal Consequences Arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, Including East Jerusalem* (July 19, 2024), <https://www.icj-cij.org/sites/default/files/case-related/186/186-20240719-adv-01-00-en.pdf>;

Center for Constitutional Rights, *Request for Early Warning Measures and Urgent Action Procedures to the United Nations Committee on the Elimination of Racial Discrimination in Relation to the United States of America and Canada* (Feb. 18, 2025),

<https://ccrjustice.org/sites/default/files/attach/2025/02/CERD%20Early%20Warning%20and%20Urgent%20Action%20-%20U.S.%20and%20Canada%20-%20202-18-25-corrected.pdf>.

⁴ DAWN, *International Criminal Court: Investigate Biden, Blinken, and Austin for Aiding and Abetting Israeli Crimes in Gaza* (Feb. 24, 2025), <https://dawnmena.org/international-criminal-court-investigate-biden-blinken-and-austin-for-aiding-and-abetting-israeli-crimes-in-gaza/>.

⁵ U.S. Department of State, *Report of the United States of America Submitted to the U.N. High Commissioner for Human Rights in Conjunction with the Universal Periodic Review* (Feb. 6, 2015), <https://2009-2017.state.gov/j/drl/upr/2015/237250.htm>.

⁶ United Nations Human Rights Council, *National Report Submitted in accordance with Paragraph 5 of the Annex to Human Rights Council Resolution 16/21, United States of America* (May 4-15, 2015), <https://documents.un.org/doc/undoc/gen/g15/024/66/pdf/g1502466.pdf>.

⁷ The White House, *Imposing Sanctions on the International Criminal Court* (Feb. 6, 2025), <https://www.whitehouse.gov/presidential-actions/2025/02/imposing-sanctions-on-the-international-criminal-court/>

⁸ Jeffrey M. Jones, *Majority in U.S. Now Disapprove of Israeli Action in Gaza*, Gallup (Mar. 27, 2024), <https://news.gallup.com/poll/642695/majority-disapprove-israeli-action-gaza.aspx>.

⁹ Matt Stiles, *How Each Senator Voted on the \$95 Billion Foreign Aid Package*, CNN (April 30, 2024), <https://www.cnn.com/2024/04/23/politics/senate-vote-israel-ukraine-aid-dg/index.html>.

¹⁰ Center for Constitutional Rights, *Request for Early Warning Measures and Urgent Action Procedures to the United Nations Committee on the Elimination of Racial Discrimination in Relation to the United States and Canada* (Feb. 18, 2025), <https://ccrjustice.org/us-government-and-compliance-cerd-treaty>.

- ¹¹ International Court of Justice, *Summary of the Order of 26 January 2024* (Jan. 26, 2024), <https://www.icj-cij.org/node/203454>.
- ¹² Amnesty International, *Israel Defying ICJ Ruling to Prevent Genocide by Failing to Allow Adequate Humanitarian Aid to Reach Gaza* (Feb. 26, 2024), <https://www.amnesty.org/en/latest/news/2024/02/israel-defying-icj-ruling-to-prevent-genocide-by-failing-to-allow-adequate-humanitarian-aid-to-reach-gaza/>.
- ¹³ Human Rights Watch, *Israel Not Complying with World Court Order in Genocide Case* (Feb. 26, 2024), <https://www.hrw.org/news/2024/02/26/israel-not-complying-world-court-order-genocide-case#:~:text=>
- ¹⁴ Francesca Albanese, *Anatomy of a Genocide: Report of the Special Rapporteur on the Situation of Human Rights in the Palestinian Territories Occupied since 1967*, United Nations (Mar. 25, 2024), <https://www.un.org/unispal/document/anatomy-of-a-genocide-report-of-the-special-rapporteur-on-the-situation-of-human-rights-in-the-palestinian-territory-occupied-since-1967-to-human-rights-council-advance-unedited-version-a-hrc-55/>
- ¹⁵ Abdullah Mohsin, *America's Complicity in the Crime of Genocide in Gaza*, Research Society of International Law (May 29, 2024), <https://rsilpak.org/2024/americas-complicity-in-the-crime-of-genocide-in-gaza/>.
- ¹⁶ U.S. Department of State, *About the Leahy Law: Fact Sheet* (Jan..20, 2025), <https://www.state.gov/bureau-of-democracy-human-rights-and-labor/releases/2025/01/leahy-law-fact-sheet>.
- ¹⁷ Ali Harb Ali, *How U.S. Violates Its Own Leahy Law to Ensure Military Support for Israel*, Al Jazeera (May 2, 2024), <https://www.aljazeera.com/news/2024/5/2/how-us-violates-its-own-leahy-law-to-ensure-military-support-for-israel>.
- ¹⁸ DAWN, *United States: Palestinian Families Sue State Department to Suspend U.S. Military Assistance to Abusive Israeli Security Forces* (Dec. 17, 2024), <https://dawnmena.org/united-states-palestinian-families-sue-state-department-to-suspend-u-s-military-assistance-to-abusive-israeli-security-forces/>.
- ¹⁹ Ibid.
- ²⁰ Robert Tait, *Which Countries Supply Israel with Arms and Why Is Biden Reluctant to Stop?*, The Guardian (April 9, 2024), <https://www.theguardian.com/world/2024/apr/09/us-israel-weapons>.
- ²¹ Yossi Melman, *Israeli Air Force Official: Without U.S. Aid, Israel Couldn't Fight Gaza Beyond a Few Months*, Haaretz (Sep. 2, 2024), <https://www.haaretz.com/israel-news/2024-09-02/ty-article-magazine/.premium/without-u-s-aid-israel-would-have-struggled-to-fight-in-gaza-beyond-a-few-months/00000191-aec2-d875-a3bb-aed7e2e30000>.
- ²² Ethan Mayer-Rich, *Trump Sidesteps Congress, Giving Billions to Israel*, Arab Center, Washington DC (Mar. 7, 2025), <https://arabcenterdc.org/resource/trump-sidesteps-congress-giving-billions-to-israel/>.
- ²³ Emma Graham-Harrison and Malek A. Tantesh, *Palestinians in Gaza on Trump's Plan: 'We Would Rather Die Here than Leave'*, The Guardian (Feb. 5, 2025), <https://www.theguardian.com/world/2025/feb/05/palestinians-react-to-trump-plan-for-gaza>.
- ²⁴ Annex A, Statement of Carol Bloom, p. 5.
- ²⁵ Annex A, Statement of Mama Ganiuush, pp. 2-3.
- ²⁶ Annex A, Statement of Tarik Kanaana, p. 6.
- ²⁷ U.S. House of Representatives, *Houses Passes Series of Security Supplemental Bills* (April 22, 2024), <https://appropriations.house.gov/news/press-releases/house-passes-series-security-supplemental-bills>.
- ²⁸ For an inventory of press coverage, see <https://www.taxpayersagainstgenocide.org/press>.
- ²⁹ Ibid.

³⁰ *Defense for Children International-Palestine, et al. v. Biden, et al.*, No. 4:2023cv05829 (N.D. Cal. 2024).

³¹ Ibid.

³² Justia U.S. Law, *Defense for Children International-Palestine, et al. v. Biden, et al.*, No. 24-704 (9th Cir. 2024). <https://law.justia.com/cases/federal/appellate-courts/ca9/24-704/24-704-2024-07-15.html>

³³ *Corrie v Caterpillar, Inc.* (9th Cir, 2007) 503 F 3d 974, 980 (“The Supreme Court has indicated that disputes involving political questions lie outside of the Article III jurisdiction of federal courts. See *Schlesinger v. Reservists Comm. to Stop the War* (1974) 418 U.S. 208, 215, 94 S.Ct. 2925 (“[T]he concept of justiciability, which expresses the jurisdictional limitations imposed upon federal courts by the ‘case or controversy’ requirement of Art. III, embodies ... the political question doctrine [].”) (citing *Flast v. Cohen* (1968) 392 U.S. 83, 95, 88 S.Ct. 1942.))

³⁴ To cite one example, see Michael Kunzelman and Lindsay Whitehurst, *Judge Rules DOGE’s USAID Dismantling Likely Violated the Constitution*, Associated Press (Mar. 18, 2025), <https://apnews.com/article/usaaid-federal-judge-trump-administration-bdc919a5d98eda5ab72a32fdfe2f147d>.

³⁵ For example, see Brett Murphy, *Inside the State Department’s Weapons Pipeline to Israel*, ProPublica (Oct.4, 2024), <https://www.propublica.org/article/israel-gaza-america-biden-administration-weapons-bombs-state-department>.

³⁶ Rich Mendez, Emily Ngo, and Nick Resiman, *Jamal Bowman Is Ousted in Most Expensive House Primary Ever*, Politico (Jun.25, 2024), <https://www.politico.com/news/2024/06/25/jamaal-bowman-loses-george-latimer-00164997>;

Nicholas Wu, *Cori Bush Becomes Second Squad Member Ousted in a Primary*, Politico (Aug. 7, 2024), <https://www.politico.com/news/2024/08/06/cori-bush-primary-election-loss-00173000>.

³⁷ Ibid.

³⁸ OpenSecrets, last accessed April 1, 2025,

<https://www.opensecrets.org/industries/summary?cycle=All&ind=Q05&recipdetail=H&t0-search>;

E.J. Dionne Jr., *Schumer said out loud what many of Israel’s friends are thinking*, Washington Post, (March 16, 2024), <https://www.washingtonpost.com/opinions/2024/03/16/schumer-israel-gaza-netanyahu/> (“It’s hard to find anyone who has been as pro-Israel as Schumer during his 43-year congressional career.”)

³⁹ Sharon Zhang, *\$26B in Unconditional Aid to Israel Passes House With Just 58 Voting Against*, Truthout (April 22, 2024) <https://truthout.org/articles/26b-in-unconditional-aid-to-israel-passes-house-with-just-58-voting-against/>

⁴⁰ Emma Bowman, *Pelosi accuses some protesters demanding Gaza cease-fire of having ties to Russia*, NPR, (Jan. 28, 2024), <https://www.npr.org/2024/01/28/1227487571/pelosi-gaza-fbi-ceasefire-protesters-russia>

⁴¹ Ibid.

⁴² Press Release, *Pelosi Statement on One Year Since October 7th Terror Attacks in Israel* (October 7, 2024), <https://pelosi.house.gov/news/press-releases/pelosi-statement-one-year-october-7th-terror-attacks-israel>

⁴³ (34 Stat. 864.)

⁴⁴ Federal Election Campaign Act (FECA), (52 U.S.C. § 30101, et seq.)

⁴⁵ *First National Bank of Boston v. Bellotti* (1978) 435 U. S. 765)

⁴⁶ *Speechnow.org v. Federal Election Commission* (D.C. Cir. 2010) 599 Fed.3d 686.

⁴⁷ Moira Donegan, *Aaron Bushnell Set Himself on Fire outside an Israeli embassy. It Is Our Loss He Is No Longer with Us*, *The Guardian* (Feb. 28, 2024), <https://www.theguardian.com/commentisfree/2024/feb/28/aaron-bushnell-self-immolation-gaza-israel> (A desperate active-duty U.S. airman, Aaron Bushnell, who felt hopeless to prevent further U.S. support for the Gaza genocide, famously self-immolated in front of the Israeli Embassy on Feb. 25,

2024).

⁴⁸ Itamar Mann and Lihi Yona, *The New Definition of Antisemitism Is Transforming America and Serving a Christian Nationalist Plan*, The Guardian (Mar. 23, 2025), <https://www.theguardian.com/us-news/ng-interactive/2025/mar/23/antisemitism-redefinition-jewish-safety-christian-nationalism-democracy>.

⁴⁹ Palestine Legal, *Reverberations of October 7: Mobilization Against Genocide Undeterred by Peak Anti-Palestinian Repression* (May 24, 2024), <https://palestinelegal.org/news/2024/5/23/new-report-analyzes-crackdown-on-palestine-solidarity-in-the-usnbsp>.

⁵⁰ Palestine Legal, *New Report Analyzes Crackdown on Palestine Solidarity in the U.S.* (May 24, 2024), <https://palestinelegal.org/news/2024/5/23/new-report-analyzes-crackdown-on-palestine-solidarity-in-the-usnbsp>.

⁵¹ ACLU, Amnesty International, and Human Rights Watch, *Joint Letter to Universities on Rights of Student Protesters* (Oct. 31, 2024), <https://assets.aclu.org/live/uploads/2024/10/Joint-Letter-to-Universities-on-Rights-of-Student-Protesters.pdf>.

⁵² Ibid.

⁵³ Isa Farfan, *Columbia Apologized to Mahmoud Khalil in May 2024 for One-Day Suspension*, The Intercept (Mar. 19, 2025), <https://theintercept.com/2025/03/19/columbia-mahmoud-khalil-suspension-gaza-protests/>.

⁵⁴ U.S. House of Representatives, *8 USC 1227: Deportable aliens* (updated as of Mar. 31, 2025), <https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title8-section1227&num=0&edition=prelim>.

⁵⁵ Stuart Anderson, *Trump's Sister Declared The Immigration Law He Used Unconstitutional*, Forbes (Mar. 19, 2025), <https://www.forbes.com/sites/stuartanderson/2025/03/19/trumps-sister-declared-the-immigration-law-he-used-unconstitutional/>.

⁵⁶ Associated Press, *A Look at the People Ensnared in Trump's Campaign against Pro-Palestinian Activism at U.S. Colleges*, (Mar. 28, 2025), https://www.washingtonpost.com/national/2025/03/27/immigration-detainees-students-ozturk-khalil/b256e71c-0b73-11f0-8e5e-3a8d70fc4250_story.html.

⁵⁷ UN Human Rights Office of the High Commissioner, *U.S. Must Immediately Release Palestinian-Rights Activist Mahmoud Khalil* (Mar. 20, 2025), <https://www.ohchr.org/en/press-releases/2025/03/us-must-immediately-release-palestinian-rights-activist-mahmoud-khalil-and>.

⁵⁸ The Independent International Commission of Inquiry on the Occupied Palestinian Territory, *"More than a Human Can Bear": Israel's Systematic Use of Sexual, Reproductive and Other Forms of Gender-Based Violence since 7 October 2023* (Mar. 13, 2025), <https://www.un.org/unispal/document/report-of-the-commission-of-inquiry-israel-gender-based-violence-13march2025/>.