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6 **UNITED STATES DISTRICT COURT**
7 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

8 DEFENSE FOR CHILDREN
9 INTERNATIONAL – PALESTINE; AL-
10 HAQ; AHMED ABU ARTEMA;
11 MOHAMMED AHMED ABU ROKBEH;
12 MOHAMMAD HERZALLAH; A.N.;
13 LAILA ELHADDAD; WAEIL ELBHASSI;
14 BASIM ELKARRA; and DR. OMAR EL-
15 NAJJAR

16 Plaintiffs,

17 v.

18 JOSEPH R. BIDEN, JR., *President of the*
19 *United States*, ANTONY J. BLINKEN,
20 *Secretary of State*, LLOYD JAMES
21 AUSTIN III, *Secretary of Defense*, in their
22 official capacities,

23 Defendants.

Case No.: 23-cv-05829

**BRIEF OF AMICUS CURIAE
PALESTINIAN JOURNALISTS'
SYNDICATE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION AND
OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS**

Hearing: January 26, 2024 at 9:00 a.m.

STATEMENT OF INTEREST

1
2 The Palestinian Journalists' Syndicate ("PJS"), established in 1979, is the only trade
3 union representing Palestinian journalists across the occupied Palestinian territory ("oPt",
4 which consists of Gaza and the West Bank, including East Jerusalem) and abroad. All
5 accredited Palestinian journalists in Gaza are members of PJS and have obtained their
6 journalist credentials from PJS. There are approximately 3,000 Palestinian journalists and
7 media workers in the oPt, about 1,200 of whom were based in Gaza at the start of the
8 genocide.
9

10 PJS seeks to support and facilitate the work of Palestinian journalists within the
11 framework of Palestinian self-determination, the national Palestinian policy agenda, and
12 journalism's professional code of ethics.¹ PJS directly intervenes, engages with
13 decisionmakers, and partners with local and international parties to address issues or
14 obstacles that hinder the ability of Palestinian journalists to conduct their crucial work. PJS
15 also engages in advocacy on behalf of its members, seeking to raise public consciousness and
16 shift public opinion about the extraordinarily difficult conditions under which Palestinian
17 journalists operate. PJS's direct interventions, partnerships with other entities, and demands
18 for policy changes are guided by treaties and international charters that safeguard journalists'
19 rights—most notably UN Security Council Resolution 2222—as well as the national
20 Palestinian policy agenda and local and international codes of ethics for media professionals.
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22

23 PJS submits this amicus brief to document the impact of the ongoing genocide in
24 Gaza on Palestinian journalists, an unprecedented number of whom have been targeted and
25 killed by the Israeli military since October 7, 2023. In the ten years before this genocide, PJS
26

27 ¹ See, e.g., *Global Charter of Ethics for Journalists*, International Federation of Journalists,
28 <https://www.ifj.org/who/rules-and-policy/global-charter-of-ethics-for-journalists>.

1 investigated and documented approximately 9,000 violations against Palestinian journalists in
2 the oPt, including Israeli-perpetrated firing of tear gas, confiscation of cameras, restrictions
3 on movement or filming, assaults, arrests, imprisonment, and dozens of killings. As the
4 Committee to Protect Journalists noted in May 2023, the “deadly pattern” of journalist
5 killings by the Israeli military over the past two decades—with no accountability—was
6 alarming enough.² But in the last three months, an average of more than one journalist per
7 day has been killed in Gaza, and PJS has had to dedicate most of its time to investigating and
8 documenting these assassinations. Palestinian journalists no longer even report violations of a
9 relatively minor nature, such as assaults or restrictions on movement, because of the lethal
10 threats they are facing in Gaza.
11

12
13 In addition, PJS has been unable to properly fulfill its role in Gaza since the start of
14 the genocide. PJS has been able to maintain contact with fewer than twenty percent of the
15 journalists who remain alive in Gaza. Moreover, because of frequent communications
16 blackouts, appalling living conditions, and constant and imminent lethal threats from Israeli
17 bombardment, this contact is sporadic. PJS has also been unable to deliver essential
18 protective gear—including bulletproof helmets and vests—to journalists in Gaza.
19

20 **I. ISRAEL’S TARGETED AND LETHAL ATTACKS ON JOURNALISTS IN 21 GAZA**

22 Israel’s genocide in the Gaza Strip has exacted a horrific death toll, triggering mass
23 popular protests and rallies across the world. As of December 29, 2023, Israel has killed
24 21,507 Palestinians in Gaza—nearly one percent of Gaza’s total population. The proportion
25 of journalists and media workers killed is even more staggering. Of the 1,200 Palestinian
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27 ² Committee to Protect Journalists, Deadly Pattern (May 2023), [https://cpj.org/wp-](https://cpj.org/wp-content/uploads/2023/05/CPJ-Special-Report-May-2023_Deadly-Pattern.pdf)
28 [content/uploads/2023/05/CPJ-Special-Report-May-2023_Deadly-Pattern.pdf](https://cpj.org/wp-content/uploads/2023/05/CPJ-Special-Report-May-2023_Deadly-Pattern.pdf).

1 journalists and media workers based in Gaza at the start of the genocide, at least 95—or
2 nearly eight percent—have been killed as of December 19, 2023.³ During previous Israeli
3 military attacks in the oPt, the proportion of journalists killed has consistently been lower
4 than the proportion of the population killed. In the current genocide, however, the proportion
5 of journalists killed is orders of magnitude higher than the population-wide percentage.
6
7 Indeed, Israel is perpetrating a truly unprecedented attack on journalists: according to data
8 collected by the Committee to Protect Journalists, more journalists were killed in the first ten
9 weeks of Israel’s assault on Gaza than have ever been killed in a single country over the
10 course of a whole year.⁴ As Reporters Without Borders stated early in the genocide—when
11 the number of journalists killed was half the current death toll—“This is one of the deadliest
12 tolls in a century...the Palestinian territory has been subjected to a veritable eradication of
13 journalism.”⁵

14
15 Evidence strongly indicates that the vast majority of the journalists and media workers
16 killed since the start of the genocide were specifically targeted for assassination by the Israeli
17 military; according to information collected by PJS, their killings appear deliberate rather
18 than incidental or collateral. At least 84 of the 95 deceased journalists were killed in
19 “surgical” or sniper Israeli attacks that targeted either their homes (or, in one case, their
20 personal vehicle) or the area where they were reporting, filming, or otherwise covering news
21 stories. Many of these journalists received direct and specific threats to their lives—
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23
24 ³ At least seven more journalists have been killed by the Israeli military since December 19, 2023, but
25 information about them has been omitted from this brief as PJS continues to gather information about their
26 deaths.

26 ⁴ *Israel-Gaza war takes record toll on journalists*, Committee to Protect Journalists (Dec. 21, 2023),
27 <https://cpj.org/2023/12/israel-gaza-war-takes-record-toll-on-journalists/>.

27 ⁵ *Israel is eradicating journalism in Gaza, with ten reporters killed in three days, 48 since start of war*,
28 Reporters Without Borders, <https://rsf.org/en/israel-eradicating-journalism-gaza-ten-reporters-killed-three-days-48-start-war>.

1 sometimes multiple such threats—from the Israeli military before they were targeted. Dozens
2 of family members have also been killed in targeted strikes on journalists’ homes. The
3 Committee to Protect Journalists has stated that it is “particularly concerned about an
4 apparent pattern of targeting of journalists and their families by the Israeli military.”⁶
5

6 The Appendix to this brief contains a list of all Palestinian journalists and media
7 workers killed in Gaza from October 7 to December 19, 2023, along with information about
8 the circumstances surrounding each of their deaths. Some of the journalists, media workers,
9 and family members targeted and killed by the Israeli military include:

- 10 • *Hassouneh Sleem, Sari Mansour, and Saeed Al-Taweel, all of whom received direct*
11 *threats to their lives and were subsequently assassinated by Israel.*

12 **Hassouneh Sleem**, a photojournalist at Al Quds News Agency, and **Sari Mansour**,
13 Director General of Al Quds News Agency, both received online death threats
14 approximately 24 hours before they were killed in an Israeli attack on the Bureij
15 refugee camp in central Gaza on November 18, 2023.⁷ Sleem’s house was specifically
16 targeted in the assault. **Saeed Al-Taweel**, editor-in-chief of the Al Khamesa News
17 site, received death threats before an Israeli airstrike on October 9, 2023 targeted an
18 area of western Gaza where several media outlets were based, killing Al-Taweel
19 along with two other journalists, Mohammed Sobh and Hisham Alnwajha.⁸
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- 21 • *Rushdi Al Sarraj, Mohammad Abu Hatab, Montaser Al Sawaf, Mustafa Al Sawaf,*
22 *Bilal Jadallah, Samer Abu Daqqa, Dr. Ahmad Abu Absa, Dr. Adham Hassouneh,*
23 *Haneen Kashtan, Abdullah Alwan, Saleem Al-Naffar, Abdulhadi Habib, and*
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25 ⁶ *Israel-Gaza war takes record toll on journalists*, Committee to Protect Journalists (Dec. 21, 2023),
<https://cpj.org/2023/12/israel-gaza-war-takes-record-toll-on-journalists/>.

26 ⁷ *Israel is eradicating journalism in Gaza, with ten reporters killed in three days, 48 since start of war*,
Reporters Without Borders, [https://rsf.org/en/israel-eradicating-journalism-gaza-ten-reporters-killed-three-days-](https://rsf.org/en/israel-eradicating-journalism-gaza-ten-reporters-killed-three-days-48-start-war)
27 [48-start-war](https://rsf.org/en/israel-eradicating-journalism-gaza-ten-reporters-killed-three-days-48-start-war).

28 ⁸ *Saeed al-Taweel*, Committee to Protect Journalists (Oct. 9, 2023), <https://cpj.org/data/people/saeed-al-taweel/>.

1 *Mohamad Abu Hassira, who were all targeted and killed in “surgical” Israel*
 2 *airstrikes without prior evacuation orders.*

3 **Roshdi Al Sarraj**, founder of Ain Media, was killed in an Israeli airstrike that targeted
 4 his house in Tal al-Hawa, Gaza on October 22, 2023.⁹ As soon as Palestine TV
 5 correspondent **Mohammed Abu Hatab** returned home to Khan Younes after shooting a
 6 live television segment on November 2, 2023, he and eleven of his family members were
 7 killed in an Israeli airstrike that targeted the house.¹⁰ **Montaser Al Sawaf**, a
 8 photojournalist with Anadolu Agency, was targeted by Israeli airstrikes twice: in the first
 9 assassination attempt on November 18, 2023, Montaser’s father **Mustafa Al Sawaf**—
 10 himself a well-known journalist who worked for various media outlets, including the
 11 BBC—was killed along with his wife and two of his children, and Montaser was
 12 critically wounded.¹¹ In the second targeted strike on December 1, 2023, Montaser was
 13 killed in his house in southern Gaza along with his brother and other family members.¹²
 14 **Bilal Jadallah**, a prominent journalist and chair of the board of Press House-Palestine (a
 15 nonprofit organization that supports independent media and advocates for journalists in
 16 Palestine), was killed in a targeted Israeli strike on his car as he sought to evacuate from
 17 Gaza City on November 19, 2023.¹³ **Samer Abu Daqqa**, a cameraman with Al Jazeera,
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21 ⁹ *Palestinian Roshdi Sarraj is the 23rd journalist killed by Israel-Gaza war*, Al Jazeera (Oct. 23, 2023),
 22 <https://www.aljazeera.com/news/2023/10/23/another-palestinian-journalist-slain-in-an-israeli-airstrike-in-gaza>.

23 ¹⁰ Gaya Gupta, *Palestinian TV Reporter and 11 Family Members Killed in Gaza*, N.Y. Times (Nov. 3, 2023),
 24 <https://www.nytimes.com/2023/11/03/world/middleeast/mohammed-abu-hatab-reporter-killed-gaza.html>.

25 ¹¹ *Mustafa Al-Sawaf*, International Federation of Journalists (Nov. 18, 2023), <https://www.ifj.org/media-centre/news/detail/article/mustafa-al-sawaf>.

26 ¹² *Israeli Strikes Kill World-Renowned Researcher Sofyan Taya, Journalist Montaser Al-Sawaf*, Democracy
 27 Now! (Dec. 5, 2023), https://www.democracynow.org/2023/12/5/headlines/israeli_strikes_kill_world_renowned_researcher_sofyan_taya_journalist_montaser_al_sawaf.

28 ¹³ *Israel is eradicating journalism in Gaza, with ten reporters killed in three days, 48 since start of war*,
 Reporters Without Borders, <https://rsf.org/en/israel-eradicating-journalism-gaza-ten-reporters-killed-three-days-48-start-war>.

1 bled to death for over five hours on December 15, 2023 while the Israeli military—after
2 targeting and injuring Abu Daqqa in a drone strike on a Gaza school—blocked
3 ambulances and rescue workers from reaching him.¹⁴ Al Jazeera, which tried to
4 coordinate with the Israeli military to rescue Abu Daqqa as he bled to death, plans to
5 appeal to the International Criminal Court regarding their cameraman’s assassination.
6 “The legal file will also encompass recurrent attacks on the Network’s crews working
7 and operating in the occupied Palestinian territor[y] and instances of incitement against
8 them,” Al Jazeera said in a statement, adding that “[t]he network holds Israel accountable
9 for systematically targeting and killing their journalists and their families.”¹⁵ **Dr. Ahmad**
10 **Abu Absa**, journalist and Dean of Media and Technology at Gaza’s University of
11 Palestine, was killed when an Israeli airstrike targeted his home in Sheikh Radwan, Gaza
12 on December 13, 2023. **Dr. Adham Hassouneh**, journalist and media professor at Gaza
13 University and Al Aqsa University, was killed along with several of his family members
14 when an Israeli airstrike targeted his home in Gaza City on December 1, 2023.¹⁶ **Haneen**
15 **Kashtan**, who contributed to various media outlets including Al-Kofiya and Baladna
16 Web TV, was killed along with several of her family members in an Israeli airstrike on
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22 ¹⁴ *Al Jazeera condemns Israeli forces killing of cameraman Samer Abudaqa*, Al Jazeera (Dec. 15, 2023),
23 [https://www.aljazeera.com/news/2023/12/15/al-jazeera-condemns-israeli-forces-killing-of-cameraman-samer-](https://www.aljazeera.com/news/2023/12/15/al-jazeera-condemns-israeli-forces-killing-of-cameraman-samer-abu-daqqa)
24 [https://www.aljazeera.com/news/2023/12/15/al-jazeera-condemns-israeli-forces-killing-of-cameraman-samer-](https://www.aljazeera.com/news/2023/12/15/al-jazeera-condemns-israeli-forces-killing-of-cameraman-samer-abu-daqqa)
25 [https://www.aljazeera.com/news/2023/12/15/al-jazeera-condemns-israeli-forces-killing-of-cameraman-samer-](https://www.aljazeera.com/news/2023/12/15/al-jazeera-condemns-israeli-forces-killing-of-cameraman-samer-abu-daqqa)
26 [https://www.aljazeera.com/news/2023/12/15/al-jazeera-condemns-israeli-forces-killing-of-cameraman-samer-](https://www.aljazeera.com/news/2023/12/15/al-jazeera-condemns-israeli-forces-killing-of-cameraman-samer-abu-daqqa)
27 [https://www.aljazeera.com/news/2023/12/15/al-jazeera-condemns-israeli-forces-killing-of-cameraman-samer-](https://www.aljazeera.com/news/2023/12/15/al-jazeera-condemns-israeli-forces-killing-of-cameraman-samer-abu-daqqa)
28 [https://www.aljazeera.com/news/2023/12/15/al-jazeera-condemns-israeli-forces-killing-of-cameraman-samer-](https://www.aljazeera.com/news/2023/12/15/al-jazeera-condemns-israeli-forces-killing-of-cameraman-samer-abu-daqqa)
abudaqa; Ayesha Rascoe, *Remembering Samer Abu Daqqa, Al Jazeera journalist killed in an Israeli attack*,
NPR (Dec. 17, 2023), [https://www.npr.org/2023/12/17/1219882797/remembering-samer-abu-daqqa-al-jazeera-](https://www.npr.org/2023/12/17/1219882797/remembering-samer-abu-daqqa-al-jazeera-journalist-killed-in-an-israeli-attack)
[journalist-killed-in-an-israeli-attack](https://www.npr.org/2023/12/17/1219882797/remembering-samer-abu-daqqa-al-jazeera-journalist-killed-in-an-israeli-attack).

¹⁵ *Al Jazeera to refer killing of cameraman in Gaza to war crimes court*, The Guardian (Dec. 16, 2023),
[https://www.theguardian.com/world/2023/dec/17/al-jazeera-to-refer-killing-of-cameraman-in-gaza-to-war-](https://www.theguardian.com/world/2023/dec/17/al-jazeera-to-refer-killing-of-cameraman-in-gaza-to-war-crimes-court)
[crimes-court](https://www.theguardian.com/world/2023/dec/17/al-jazeera-to-refer-killing-of-cameraman-in-gaza-to-war-crimes-court);

Al Jazeera cameraman killed in Israeli strike on Gaza school, broadcaster says, The Guardian (Dec. 15, 2023),
[https://www.theguardian.com/world/2023/dec/16/al-jazeera-cameraman-killed-in-israeli-strike-on-gaza-school-](https://www.theguardian.com/world/2023/dec/16/al-jazeera-cameraman-killed-in-israeli-strike-on-gaza-school-broadcaster-says)
[broadcaster-says](https://www.theguardian.com/world/2023/dec/16/al-jazeera-cameraman-killed-in-israeli-strike-on-gaza-school-broadcaster-says).

¹⁶ *Adham Hassouna*, Committee to Protect Journalists (Dec. 1, 2023), [https://cpj.org/data/people/adham-](https://cpj.org/data/people/adham-hassouna/)
[hassouna/](https://cpj.org/data/people/adham-hassouna/).

1 Nuseirat refugee camp in northern Gaza on December 17, 2023.¹⁷ **Abdullah Alwan**, an
 2 audio commentator for Al Jazeera, was killed in an Israeli airstrike that targeted his home
 3 in Jabalia on December 18, 2023.¹⁸ **Saleem Al-Naffar**—a renowned poet and writer as
 4 well as journalist—was killed along with his family on December 7, 2023 in an Israeli
 5 airstrike on the home in Gaza City where they were sheltering.¹⁹ **Abdulhadi Habib**, a
 6 journalist with Al-Manara News Agency and HQ News Agency, was killed along with
 7 his mother-in-law when an Israeli airstrike targeted his apartment in Gaza’s Zeitoun
 8 neighborhood on October 16, 2023.²⁰ **Mohamed Abu Hassira**, a journalist with Wafa
 9 news agency, was killed along with 42 of his family members when an Israeli airstrike
 10 targeted his home near the Port of Gaza on November 7, 2023.²¹

- 11 • *Family members of Anas Al-Sharif, Yasser Qudih, and Wael Dahdouh—all of*
 12 *whom received death threats before their homes were targeted and family members*
 13 *killed by the Israeli military—as well as Momen Al-Sharafi, who lost 22 relatives in*
 14 *an Israeli strike.*

15 On November 22, 2023, Al Jazeera reporter and videographer **Anas Al-Sharif** received
 16 multiple phone calls from Israeli military officers instructing him to stop reporting and
 17 leave northern Gaza. Al-Sharif also received voice notes on WhatsApp reporting his
 18 location, indicating that he was under surveillance. On December 11, 2023, an Israeli
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 22 ¹⁷ Haneen Kashtan, Committee to Protect Journalists (Dec. 17, 2023), <https://cpj.org/data/people/haneen-kashtan/>.

23 ¹⁸ Abdallah Alwan, Committee to Protect Journalists (Dec. 18, 2023), <https://cpj.org/data/people/abdallah-alwan/>.

24 ¹⁹ Dan Sheehan, *These are the poets and writers who have been killed in Gaza* (Dec. 21, 2023), <https://lithub.com/these-are-the-poets-and-writers-who-have-been-killed-in-gaza/>.

25 ²⁰ Abdulhadi Habib, Committee to Protect Journalists (Oct. 16, 2023), <https://cpj.org/data/people/abdulhadi-habib/>; *Ongoing Israeli Attacks Kill Dozens Of Palestinian Civilians In Gaza*, International Middle East Media
 26 Center (Oct. 17, 2023), <https://imemc.org/article/ongoing-israeli-attacks-kill-dozens-of-palestinian-civilians-in-gaza/>.

27 ²¹ Mohamed Abu Hassira, Committee to Protect Journalists (Nov. 7, 2023), <https://cpj.org/data/people/mohamed-abu-hassira/>.

1 airstrike targeted Al-Sharif’s family home in Gaza’s Jabalia refugee camp, killing his 90-
2 year-old father.²² On November 8, 2023, a pro-Israel pressure group published a report
3 insinuating that photojournalist **Yasser Qudih** and three other photographers based in
4 Gaza had prior knowledge of the October 7 attacks.²³ Along with other major media
5 outlets, Reuters—which had published one of Qudih’s photos—“categorically denie[d]”
6 the claims in the report.²⁴ Although the pressure group then withdrew its false
7 accusations, the report had already incited the targeting of Qudih and other journalists: in
8 posts on X, Israeli Prime Minister Benjamin Netanyahu’s office wrote that “[t]hese
9 journalists were accomplices in “crimes against humanity” and former Israeli envoy to
10 the United Nations Danny Danon vowed to “hunt them down together with the
11 terrorists.”²⁵ A few days later, on November 13, four Israeli missiles targeted Qudih’s
12 home in southern Gaza and killed eight of his family members.²⁶ The Committee to
13 Protect Journalists expressed “deep alarm by the pattern of journalists in Gaza reporting
14 receiving threats, and subsequently, their family members being killed.”²⁷ On October 25,
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19 ²² *Father of Al-Jazeera’s Anas Al-Sharif killed in Gaza after journalist receives threats*, Committee to Protect
20 Journalists (Dec. 11, 2023), <https://cpj.org/2023/12/father-of-al-jazeeras-anas-al-sharif-killed-in-gaza-after-journalist-receives-threats/>.

21 ²³ Mohamed Mandour, *Attacks, arrests, threats, censorship: The high risks of reporting the Israel-Gaza war*,
22 Committee to Protect Journalists (Dec. 20, 2023), <https://cpj.org/2023/12/attacks-arrests-threats-censorship-the-high-risks-of-reporting-the-israel-amas-war/>.

23 ²⁴ *Reuters denies any suggestion it had prior knowledge of Oct. 7 Hamas attack on Israel*, Reuters (Nov. 9,
24 2023), <https://www.reuters.com/world/middle-east/reuters-denies-it-had-prior-knowledge-oct-7-hamas-attack-israel-2023-11-09/>.

25 ²⁵ Crispian Balmer, *HonestReporting accepts news groups had no prior warning of Oct. 7 Hamas attack*,
26 Reuters (Nov. 11, 2023), <https://www.reuters.com/world/middle-east/israeli-advocacy-group-accepts-news-outlets-had-no-prior-warning-hamas-attack-2023-11-10/>.

27 ²⁶ Mohamed Mandour, *Attacks, arrests, threats, censorship: The high risks of reporting the Israel-Gaza war*,
28 Committee to Protect Journalists (Dec. 20, 2023), <https://cpj.org/2023/12/attacks-arrests-threats-censorship-the-high-risks-of-reporting-the-israel-amas-war/>.

²⁷ *Father of Al-Jazeera’s Anas Al-Sharif killed in Gaza after journalist receives threats*, Committee to Protect
Journalists (Dec. 11, 2023), <https://cpj.org/2023/12/father-of-al-jazeeras-anas-al-sharif-killed-in-gaza-after-journalist-receives-threats/>.

1 2023, Al Jazeera’s Gaza bureau chief **Wael Al-Dahdouh** lost his wife, daughter, son, and
2 grandson in an Israeli airstrike on the home where they were sheltering in Nuseirat
3 refugee camp.²⁸ Al-Dahdouh had remained in Gaza City to continue his coverage of
4 Israeli atrocities, despite threats made against him.²⁹ On December 6, 2023, Al Jazeera
5 correspondent **Momen Al-Sharafi** lost 22 family members—including his parents,
6 siblings and their spouses, and nieces and nephews—in an Israeli airstrike on the home in
7 Jabalia refugee camp where they had sought refuge.³⁰

9 II. CRITICAL ROLE OF PALESTINIAN JOURNALISTS IN EXPOSING 10 ISRAEL’S GENOCIDE

11 Since the start of the genocide, Israel has not permitted the entry of foreign journalists
12 into Gaza. On December 19, 2023, the Foreign Press Association (“FPA”) in Jerusalem,
13 which represents about 370 journalists from 130 media outlets in more than 30 countries,
14 filed a petition with the Israeli Supreme Court requesting immediate access to Gaza for
15 international media.³¹ The FPA had previously submitted numerous unanswered requests to
16 the Israeli government for access.³² Because foreign journalists have not been able to enter
17 Gaza, Palestinian journalists (and other members of Palestinian civil society who document
18 and report on events and conditions on the ground) are the world’s only portal into Gaza.
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21 ²⁸ *‘Our voices will go on’: Dahdouh’s Al Jazeera team stands behind him*, Al Jazeera (Oct. 25, 2023),
22 [https://www.aljazeera.com/news/2023/10/25/our-voices-will-go-on-dahdouhs-al-jazeera-team-stands-behind-](https://www.aljazeera.com/news/2023/10/25/our-voices-will-go-on-dahdouhs-al-jazeera-team-stands-behind-him)
23 [him](https://www.aljazeera.com/news/2023/10/25/our-voices-will-go-on-dahdouhs-al-jazeera-team-stands-behind-him).

23 ²⁹ *Id.*

24 ³⁰ *Israeli raid kills 22 members of Al Jazeera correspondent’s family in Gaza*, Al Jazeera (Dec. 6, 2023),
[https://www.aljazeera.com/news/2023/12/6/israeli-raid-kills-21-members-of-al-jazeera-correspondents-family-](https://www.aljazeera.com/news/2023/12/6/israeli-raid-kills-21-members-of-al-jazeera-correspondents-family-in-gaza)
25 [in-gaza](https://www.aljazeera.com/news/2023/12/6/israeli-raid-kills-21-members-of-al-jazeera-correspondents-family-in-gaza).

26 ³¹ Statement by Foreign Press Association regarding entry into Gaza for journalists, The Foreign Press
Association (Dec. 19, 2023), [https://foreignpressassociation.online/2023/12/19/fpa-statement-regarding-entry-](https://foreignpressassociation.online/2023/12/19/fpa-statement-regarding-entry-to-gaza-for-journalists-december-19-2023/)
27 [to-gaza-for-journalists-december-19-2023/](https://foreignpressassociation.online/2023/12/19/fpa-statement-regarding-entry-to-gaza-for-journalists-december-19-2023/).

28 ³² *Foreign correspondents petition Israel Supreme Court for Gaza access*, Reuters (Dec. 19, 2023),
[https://www.reuters.com/world/middle-east/foreign-correspondents-petition-israel-supreme-court-gaza-access-](https://www.reuters.com/world/middle-east/foreign-correspondents-petition-israel-supreme-court-gaza-access-2023-12-19/)
[2023-12-19/](https://www.reuters.com/world/middle-east/foreign-correspondents-petition-israel-supreme-court-gaza-access-2023-12-19/).

1 Indeed, Israel is targeting and killing Palestinian journalists in Gaza precisely because of the
2 critical role they play in exposing Israel’s criminal conduct for the world to see.

3
4 **CONCLUSION**

5 The systematic targeting and killing of Palestinian journalists and their families in Gaza
6 is but one chilling aspect of Israel’s ongoing genocide. President Biden, Secretary of State
7 Blinken, and Secretary of Defense Austin—who have a legal obligation to prevent
8 genocide—must be enjoined from providing any further weapons, funds, or diplomatic
9 support to the state of Israel.

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APPENDIX: List of journalists and media workers killed in Gaza: October 7 - December 19, 2023

	Name	Age	Gender	Type of profession	Place of work	Date of killing	Place of killing	Circumstances surrounding killing
1	Adel Zorob	43	M	Freelance journalist	Worked with multiple media outlets	19/12/2023	Rafah	Killed in an Israeli airstrike on his home in Rafah, southern Gaza, along with 25 family members
2	Abdallah Alwan	29	M	Media worker, voiceover specialist	Multiple media outlets including the Al-Jazeera	18/12/2023	Jabalia	Killed in an Israeli airstrike on his home in Jabalia
3	Assem Kamal Moussa			produced visual and written news reports	Palestine Now	17/12/2023	Khan Younes	Killed in an Israeli airstrike on Khan Younes, southern Gaza
4	Haneen Kashtan	31	F	TV Al-Kofiya, Baladna Web TV	Multiple media outlets	17/12/2023	Nuseirat refugee camp	Killed in an Israeli airstrike on Nuseirat refugee camp in northern Gaza, along with other family members
5	Samer Abu Daqqa	45	M	Journalists	Video journalist of Al Jazeera Channel	15/12/2023	Khan Younes	Injured by an airstrike that targeted his work location with his colleague Wael Dahdouh, and he kept bleeding for more than 5 hours until death
6	Ahamd Abu Absa	40	M	Journalist	Journalist and Dean of media & technology college in Palestine University	13/12/2023	Sheikh Radwan	Killed by an airstrike that targeted his house in Sheikh Radwan, Gaza
7	Hanan Ayyad	30	F	Journalist	Freelancer	13/12/2023	Gaza	Killed with her husband and children by an airstrike that targeted her house in Gaza
8	Abdul Kareem Odeh		M	Journalist	Freelance (Al Maydeen previously)	12/12/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
9	Salim Naffar	60	M	Journalist	Palestinian journalist and writer	7/12/2023	Gaza	Killed with his wife, children, and sister's family by an airstrike that targeted her house in Al Nasser, Gaza
10	Narmeen Qawwas	28	F	Journalist	Intern at RT tv and worked previously in media institute for communication	11/12/2023	Gaza	Killed with her husband and children by an airstrike that targeted her house in Gaza
11	Mohammad Abu Samra	27	M	Journalist	Sport photojournalist	10/12/2023	Gaza	Killed by Israeli sniper's bullets in north Gaza
12	Dua Jbour	20	F	Journalist	Freelancer	9/12/2023	Khan Younes	Killed with her husband, children, and 14 members of her family by an airstrike that targeted her house in Khan Younes
13	Ola Attallah		F	Journalist	Freelancer (Anadolu correspondent previously)	9/12/2023	Gaza	Killed with 9 members of her family by an airstrike that targeted her house in Gaza
14	Hussam Ammar		M	Journalist	Amwaj sport radio	8/12/2023	Khan Younes	Killed with his family by an airstrike that targeted her house in Khan Younes
15	Abdul Hamid Qarnawi	21	M	Journalist	Sports photojournalist	04/12/2023	Deir Al Balah	Killed by an airstrike that targeted Deir Al Balah
16	Hamada Yazeji	29	M	Journalist	Editor at Kanaan news network	4/12/2023	Gaza	Killed with his family by an airstrike that targeted her house in Sheikh Radwan, north Gaza
17	Shaima Jazzar		F	Journalist	Freelancer economic journalist (contracted Majedat Rafah network and Al Hayat newspaper)	03/12/2023	Rafah	Killed with 9 members of her family by an airstrike that targeted her house in Rafah
18	Dr Hassan Farajallah		M	Journalist	Al Quds today channel, journalist and media professor at Gaza and Al Aqsa universities	3/12/2023	Gaza	Killed by an airstrike that targeted Gaza City
19	Mohammad Farajallah		M	Journalist	Freelancer Photojournalist	2/12/2023	Gaza	Killed by an airstrike that targeted their house in Gaza
20	Marwan Sawwaf		M	Journalist	Photojournalist at Alef Media	2/12/2023	Gaza	Killed with his brother Muntaser by an airstrike that targeted their house in Gaza
21	Dr Adham Hassouneh	41	M	Journalists	journalist and media professor at Gaza and Al Aqsa universities	1/12/2023	Gaza	Killed with his family by an airstrike that targeted her house in Gaza
22	Montaser Sawwaf	33	M	Journalist	Photojournalist at Anadolu	1/12/2023	Gaza	An airstrike that targeted south Gaza injured him, but later he died; also his brother and some of his relatives were killed by the airstrike
23	Abdullah Darwish		M	Journalists	Video journalist at Al Aqsa TV	1/12/2023	North Gaza	Killed with his family by an airstrike that targeted his house in Gaza

24	Nader Al Nazli		M	Media worker	Technician at Palestine TV	25/11/2023	Gaza	He was found dead under rubble with his family one week after the bombing of his house
25	Amal Zuhud	27	F	Journalist	Freelancer	23/11/2023	Gaza	Killed with her husband and children by an airstrike that targeted her house in Gaza
26	Mustafa Bakeer		M	Journalist	Al Aqsa TV	23/11/2023	Gaza	He was found dead under rubble with his family after the bombing of his house
27	Mohammad Mo'een Ayyash	29	M	Journalist	Gaza now photojournalist	22/11/2023	Nuseirat refugee camp	Killed by an airstrike that targeted Nuseirat refugee camp, along with 20 members of his family
28	Assem Adli Al Bursh	34	M	Media worker	Sound engineer at Al Rai radio	22/11/2023	Al Saftawi area, north Gaza strip	Killed by snipers' bullets north Gaza
29	Mohammad Nabil Al Ziq	29	M	Media worker	Administrative staff at Al Quds Today TV	22/11/2023	Shuja'ia area	Killed by an airstrike that targeted Shuja'ia area
30	Alaa Al Nimer		M	Journalist	Media officer at Engineers union (media graduate)	20/11/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
31	Jamal Hanieh	21	M	Media worker	Amwaj institution	21/11/2023	North Gaza	Killed by an airstrike that targeted north Gaza
32	Ayat Omar Khdourah	27	F	Journalist	Editor, podcast producer and public relations officer	20/11/2023	Beit Lahia	Killed by an airstrike that targeted her house in Beit Lahia
33	Bilal Jadallah Salem	45	M	Journalist	Director General of Press house	19/11/2023	Gaza	Direct bombing of his car
34	Hassouneh Sleem	28	M	Journalist	Photo journalists at Quds news	18/11/2023	Al Breij refugee camp	Killed by an airstrike that targeted his house in Al Breij refugee camp
35	Sari Mansour	32	M	Journalist	Director General of Al Quds news agency	18/11/2023	Al Breij refugee camp	Killed by an airstrike that targeted his house in Al Breij refugee camp
36	Abdul Halim Awad	41	M	Media worker	broadcasting vehicle driver of Al Aqsa TV	18/11/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
37	Mustafa Sawwaf	69	M	Journalist	Correspondent in different media outlets such as BBC	18/11/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
38	Amro Salah Abu Hayeh		M	Media worker	Broadcasting engineer at Al Aqsa TV	18/11/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
39	Mussab Ashur		M	Journalist	Website administrator of Applied Science college	18/11/2023	Nuseirat	Killed by an airstrike that targeted his house in Nuseirat
40	Mahmoud Matar		M	Journalist	Freelancer	15/11/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
41	Yacoub Bursh	30	M	Journalist	Photojournalist at Nama radio	14/11/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
42	Moussa Bursh	30	M	Media worker	Director General of Nama Radio	13/11/2023	Jabalia refugee camp	Killed by an airstrike that targeted his house in Jabalia
43	Ahmad Amin Fatimeh	29	M	Journalist	Correspondent of Cairo news channel	13/11/2023	Gaza	Killed by Israeli bullets at the surrounding of Al Shifaa hospital
44	Ahmad Qarra	27	M	Journalist	Al Aqsa university photojournalist	10/11/2023	Khuza'a, East Khan Younes	Killed by an airstrike that targeted his house in Khuza'a
45	Yahya Abu Manee		M	Journalist	Al Aqsa Radio	7/11/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
46	Mohammad Ghanem Al Jajeh	31	M	Journalist	Press house	6/11/2023	Al Nasser/ Gaza	Killed by an airstrike that targeted his house in Al Nasser, Gaza
47	Mohamad Abu Hassira	53	M	Media worker	Administrative staff at Wafa news agency	7/11/2023	Gaza	Killed by an airstrike that targeted his house, next to Gaza port
48	Haitham Harara		M	Journalist	Government press office	3/11/2023	Gaza	Killed by an airstrike that targeted Al Shifaa hospital entrance
49	Iyad Matar		M	Media worker	Administrative staff at Al Aqsa TV	2/11/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
50	Mohammad Bayyari		M	Journalist	Al Aqsa TV	2/11/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
51	Mohammad Abu Hatab	52	M	Journalist	Palestine TV correspondent	2/11/2023	Khan Younes	Killed by an airstrike that targeted his house in Khan Younes
52	Majd Fadel Arandas	29	M	Journalist	Freelancer	1/11/2023	Nuseirat, Gaza	Killed by an airstrike that targeted his house in Nuseirat, Gaza
53	Majed Ahmad Kashko	47	M	Media worker	Administrative staff at Palestine TV	30/10/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
54	Imad Abdul Mohdi Al Whaidi	57	M	Media worker	Administrative staff at Palestine TV	30/10/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
55	Nazmi Nadeem	54	M	Media worker	Administrative staff at Palestine TV	30/10/2023	Al Zaitoun, Gaza	Killed by an airstrike that targeted his house in, Al Zaitoun Gaza

56	Huthaifa Najjar		M	Journalist	Freelancer	28/10/2023	Khan Younes	Killed by an airstrike that targeted his house in Khan Younes
57	Yasser Subhi Abu Namous		M	Journalist	Al Sahel Media center	26/10/2023	Khan Younes	Killed by an airstrike that targeted his house in Khan Younes
58	Mohammad Fayez Al Hassani		M	Media worker	Director General of Rawasi institution	26/10/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
59	Dua' Sharaf		F	Journalist	Al Aqsa radio	26/10/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
60	Zaher Al Afghani	27	M	Journalist		25/10/2023	Deir Al Balah	Killed by an airstrike that targeted his house in Deir Al Balah
61	Jamal Faqawi	28	M	Journalist	Mithaq media network	25/10/2023	Khan Younes	Killed by an airstrike that targeted his house in Khan Younes
62	Salma Mkhaimar	34	F	Journalist	Freelancer	25/10/2023	Rafah	Killed by an airstrike that targeted his house in Rafah
63	Ahmad Abdul Hai Abu Mhadi	35	M	Journalist	Al Aqsa TV	25/10/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
64	Saed Samir Al Halabi	42	M	Journalist	Al Aqsa TV	25/10/2023	Jabalia refugee camp	Killed by an airstrike that targeted his house in Jabalia
65	Mahmoud Jamal Abu Tharifeh	29	M	Journalist	Saudi cultural center	24/10/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
66	Iman Oqeili	29	F	Media worker		24/10/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
67	Mohammad Imad Labad	27	M	Journalist	Al Rissala media institution	23/10/2023	Gaza, Sheikh Radwan	Killed by an airstrike that targeted his house in Gaza
68	Rushdi Sarraj	31	M	Journalist	Ein Media company	22/10/2023	Gaza, Tal Al Hawa	Killed by an airstrike that targeted his house in Gaza
69	Ahmad Nahed Masoud	32	M	Media worker		22/10/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
70	Hani Madhoun	59	M	Media worker	Administrative staff at Al Aqsa TV	21/10/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
71	Mohammad Ali (Abu Ahd)	31	M	Journalist	Shabab Radio	20/10/2023	North Gaza	Killed by an airstrike that targeted his house north Gaza
72	Ayed Ismail Najjar		M	Journalist	Freelancer	20/10/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
73	Khalil Ibrahim Abu Athra	40	M	Journalist	Al Aqsa TV video journalist	19/10/2023	Nasser, north Rafah	Killed by an airstrike that targeted his house in Rafah
74	Samih Abdul Razeq Al Nadi	56	M	Journalist	Director at Al Aqsa TV	18/10/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
75	Rajab Naqib	31	M	Journalist	Freelancer	17/10/2023	Gaza	Killed by an airstrike that targeted his house in Gaza
76	Mohammad Jamil Balousheh	36	M	Media worker	Administrative officer Palestine Today TV	17/10/2023	Al Saftawi, Gaza	Killed by an airstrike that targeted his house in Gaza
77	Issam Mohammad Bhar	39	M	Journalist	Al Aqsa TV	16/10/2023	Al Sabra, Gaza	Killed by an airstrike that targeted his house in Gaza
78	Abdul Hadi Habib	37	M	Journalist	UNRWA educational TV	16/10/2023	Al Zaitoun, Gaza	Killed by an airstrike that targeted his house in Gaza
79	Yousef Dawwas		M	Media worker	Writer at Waqa'e newspaper	14/10/2023	Beit Lahia	Killed by an airstrike that targeted his house in Beit Lahia
80	Salam Khalil Mema	40	F	Journalist	Freelancer	13/10/2023	Jabalia	Killed by an airstrike that targeted his house in Jabalia
81	Hussam Mahmoud Mubarak	41	M	Journalist	Al Aqsa TV	13/10/2023	North Gaza	Killed by an airstrike that targeted his house north Gaza
82	Ahmad Abdulrahman Shihab	42	M	Journalist	Prisoners voice radio	12/10/2023	Jabalia refugee camp	Killed by an airstrike that targeted his house in Jabalia
83	Abdul Rahman Rabee Shihab	55	M	Media worker	Director General of Atlas center for studies	11/10/2023	Jabalia	Killed by an airstrike that targeted his house in Gaza
84	Mohammad Fayez Abu Matar	28	M	Journalist	Freelancer photojournalist	11/10/2023	Rafah	Killed by an airstrike that targeted his house in Rafah
85	Mustafa Al Naqib	28	M	Journalist	Freelancer journalist and researcher	11/10/2023	Gaza	Killed by an airstrike that targeted Gaza
86	Salam Meimah	27	F	Journalist	Al Quds Radio	11/10/2023	Jabalia refugee camp	Killed with her husband and three children when Israeli warplanes bombed their house in Jabalia refugee camp, in northern Gaza
87	Hisham Nawajha	27	M	Journalist	Khabar news agency photojournalist	10/10/2023	West Gaza (Hajji Tower)	Killed by an airstrike that targeted west Gaza during performing his duty
88	Said Radwan Taweel	37	M	Journalist	Director of Al Khamesa	10/10/2023	West Gaza (Hajji Tower)	Killed by an airstrike that targeted west Gaza during performing his duty
89	Mohammad Rizeq Soboh	36	M	Journalist	Khabar news agency photojournalist	10/10/2023	West Gaza (Hajji Tower)	Killed by an airstrike that targeted west Gaza during performing his duty

90	Anas Abu Shammaleh	27	M	Journalist	Freelancer	9/10/2023	Deir Al Balah	Killed by an airstrike that targeted Deir Al Balah
91	Assad Abdul Nsser Shamallakh	20	M	Journalist	Freelancer	8/10/2023	Sheikh Ejlin, Gaza	Killed by an airstrike that targeted his house in Gaza
92	Asaad Shamlikh		M	Journalist	Freelance	8/10/2023	Sheikh Ijlin, the southern Gaza Strip	Killed along with 9 members of his family in an Israeli airstrike on their home in Sheikh Ijlin, a neighbourhood in the southern Gaza Strip
93	Mohamad Tohami Al Salhi	29	M	Journalist	Forth Authority news agency	7/10/2023	Est Breij	Killed by Israeli bullets east Breij during covering the events at eastern borders
94	Ibrahim Lafi	21	M	Journalist	Photojournalist at Ein Media	7/10/2023	Beit Hanoun crossing	Killed by Israeli bullets during covering the events at Beit Hanon crossing
95	Mohammad Sami Jarghoun	28	M	Journalist	Smart Media correspondent	7/10/2023	East Rafah	Killed by Israeli bullets during covering the events east Rafah