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To: The Independent International
Commission of Inquiry on the Occupied
Palestinian Territory, including East
Jerusalem, and Israel

Dear Honorable Commission,

We, the Jerusalem Institute of Justice, are a not-for-profit human rights organization, with Special Consultative Status at the UN Economic and Social Council, fighting to promote human rights, defend democracy, and improve the overall quality of life for Israelis and Palestinians alike. Due to our hope of ever-lasting peace in the region, we find it of the utmost importance to address your call for submissions of relevant information and documentation to the mandate of the Commission.

The attached report concerning the Crimes against Humanity committed against Palestinian citizens by the Palestinian Authority (PA) was filed by our organization at the Office of the Prosecutor at the International Criminal Court (ICC) in The Hague on the 20th of February 2019, together with the report on Mahmoud Abbas's Crimes against Humanity. The report includes testimonies of 52 Palestinian civilians who have suffered the grave atrocities of arbitrary imprisonment, torture, and murder by the PA during the time period of 1991 to 2004. We argued that a full investigation of crimes against humanity should be pursued, and a case should be lodged, against Mahmoud Abbas, as President of the PA, for his role in the murder, torture, and unlawful imprisonment of innocent Palestinian civilians. Following this communication, and others, an investigation of the "Situation in Palestine" was commenced by the Chief Prosecutor of the ICC on the 3rd of March 2021. The submission of this report is in accordance with the COI's mandate to collect evidence and information of abuses of international human rights law and identify those responsible.

On November 11, 2018, the Israeli Supreme Court rejected an appeal and upheld the district court ruling that found the PA liable for unlawful imprisonment in a precedent-setting ruling and ordered the PA to compensate the 52 plaintiffs. The victims, suspected by the PA of "collaboration with Israel," suffered extreme physical and emotional trauma that has caused numerous long-term damages. The Supreme Court found all testimonies reliable. As President of the Palestinian Authority, Abbas has played a pivotal role in exercising effective authority and control over the imprisonment, torture, and murder of these Palestinian civilians, in furtherance of a state policy designed to deter resistance towards his Government. During his time in power, Abbas has directed or allowed these crimes to be committed against these Palestinians and many more. Abbas's acts of arbitrary imprisonment, torture, and murder against these Palestinians and many more constitute crimes against humanity under Article 7 of the Rome Statute of the International Criminal Court.

We *urge* the commission to look into these violations of Human Rights committed by the Palestinian Authority and include them in their report due to be presented in the Human Rights Council's June regular session.

Yours sincerely,

Flavia Sevald, CEO
Jerusalem Institute of Justice



In the
International Criminal Court

The Jerusalem Institute of Justice
Notice to the Prosecutor,
Crimes against Humanity committed
against Palestinian citizens

Notice to the Office of the Prosecutor of the
International Criminal Court regarding Crimes against
Humanity committed by the Palestinian Authority
against Palestinian citizens in the West Bank



**Notice to the Office of the Prosecutor of the International Criminal Court
regarding Crimes against Humanity committed by the Palestinian
Authority against Palestinian citizens in the West Bank**

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Introduction

We, the Jerusalem Institute of Justice (“JIJ”), submit to the Office of the Prosecutor (“OTP”) of the International Criminal Court (“ICC” or “Court”) testimonies and affidavits of 52 Palestinian civilians who have suffered the grave atrocities of arbitrary imprisonment, torture, and murder by the Palestinian Authority (“PA”) during the time period of 1991 to 2004.

On July 17, 2017, the Jerusalem District Court found the PA liable for unlawful imprisonment in a precedent-setting ruling and ordered the PA to compensate the 52 plaintiffs.¹ The victims, suspected by the PA of “collaboration with Israel,” suffered extreme physical and emotional trauma that has caused numerous long-term damages. The court found all testimonies reliable. The exact amount of compensation is yet to be determined.

On February 20, 2019, the JIJ submitted to the OTP a communication pursuant to Article 15 of the Rome Statute of the ICC concerning Mahmoud Abbas in relation to the alleged crimes against humanity of murder, torture, and unlawful imprisonment. Those crimes were committed through a systematic and widespread campaign against parts of the Palestinian population in the West Bank from February 2011 through February 2019.

The “State of Palestine” deposited a retroactive ad hoc submission to the ICC’s jurisdiction under Article 12(3) of the Rome Statute on January 1, 2015. According to the Article 12(3) declaration, the ICC has jurisdiction over crimes committed on the territory of the “State of Palestine” from June 13, 2014 onwards.² This date was intentionally selected to prevent the Court from holding the “State of Palestine” accountable for the murder of three Israeli teenagers on June 12, 2014 and for earlier cases of torture in the West Bank.

In addition to territorial jurisdiction, the ICC also has personal jurisdiction over crimes allegedly committed in the territory of the “State of Palestine.” Mahmoud Abbas has held Jordanian

¹ Dov Lieber, “Tortured by the PA for foiling terror, Palestinian finds remedy in Israeli court”, *The Times of Israel*, (September 20, 2017), available at: <https://www.timesofisrael.com/tortured-by-the-pa-for-foiling-terror-palestinian-finds-remedy-in-israeli-court/>

² International Criminal Court, *Preliminary Examination – Palestine*, available at: <https://www.icc-cpi.int/palestine>.



citizenship/nationality since 2011, and Jordan has been a State Party to the Rome Statute since 2002. Therefore, the ICC may exercise jurisdiction over crimes he has committed since becoming a Jordanian citizen/national, regardless of where they occurred.³

The JIJ is aware of the fact that the crimes against humanity testified to by the 52 Palestinians and submitted with this notice do not fall under the temporal jurisdiction of the ICC since they occurred before 2014. However, the JIJ is firmly convinced that the testimonies prove that a mechanism of systematic torture and unlawful imprisonment has been used by the PA for many years, well before 2014, and is still in place.

Abbas became president of the PA in 2005 and continues to preserve Yasser Arafat's regime of suppression of political enemies. Therefore, this notice supports the allegations against Mahmoud Abbas which were detailed in the communication submitted on February 20, 2019, and completes the picture of widespread and systematic crimes against humanity directed against the civilian population of the West Bank.

³ William A. Schabas, *The International Criminal Court: A Commentary on the Rome Statute* (Oxford, 2016), p. 351 *et seq.*

Chart of Testimonies

Red Text: Signifies that the victim died either during or after the torture

*The repeatedly mentioned Shabach Method of torture includes cuffing the victim's hands, typically in abnormal/uncomfortable positions, covering the head, and playing extremely loud music. In many testimonies, torturers also hung victims from the ceiling as part of the method.

^The Chinese Water Torture method includes physically restraining a prisoner and dripping water on the head, one drop at a time, for an extended period of time.

Name and Location of Arrest/Imprisonment	Torture Method	Interrogation Elements	Long-term Damages
I.R. <ul style="list-style-type: none"> Mashtal, Gaza Saraiya Prison, Gaza 	<ul style="list-style-type: none"> "Shabach Method"*: Hung from legs Bludgeoned Forced into a water barrel while head was covered with sack Tied to a pole and beaten until loss of consciousness Handcuffed for long periods of time Tortured with hot and cold water while a fan was pointed at him Burned using a cigarette Forced into a cell too small for sitting 	<ul style="list-style-type: none"> Interrogated undressed for 7 continuous days Deprived use of the shower for days at a time Deprived use of the toilet for multiple days Fed only two slices of bread and one egg each day Tortured with a monotonous, continuous sound for many days Denied legal advice/lawyer Captors demanded and took bribe 	<ul style="list-style-type: none"> Disc herniation Kidney problems Memory deficiency Mental problems Sense of suffocation Aggression Suicidality Night terrors Insomnia Inability to work His children suffer from neglect due to his dysfunctionality
A.B. <ul style="list-style-type: none"> Jenin Jnaid Prison, Nablus 	<ul style="list-style-type: none"> "Shabach Method": hung from wrists Bludgeoned Inflicted pain to testicles Beaten while sleeping 	<ul style="list-style-type: none"> Murder threats Face covered with a rug Denied legal advice/lawyer No indictment filed during captivity Forced to give a false confession 	<ul style="list-style-type: none"> Ulcer Abdominal pain Chest pains Headaches Pain in all limbs Repeating itches Blurry vision Night terrors



		<ul style="list-style-type: none"> • Captors demanded and took bribe 	<ul style="list-style-type: none"> • Phobias • Inability to read or write • Confusion • Memory deficiency • Attention span deficiency • Mental disorders • Anxiety • Inability to form meaningful relationships • Excessive smoking • Inability to work
<p>T.J.</p> <ul style="list-style-type: none"> • Jenin • Nablus Prison 	<ul style="list-style-type: none"> • "Shabach Method": hands tied behind back and hung from ceiling while hit by interrogators • Stabbed and slashed • Burned using cigarettes • Tortured using hot and cold water • Forced into a closet (60cm X 150cm) 	<ul style="list-style-type: none"> • Blindfolded during interrogation • Forced to do hard labor • Medical neglect • PA removed his newborn daughter from the incubator prematurely, resulting in disabilities • Murder threats, including using electric chair • PA performed a show trial against him, falsely accusing him of assisting Israel and seducing women to help this cause, and damaged his reputation irreversibly. 	<ul style="list-style-type: none"> • Leg pain • Headaches • Back pain • Mental disorders • Memory deficiency • Insomnia • Night terrors • Stress • Phobias • Depression • Solitude • Inability to participate in social gatherings • Inability to consume media by radio, television or newspaper • Feels responsible for his daughter's severe disability caused by premature removal from incubator
<p>A.I.</p> <ul style="list-style-type: none"> • Jenin • Nablus Prison 	<ul style="list-style-type: none"> • "Shabach Method": hung from wrists • Burned using cigarettes and molten plastic • Bludgeoned • Lashed using wires • Forced to shave 	<ul style="list-style-type: none"> • Forced cleaning labor • Forced to walk on all fours • Lost consciousness 3 times • Denied bathroom access • Medical neglect • Denied legal advice/lawyer 	<ul style="list-style-type: none"> • Inability to have sexual relations • Shoulder aches • Constant sense of suffocation • Phobias • Night terrors



	<ul style="list-style-type: none"> • Tied outside to a window until onset of cyanosis • The appointed MD hit him to check if he was alive 		<ul style="list-style-type: none"> • Insomnia • Suicidality • Tantrums • Inability to work • Inability to drive • Inability to integrate into society • Inability to share living situations resulting in isolation from friends and family • Inability to consume any kind of media
<p>A.A.</p> <ul style="list-style-type: none"> • Nablus 	<ul style="list-style-type: none"> • "Shabach Method" • Bludgeoned • Dental damage • Forced to spin until loss of consciousness 	<ul style="list-style-type: none"> • Head covered with a sack • Threats of capital punishment • Medical neglect • Insulted 	<ul style="list-style-type: none"> • Headaches • Shoulder aches • Back aches • Pharmaceutical treatment for blood pressure, heart disease, and breathing problems • Psychological issues • Sensitivity to loud noises • Depression • Phobias • Night terrors • Insomnia • Suicidality • Inability to concentrate • Lack of motivation • Inability to maintain a romantic relationship • Lack of appetite • Inability to work • Lack of faith and hope
<p>A.B.</p> <ul style="list-style-type: none"> • Hebron 	<ul style="list-style-type: none"> • "Shabach Method" • Forced into a small metal cage, bent painfully for extended periods of time. 	<ul style="list-style-type: none"> • Deprived sleep • His arrest was wiped from all records, and the Red 	<ul style="list-style-type: none"> • Limited range of motion due to pain • High blood pressure • Diabetes



<ul style="list-style-type: none"> • Ad Dahariya Prison 	<ul style="list-style-type: none"> • Burned using cigarettes • Threats of sodomy using a large glass bottle • Bludgeoned using pipes, sticks and firearms • Lashed using wires • Tortured using hot and cold water 	<p>Cross was the first to know after two months.</p> <ul style="list-style-type: none"> • Denied access to toilet • Restrained at all times • Head was covered during interrogation • Lost consciousness several times due to bludgeoning • Murder threats • Food deprivation • Medical neglect • Denied legal advice/lawyer • Forced to give a false confession • Captors demanded and took bribe 	<ul style="list-style-type: none"> • Loss of sex drive • Appetite loss • Night terrors • Insomnia • Excessive smoking • Tantrums • Inability to participate in social interactions • Inability to work • Inability to read and write • Severe mental trauma
<p>A.H.</p> <ul style="list-style-type: none"> • Mukataa Prison • Mukhbarat, Nablus 	<ul style="list-style-type: none"> • Hung from wrists • Electrocuted • Burned using cigarettes • His cellmate was killed • Deprived of food and water • Forced to perform sodomy on himself using a large soda bottle • Tied to a wall • Forced to masturbate in front of his interrogators • Head forced into a toilet bowl • Forced into a closet for 5 days straight (70cm X 70cm) • Dental damage and teeth lost • Hot margarine was poured into his ears 	<ul style="list-style-type: none"> • Medical neglect • Murder threats using a gun, an electric chair, and the "Tanzim" unit • Leg mutilated to prevent escape • Blindfolded whenever he was taken out of prison • Denied legal advice/lawyer • Forced to give a false confession 	<ul style="list-style-type: none"> • Headaches • Testicular pain • Leg pain • Rectal pain • Paranoia • Phobias • Night terrors • Suicidality • PTSD • Violent psychotic episodes • Loss of appetite • Memory loss • Intrusive thoughts • Extreme dissociative reaction (i.e. "policemen disguised as cats are following me, performing witchcraft") • Inability to work • Inability to concentrate • Excessive smoking • Parents' house raided



			<ul style="list-style-type: none"> Identifying document confiscated
<p>B.S.</p> <ul style="list-style-type: none"> Hebron 	<ul style="list-style-type: none"> Dental damage Repeated blows to the testicles Repeated blows to the left eye Solitary confinement Tied undressed in the prison yard during winter Forced into a barrel of cold water during winter 		<ul style="list-style-type: none"> Extensive dental damages Fractures Inability to have sexual relations Insomnia Mental disorder Tantrums Memory damage Job loss Lost his house in Hebron Loss of connection to family Excessive smoking
<p>J.N.</p> <ul style="list-style-type: none"> Hebron 	<ul style="list-style-type: none"> "Shabach Method": wrists and ankles tied to a wall for a long period of time without sleep or clothes Bludgeoned using sticks and pipes Lashed using wires Forced into a small cell for days at a time. Forced into a small closet for days without access to a toilet Dental damage His feet and legs were soaked in cold water making it impossible for him to run or escape 	<ul style="list-style-type: none"> Kidnapped his brother in order to pressure him to confess Captors demanded and took bribe (was released in return) Murder threats 	<ul style="list-style-type: none"> Frequent loss of consciousness Abdominal pain Back ache Anxiety attacks Memory deficiency Tantrums Confusion Inability to work Excessive smoking



<p>I.A.</p> <ul style="list-style-type: none"> • Mukataa, Nablus 	<ul style="list-style-type: none"> • "Shabach Method": forced into a painful position with legs in the air for 8 hours each day • Bludgeoned using sticks and firearms • Head was covered with a sack • Hands were tied behind his back • Forced to stand for hours on one leg • Forced to stand on cups • Deprived of water and food • Denied bathroom access • Forced to crouch on a cement block 	<ul style="list-style-type: none"> • The interrogation room had a distinct odor of sewer • Denied legal advice/lawyer • Medical neglect • Murder threats using a gun 	<ul style="list-style-type: none"> • Abdominal issues • Hemorrhoids • Difficulty breathing • Leg pain • Depression • Alienation from family • Insecurity • Inability to work • Loss of romantic partner and child during imprisonment
<p>I.H.</p> <ul style="list-style-type: none"> • Hebron 	<ul style="list-style-type: none"> • "Shabach Method": hung from ceiling and beaten • Forced into a small cell (80cm X 180cm) • Head was covered by sack. • Burned by lit cigarette • Electrocuted • Bludgeoned by sticks • Head was forced into a toilet • His car and his wife's car were set on fire • The whole village was invited to watch his execution 	<ul style="list-style-type: none"> • Denied legal advice/lawyer • Captors demanded and took bribe (was released in return) 	<ul style="list-style-type: none"> • Tremors • Inability to have sexual relations • Constant aggression • Phobias • Depression • Insomnia • Memory deficiency • Alienation from family and friends • Inability to participate in social events • Inability to work • Divorce • Debt acquisition • Requires financial support from his children • Labeled as a "Traitor" and his children suffer social fallout

<p>Z.A.</p> <ul style="list-style-type: none"> • Nablus Prison • Jnaid Prison • Mukhbarat • Salfut Building • Mukataa, Nablus 	<ul style="list-style-type: none"> • "Shabach Method": hung by wrists or ankles from ceiling and beaten for 14 hours a day • Slashed and stabbed in the back and the wounds were later salted • Dental damage: 4 teeth lost • Verbal abuse • Ribs broken • Denied access to toilet • Tortured using hot and cold water • Feet lashed using wires • Testicles kicked • Bludgeoned • Forced labor • Offered the choice between being murdered and performing a suicide bombing 	<ul style="list-style-type: none"> • Medical neglect • During the interrogation, one of the facility's high-ranking officers made it clear that his career depended on a successful conviction, and told Z.A. he'd be found guilty regardless of the actual facts • Due to fear for his life, he was willing to sign a deposition he had never read • Never appeared before a judge • Never had an Evaluation of Detention • Denied legal advice/lawyer • Witnessed a murder by an interrogator, which was covered up and made to look like a suicide • Murder threats • Forced to give a false confession • Captors demanded and took bribe (He believed it to be the only way out.) 	<ul style="list-style-type: none"> • Back damage and pain • Sterilization • Orthopedic damage in shoulders • Scars • Night terrors • Waking terrors • Flashbacks • Libido loss • Energy loss • Paranoia • Phobias • Suicidality • Confusion • PTSD • Dissociative reactions • Minimal cognitive functioning • Loss of ability to read and write • Difficulty concentrating • Memory deficiency • Shame from physical deformities due to torture • Inability to trust • Loss of ability to work • All identifying documents confiscated
<p>W.A.</p> <ul style="list-style-type: none"> • Mukataa building, Jenin • Nablus Prison 	<ul style="list-style-type: none"> • "Shabach Method" • Bludgeoned • Hung upside-down • Deprived sleep • Forced labor • Forced to stand with a bottle/can on his head, which the interrogator then shot • Shot in the legs 	<ul style="list-style-type: none"> • Sentenced to death when he was not there to defend himself • Medical neglect • Denied legal advice/lawyer • Forced to give a false confession 	<ul style="list-style-type: none"> • Mobility deficiencies due to spinal damage • Chronic swelling in left elbow • Abdomen pain • Inability to lift even the slightest weights • Left hand tremors • Dizziness • Asthma



	<ul style="list-style-type: none"> • Tortured with hot and then cold water • House and car were burned 		<ul style="list-style-type: none"> • Phobias • Night terrors • Insomnia • Headaches • Flashbacks • PTSD • Memory deficiency • Solitude • Depression • Aggression • Suicidality • Loss of appetite • Paranoia • Anxiety • Inability to work • Inability to consume media
<p>H.H.</p> <ul style="list-style-type: none"> • In his own home • Apartment in Jenin 	<ul style="list-style-type: none"> • Bludgeoned using sticks and firearms • Dental damage • Tied to a faucet • Tied to a bed • Forced into a closet for 5 hours • Hung from the ceiling, naked, losing blood and eventually lost consciousness • Deprived food and water • "Shabach Method": hung from wrists for hours • Tied to the roof naked in winter • No toilet access • Confined indoors for 6 months • Burned using cigarettes • Ear bludgeoned with firearm 	<ul style="list-style-type: none"> • Medical neglect • Denied legal advice/lawyer • Murder threats • Captors demanded and took bribe 	<ul style="list-style-type: none"> • Loss of arm use • Loss of speech ability • Acid reflux • Tonsil problems • Back pain • Ear problems • Headaches • Difficulty standing • Chronic fatigue • Night terrors causing violent action • Suicidality • Restlessness • Bedwetting • Self-harm • Extremely faulty orientation • Amnesia • Aggression • Insomnia • Paranoia • Agoraphobia • Tantrums



	<ul style="list-style-type: none"> • Back bludgeoned with a garden hoe 		<ul style="list-style-type: none"> • Memory deficiency • Incoherent thoughts • Minimal functioning • Flashbacks • PTSD • Traumatic state • Loss of ability to work • Loss of appetite • Excessive smoking • Detachment from society and inability to participate in social gatherings • Conflicts with law enforcement • Loss of valuable possessions • All PA identifying documents confiscated
<p>K.H.</p> <ul style="list-style-type: none"> • Jericho Prison • Qalqilya 	<ul style="list-style-type: none"> • "Shabach Method" • Beaten with a stick on the soles of the feet until he couldn't stand • Beaten all over his body until he bled and fainted • The torturers poured boiling plastic on his leg • Kicked in the face • Put into a cupboard so he couldn't sit down for 4 days (100cm x 150 cm) • Forced to sit on cans 	<ul style="list-style-type: none"> • Imprisoned the first time for 3 months • Imprisoned the second time for 20 days 	<ul style="list-style-type: none"> • Vision problems • Scars and pain in right leg • Back pain • Hallucinations • Often no sexual desire • PTSD • Nightmares • Insomnia • Fears of the dark • Stress • Lack of focus • Anxiety • Restlessness • Lack of interest in life • Depression • Anger • Constant sense of persecution • Inability to see family, lives in solitude • Inability to work



<p>Y.O.</p> <ul style="list-style-type: none"> • Jericho Prison • Nablus Prison • Jnaid Prison 	<ul style="list-style-type: none"> • Necessary head surgery performed by PA's doctor without anesthesia • After the surgeries, cuts not sewn up • Dental clinic uprooted 4 teeth instead of providing proper medical care for dental problems • Forced to stand on fragments of bottles • Beaten all over body • Hung from his hands • Put into a small cupboard for days 	<ul style="list-style-type: none"> • Sat in a dungeon for 70 days • Deprived sleep • Provided insufficient food • Imprisoned for 50 months • Murder threats • Medical neglect 	<ul style="list-style-type: none"> • Required back operation as a result of the torture he experienced • Two head tumors • Pain and difficulties of function in his back, right leg and left hand • Drug dependency to relieve pain • Scars • Head pain • Memory damage (can't remember his own phone number) • Confusion • Nightmares and sleeplessness • Fears • Depression • Loss of reading and writing aptitude • No permanent job • Nervous outbursts • Identifying document confiscated • Lives in solitude because of the fear of hurting people • Hurts his wife and children • Ruined family life • Loss of self-confidence • His family was expelled from the PA's areas
<p>T.J.</p> <ul style="list-style-type: none"> • Nablus Prison 	<ul style="list-style-type: none"> • Dental damage: 4 teeth lost • Broken bottle inserted into anus • Hung from legs for 2 months 	<ul style="list-style-type: none"> • His family was forced to pay for the food he ate during imprisonment • Imprisoned for 5 years • Murder threats • Medical neglect 	<ul style="list-style-type: none"> • Severe damage to back and pelvis • Blood in the stool • Spinal damage • Brain damage • Scars



	<ul style="list-style-type: none"> • Bludgeoned all over body (by various objects) • Cigarette burns • Hard physical labor • Tortured using hot and cold water • Head wounded • Necessary back surgery performed without anesthesia while hands and feet shackled • Put into small cupboard for 6 months where he couldn't sit and bucket of excrement emptied once a week 		<ul style="list-style-type: none"> • Pain in chest, head, ears and legs • Dizziness • Vision problems • PTSD • Nervous and violent outbursts • Nightmares and insomnia • Restlessness • Memory damage • Restiveness • Appetite loss • Paranoia • Seclusion • Anger • Inability to work • Financial problems • Identifying document confiscated • During the imprisonment, all his cattle were stolen
<p>H.D.</p> <ul style="list-style-type: none"> • Nablus 	<ul style="list-style-type: none"> • Kept in a small cabin • Tortured using hot and cold water • Face bludgeoned with sticks resulting in major loss of blood and consciousness • Teeth broken • Death threats • Penis beaten • Head covered by bags • Hands tied to the wall 	<ul style="list-style-type: none"> • Forced labor • Captors demanded and took bribe (was released in return) • Medical neglect • Denied legal advice/lawyer • Forced to give a false confession 	<ul style="list-style-type: none"> • Pain in head, teeth and back • Loss of sexual desire • Insomnia • Memory damage • Mental disorders • Paranoia • Inability to work • Significant financial loss • Can't enjoy simple pleasures • Lives alone
<p>H.A.</p> <ul style="list-style-type: none"> • Nablus • Jenin 	<ul style="list-style-type: none"> • Condemned to death • Sat on a tea cup • Strangled by rope pulled tight around his neck • Teeth pulled without anesthesia 	<ul style="list-style-type: none"> • Captors demanded and took bribe (was released in return) 	<ul style="list-style-type: none"> • Couldn't speak for two years after the arrest • Many pains • Nervousness • Memory damage • Sleep disorders (insomnia)



	<ul style="list-style-type: none"> • Handcuffed to a chair while his feet were under the chair legs. He fell from the chair and injured his head • Cut by a knife • Ate dog and donkey meat • Kept in a small cabin full of sewage 		<ul style="list-style-type: none"> • Inability to read or write • Inability to work • Fears and anxieties • Confusion • Has become a danger to his family • His house was burned down
<p>M.D.</p> <ul style="list-style-type: none"> • Hebron • Dahariya prison 	<ul style="list-style-type: none"> • Burned by melted plastic • Pricked by a hot needle • Kept in a small cabin with no access to toilet • Burned by a cigarette • Penis severely injured • Handcuffed in painful positions 		<ul style="list-style-type: none"> • Pains in head, back, liver, legs, penis • Sterility • Loss of sexual desire • Appetite loss • Memory damage • Fears and anxieties • Mental disorders • Inability to work • Lack of will to live • Loneliness, disconnection from family
<p>M.H.</p> <ul style="list-style-type: none"> • Hebron • Ad Dahariya Prison 	<ul style="list-style-type: none"> • "Shabach Method": hands tied behind back and hung from wrists • Humiliation • Poured trash and dirty dish water on his head • Forced to shower outside with cold water • Solitary confinement • Deprived sleep/forced to sleep on a wet mattress • Left kidney bludgeoned • Stuffed into a dark prisoner transport vehicle for 6 months • Slapped • Medical neglect 	<ul style="list-style-type: none"> • Threats of murder by bullet to the head and burning to death • Interrogated for 8 months • Denied legal advice/lawyer • Never charged • Imprisoned without a warrant • Blindfolded while transported • Watched murder of his friend • Transferred to places the PA presumed the IDF would bomb 	<ul style="list-style-type: none"> • Ruptured eardrum • Neck pain • Nausea • Sensitivity to light and wind • Shoulder pain • Back pain • Headaches • Pain in left leg • Memory deficiency • Night terrors • PTSD • Depression • Confusion • Insomnia • Loss of appetite • Loss of libido • Aggression • Suicidality



			<ul style="list-style-type: none"> • Inability to read • Paranoia • Alienation from family • Inability to work • Loss of patience • Inability to consume media of any kind • Inability to participate in social events • Loss of 100,000 NIS due to uncompleted jobs due to imprisonment
<ul style="list-style-type: none"> • K.R. • Jericho Prison, Nablus • Qalqilya 	<ul style="list-style-type: none"> • "Shabach Method" • Bludgeoned with bats • Lashed using wires • Access to bathroom withheld • Only allowed to drink from toilet • Forced into a dark prisoner transport vehicle • Deprived sleep • Waterboarded • Forced barefoot into a shallow pool with a spikey bottom overnight • Burned using cigarettes and melted plastic • Urinated on • Medical neglect • Forced labor 	<ul style="list-style-type: none"> • Murder threats • Prisoners were murdered publicly in order to control the rest of the prisoners • Gave false confession to avoid imminent sodomy by large soft drink bottle • Was never charged • Denied legal advice/lawyer • Captors demanded and took bribe (was released in return) 	<ul style="list-style-type: none"> • Urinary incontinence • Fecal incontinence • Loss of right eye functioning • Hand tremors • Impotency • Arthritis • Back pain • Abdominal pain • Pain in the whole body • Fatigue • Appetite loss • Aggression • Night terrors • Insomnia • Intrusive thoughts • Memory deficiency • Inability to concentrate • Paranoia • Suffers from dissociative episodes • PTSD • Anxiety • Inability to work • Inability to drive • Divorce • Excessive smoking



<p>K.O.</p> <ul style="list-style-type: none"> • Nablus 	<ul style="list-style-type: none"> • Bludgeoned • <i>Was unable to talk about the torture he endured</i> 	<ul style="list-style-type: none"> • Beaten right before his trial in order to get a false confession • Medical neglect 	<ul style="list-style-type: none"> • Back pain • Left hand pain • Left leg pain • Shoulder pain • Headaches • Insomnia • Fatigue • Suicidality • Paranoia • PTSD • Memory deficiency • Night terrors • Aggression • Depression • Inability to write • Inability to talk about the trauma
<p>M.A.</p> <ul style="list-style-type: none"> • Hebron 	<ul style="list-style-type: none"> • Bludgeoned with pipes • Lashed with wires • "Shabach Method" • Deprived sleep • Tortured with hot and cold water • Forced to sleep naked • Teeth removed • Forced into a dark prisoner transport vehicle • Wrists were tied to a tall window 	<ul style="list-style-type: none"> • Threats of murder by firearm • Denied legal advice/lawyer • Deprived sleep • Medical neglect • Captors demanded and took bribe (was released in return) 	<ul style="list-style-type: none"> • Vision loss • Spinal disc herniation • Dental damages • Memory deficiency • Night terrors • Phobias • Paranoia • Aggression • Appetite loss • Insomnia • Intrusive thoughts • PTSD • Depression • Inability to concentrate • Inability to take part in social events • Inability to consume media
<p>M.A.</p> <ul style="list-style-type: none"> • Ramallah 	<ul style="list-style-type: none"> • "Shabach Method" • Bludgeoned using pipe • Broke 5 teeth • Deprived toilet access 	<ul style="list-style-type: none"> • Blindfolded • Watched people become handicapped, insane, and die during interrogations 	<ul style="list-style-type: none"> • Dental damage • Chest pain • Headaches • Neck pain



	<ul style="list-style-type: none"> • Burned using cigarettes • Electrocutted • Solitary confinement for 7 months • Cold water poured on him • Urine poured on him • Tied to buildings to serve as a "human shield" 	<ul style="list-style-type: none"> • Threats of murder by firearm • Medical neglect • Denied legal advice/lawyer 	<ul style="list-style-type: none"> • Back pain • Legs pain • Impotency • Night terrors • Aggression • Inability to read/write • Appetite loss • Confusion • Depression • Memory deficiency • Inability to consume media
<p>A.A.</p> <ul style="list-style-type: none"> • Bethlehem • Dahariya Prison 	<ul style="list-style-type: none"> • "Shabach Method" • Bludgeoned all over his body by various objects including iron pipes • Lost consciousness from bag placed over his head so he could not breathe • Tortured with cold water while he was naked • Deprived sleep • Burned using cigarette (every day) • Tortured with electricity • Tortured in the genitals • Hair torn off his body • Teeth broken • Stabbed with needles under his fingernails • Left in the sewers 	<ul style="list-style-type: none"> • The cell in which he was being held was flooded • Murder threats • Witnessed the torture of other prisoners • Threats to arrest his family and torture them 	<ul style="list-style-type: none"> • Diabetes mellitus • High blood pressure • Chest palpitations • Arthritis • Pain all over body • Dizziness • Headaches • Tooth pain • Delusions • Memory deficiency • Mental disorders • Violent outbursts • Paranoia • Night terrors • Loss of sex drive • Nervous outbursts • His land was stolen • His family suffers from trauma • Inability to work • Psychiatric drug dependency • Attempted suicide twice
<p>M.B.</p> <ul style="list-style-type: none"> • Hebron • Tul Carem • Ramallah 	<ul style="list-style-type: none"> • Beaten by sticks and electronic cables until losing consciousness • Denied toilet access • Deprived food and water 	<ul style="list-style-type: none"> • Medical neglect • Denied legal advice/lawyer • Forced to give a false confession 	<ul style="list-style-type: none"> • Back, genital, eye pain • Loss of sexual desire • Occasional loss of consciousness • Nervousness



	<ul style="list-style-type: none"> • Fed salt water and rotten food mixed with worms • Hung from legs/ hands and sand bags were tied to him • A prisoner tried to rape him • Teeth were broken • Tortured in the genitals • Burned using cigarettes • Kept naked in a small cabin during the cold winter with no blanket or mattress • Death threats • Didn't see sunlight for two and a half years 	<ul style="list-style-type: none"> • Captors demanded and took bribe 	<ul style="list-style-type: none"> • PTSD • Nightmares • Memory deficiency • Inability to work • Desire to be alone, far from the people around him
<p>A.A.</p> <ul style="list-style-type: none"> • Jnaid Prison, Nablus 	<ul style="list-style-type: none"> • Kept in a small cabin (50cm X 50cm) • Hung from hands overnight while beaten • Burned using cigarette • Tortured with cold water • A bottle was inserted into his anus 		<ul style="list-style-type: none"> • Loss of all teeth • Inability to eat • Nervousness • Memory deficiency • Fear • Lack of ability/desire to leave his house • Low socioeconomic status • Beats his wife and his children • Inability to work
<p>I.A.</p> <ul style="list-style-type: none"> • Salafit (Samaria) 	<ul style="list-style-type: none"> • Bludgeoned by sticks and rubber pipes while hanging naked from ceiling • Hung out the window in the winter and cold water was poured on him • Loss of consciousness • Deprived sleep • Teeth broken • Handcuffed, naked on the floor 	<ul style="list-style-type: none"> • Denied legal advice/lawyer • Forced to give a false confession 	<ul style="list-style-type: none"> • Memory deficiency • Hopelessness • Inability to trust people • Impatience • Inability to read and write • His wife and children left him because he was accused of being a 'collaborator' • His car was burned • His parents' house became a target for stone throwers



<p>I.F.</p> <ul style="list-style-type: none"> • Hebron • Dahariya Prison 	<ul style="list-style-type: none"> • Teeth broken • Burned using cigarette • Beaten all over his body • Tortured with cold water during the winter • Stood naked next to an air conditioner • Death threats (for his family as well) • No access to toilet • Deprived sleep • Forced to drink soap which led to severe abdominal pain • Handcuffed in painful positions • A chair was placed on his head • Head covered by a urine-soaked bag • Coffee poured over his wounds • Hung by his feet to a ladder • Kept in a small cabin 	<ul style="list-style-type: none"> • Medical neglect • Denied legal advice/lawyer 	<ul style="list-style-type: none"> • Inability to orient himself • Leg, head and back pain • Instability • Mental disorder • Confusion • Independence deficiency • Nightmares • Loneliness • Inability to drive • Inability to work
<p>I.F.</p> <ul style="list-style-type: none"> • Jenin Mukataa • Jnaid Prison, Nablus • Residential home in Jenin 	<ul style="list-style-type: none"> • "Shabach Method" • Bludgeoned • Forced into a small closet for 4 days (150cm X 70cm X 20cm) • Forced labor • Lashed using wires • Solitary confinement 	<ul style="list-style-type: none"> • Blindfolded • Handcuffed • Interrogation and torture continued despite a full confession • Murder threats • Interrogated in a second location at a residential home in Jenin • Was never charged • Denied legal advice/lawyer • Medical neglect • Forced to give a false confession 	<ul style="list-style-type: none"> • Impotency • Inability to shower • Insomnia • Extensive psychological and psychiatric care • Night terrors • Suicidality • Aggression • Memory deficiency • PTSD • Depression • Compulsive eating • Flashbacks • Inability to read/write



		<ul style="list-style-type: none"> • Captors demanded and took bribe • His family was threatened 	<ul style="list-style-type: none"> • Inability to concentrate • Solitude • Inability to consume media • Inability to work • Excessive smoking
<p>Dr. D.M.</p> <ul style="list-style-type: none"> • Nablus Prison 	<ul style="list-style-type: none"> • Head covered • Handcuffed • Bludgeoned using pipes • Lashed using wires • Head hair plucked out • Pain inflicted to legs, head, chest, abdomen, and genitals until unconsciousness • Deprived food • Deprived water • Ear twisted • Medical neglect • Fed expired produce 	<ul style="list-style-type: none"> • Solitary confinement • Heard his brother being tortured in the next room • Murder threats • Deprived access to toilet • Swearing • Threats of murder by hanging • Forced to give a false confession 	<ul style="list-style-type: none"> • Suicidality and eventual suicide • Chest pains • Major cardiac complications due to medical neglect, physical abuse, and trauma he endured after heart surgery. Resulting kidney problems, eye problems, and elevated blood pressure. • Nausea • Joint pain • Headaches • Fatigue • Insomnia • Night terrors • Depression • PTSD • Loss of appetite • Phobias • Inability to take part in social events • Inability to work • Inability to read • Inability to consume media • 600,000 NIS was stolen • Car worth 150,000 NIS was stolen
<p>I.F.</p> <ul style="list-style-type: none"> • Jnaid Prison 	<ul style="list-style-type: none"> • "Shabach Method" • Forced into a closed trash can for a week (1m in height) • Deprived toilet access 	<ul style="list-style-type: none"> • Arrested over a hundred times • Verbal abuse 	<ul style="list-style-type: none"> • Back pain • Spinal disc herniation • Paresthesia in legs • Scars on eye and finger



	<ul style="list-style-type: none"> • Wounds salted • Extensive dental damage • Bludgeoned • Burned with cigarette 		<ul style="list-style-type: none"> • Sleepwalking • PTSD • Night terrors • Insomnia • Solitude • Phobias • Memory deficiency • Depression • Suicidality • Anxiety • Aggression • Compulsive behavior • Inability to work • Excessive smoking • Inability to concentrate • Separation from family
<p>A.I.</p> <ul style="list-style-type: none"> • Tulkarm Mukataa 	<ul style="list-style-type: none"> • Deprived toilet access • Deprived food • Deprived water • Burned with cigarette • Chained to a wooden beam 	<ul style="list-style-type: none"> • Forced to give a false confession • Asked, under torture, to state that he had intercourse with his sister • Sister, father, and aunt were murdered 	<ul style="list-style-type: none"> • Leg pain • Back pain • Loss of libido • Headaches • Night terrors • Insomnia • Loss of appetite • Memory deficiency • Phobias • Aggression • PTSD • Solitude • Inability to work • Inability to concentrate • Inability to consume media
<p>A(F).T.</p> <ul style="list-style-type: none"> • Jenin 	<ul style="list-style-type: none"> • "Shabach Method" • Tied to a tree • Blindfolded • Deprived sleep • Deprived food • Handcuffed 	<ul style="list-style-type: none"> • Interrogation took place in the woods • Not allowed to relieve himself • Threat of murder by firearm • Forced to give a false confession 	<ul style="list-style-type: none"> • Leg pain • Back pain • Dental damage • Loss of libido • Night terrors • Insomnia • Suicidality



	<ul style="list-style-type: none"> • Bludgeoned until unconscious • Tortured using cold water • Tooth removed 	<ul style="list-style-type: none"> • Deprived shower for 3 months • Denied legal advice/lawyer 	<ul style="list-style-type: none"> • Memory deficiency • Inability to concentrate • Anxiety • PTSD Paranoia • Aggression • Solitude • Alcohol abuse • Depression • Inability to write • Inability to maintain a romantic relationship • Excessive smoking
<p>S.R.</p> <ul style="list-style-type: none"> • Hebron • Ad Dahariya Prison 	<ul style="list-style-type: none"> • "Shabach Method" • Bludgeoned • Needles inserted under fingernails • Deprived toilet access • Medical neglect • Lashed using wires 	<ul style="list-style-type: none"> • Murder threats • Handcuffed • Blindfolded • Denied legal advice/lawyer • Captors demanded and took bribe (was not released in return) 	<ul style="list-style-type: none"> • Headaches • Back pain • Insomnia • Night terrors • PTSD • Memory deficiency • Confusion • Solitude • Inability to consume media • Inability to read/write
<p>N.Z.</p> <ul style="list-style-type: none"> • Salafit • Nablus Prison 	<ul style="list-style-type: none"> • Hung from legs and beaten all over body • Bludgeoned • Hung naked to a tree for many nights in the winter • Tortured using cold water • Forced to sit on a heater • Cans were placed under his body while the investigator stood on his back • Teeth broken • Burned with cigarette • Deprived toilet access • Deprived food • Deprived sleep • Handcuffed 	<ul style="list-style-type: none"> • Arrested several times since the first Intifada • Aware of the murders of 6 fellow inmates • Confined in a dark cellar for 6 months 	<ul style="list-style-type: none"> • Nose pain • Back pain • Vision deficiency • Memory deficiency • Mental disorders • Nightmares • Loss of appetite • Tantrums • Inability to work • Apathy • Inability to consume media • Solitude • Increased smoking • Loneliness



	<ul style="list-style-type: none"> • Medical neglect • Nose broken 		
<p>M.S.</p> <ul style="list-style-type: none"> • Jnaid Prison, Nablus 	<ul style="list-style-type: none"> • Handcuffed • Teeth broken • Melted, boiling plastic poured on leg and penis • Electrocuted until unconscious • Hung from legs and handcuffed • Bludgeoned with metal pipes 	<ul style="list-style-type: none"> • Murder threats • Verbal humiliation • Solitary confinement • Medical neglect • Denied legal advice/lawyer 	<ul style="list-style-type: none"> • Pain and problems in chest, legs, back, heart, kidneys • Cognitive fitness deficiency • Motor dysfunction • Night terrors • Hallucinations • Mental disorders • Loss of appetite • Weight loss • Memory deficiency • Fears • Lack of interest • Depression • Insomnia • Loss of self confidence • Inability to work • Inability to concentrate
<p>M.A.</p> <ul style="list-style-type: none"> • Jnaid Prison, Nablus • Mukataa building, Nablus 	<ul style="list-style-type: none"> • “Shabach Method”: Hung from hands for a month while head covered • Tortured with cold water • Deprived toilet access • Kept in a small crate for days • Heated until he couldn’t eat 	<ul style="list-style-type: none"> • Murder threats • Other prisoners were killed in his presence • Imprisoned 13 months • Medical neglect • Denied legal advice/lawyer • Captors demanded and took bribe (was released in return) 	<ul style="list-style-type: none"> • Skull fissures • Inability to stand for more than 5 minutes • Nightmares • Fears • Depression • Impatience • Lack of interest • Mental disorders • Insomnia • Inability to work • Increased smoking • Inability to maintain a relationship • Despondency, solitude • PTSD



<p>S.F.</p> <ul style="list-style-type: none"> • Dahariya Prison • Amin al Wakai building 	<ul style="list-style-type: none"> • "Shabach Method" • "Chinese Water Torture"^^ • Deprived toilet access • Tortured using cold water • Teeth broken • Legs burnt with iron chain • Rope pulled tight around penis • Forced to perform sodomy on himself with broken glass bottle • Sat in ice water for hours • Bludgeoned with metal chains and belt 	<ul style="list-style-type: none"> • Murder threats • Verbal humiliation • Forced to pay for his food in prison • Other prisoners killed in his presence • Denied legal advice/lawyer • Medical neglect 	<ul style="list-style-type: none"> • Vision deficiency • Impotency • Pain in head, legs • Memory deficiency • Lack of appetite • Nightmares • Nervousness • Mental disorders • Fears • Confusion • Inability to work • Need for psychiatric drugs • His home and his car were burned by the PA • Unstable family relations
<p>A.O.</p> <ul style="list-style-type: none"> • Abu-Dis • Mukataa, Ramallah • Beitunia 	<ul style="list-style-type: none"> • "Shabach Method" • Locked inside a hot container for 4 summer months • Denied toilet access • Bludgeoned • Restrained • Forced naked into a barrel filled with hot water • Blindfolded • Deprived sleep • Two teeth removed • Electrocutted • Deprived food • Deprived water • Wounds were salted • Medical neglect • Rubbed hot peppers on eyes • Burned by cigarettes 	<ul style="list-style-type: none"> • Witnessed the murder of two of his friends • Imprisoned for 11 months • Murder threats • Captors demanded and took bribe 	<ul style="list-style-type: none"> • Heart disease • Dental damage • Vocal cord damage • Headaches • Hearing deficiency • Eye problems • Diabetes • Elevated blood pressure • Hand pain • Impotency • Memory deficiency • Depression • Tantrums • Aggression • Paranoia • Night terrors • Insomnia • Solitude • Confusion • Flashbacks • Appetite loss • Inability to work • Lost access to his house



			<ul style="list-style-type: none"> • His car was lit on fire by the PA
<p>S.N.</p> <ul style="list-style-type: none"> • Nablus Prison • Army's Attorney General's office 	<ul style="list-style-type: none"> • "Shabach Method" • Tortured using cold water • Bludgeoned using metal pipes and a chair • Rope pulled tight around penis • Electrocuted • Teeth harmed and removed • Inflicted with ear pain • Left leg broken • Right hand broken • Deprived toilet access • Medical neglect 	<ul style="list-style-type: none"> • Imprisoned for 2 years • Murder threats • 6 months of solitary confinement • Was aware of the murder of fellow inmates • Forced to give a false confession 	<ul style="list-style-type: none"> • Ear inflammation • Impotency • Dizziness • Dental damage • Paranoia • Drug dependency • Dental damage and pain • Heartburn • Leg pain • Back pain • Testicle pain • Tantrums • Phobias • Aggression • Depression • Night terrors • Insomnia • Solitude • Memory deficiency • PTSD • Appetite loss • Inability to read • Inability to concentrate • Inability to work • Excessive smoking • All identifying documents confiscated
<p>F.S.</p> <ul style="list-style-type: none"> • Unknown olive plantation 	<ul style="list-style-type: none"> • "Shabach Method" • Bludgeoned using a hammer • Inflicted with genital pain • Stapled • 5 teeth broken • Tied to and dragged by a car 	<ul style="list-style-type: none"> • The assigned physician tortured him as well • Imprisoned for 5 years • Forced to give a false confession • Threat of raping his sisters 	<ul style="list-style-type: none"> • Leg pain • Back pain • Dental damage • Headaches • Insomnia • Scars • Confusion



	<ul style="list-style-type: none"> • Deprived toilet access • Medical neglect • Solitary confinement in a small room for 120 days (1m X 1m) • Toenails removed • Raped • Slashed 	<ul style="list-style-type: none"> • Witnessed the murder of a fellow inmate • Captors demanded and took bribe • Sentenced to capital punishment thrice • Murder threats 	<ul style="list-style-type: none"> • Memory deficiency • Night terrors • Aggression • Solitude • Phobias • PTSD • Flashbacks • Paranoia • Appetite loss • Inability to work
<p>M.I.</p> <ul style="list-style-type: none"> • Tulkarm 	<ul style="list-style-type: none"> • Bludgeoned using a metal pipe • Strangled using a wire • Burned with cigarette • Burned by melted plastic 	<ul style="list-style-type: none"> • Year prior to the arrest, her husband was murdered by the PA • Her son and her daughter were arrested as well • Her daughter was murdered by firearm during the arrest; no death certificate was issued • The PA murdered her sister, dumping her body on the road next to the Mukataa in Tulkarm. Her body had gunshot wounds and cigarette burns. 	<ul style="list-style-type: none"> • Pain in whole body • Blindness in one eye • Elevated blood pressure • Paralysis in left arm and legs for an extended period of time; could not fully rehabilitate • Fatigue • Night terrors • Insomnia • Suicidality • Solitude • Depression • Tantrums • Hearing noises • Her house was burned down during the arrest • Her remaining family fled to Israel illegally • Poverty • Inability to consume media • Inability to take care of children
<p>N.H.</p> <ul style="list-style-type: none"> • Nablus Prison 	<ul style="list-style-type: none"> • Hung from legs for 60 days • Bludgeoned • Denied toilet access 	<ul style="list-style-type: none"> • Murder threats • Rape threats • Threats of raping his sister • Forced to witness the murder of fellow inmates 	<ul style="list-style-type: none"> • Scarring • Pain in the whole body • Dizziness • Dental damage • Hand tremors



<ul style="list-style-type: none"> • Mountains near Nablus • Jnaid Prison, Nablus 	<ul style="list-style-type: none"> • Forced into a small iron chamber for 4 months where he could only stand • Forced labor • Burned with cigarette • Nails ripped from body • Insufficient food • Tied naked in the rain • Forced to sit on a bottle for hours (sodomy) • Teeth broken 	<ul style="list-style-type: none"> • Imprisoned for 5 years • Forced to give a false confession • Medical neglect 	<ul style="list-style-type: none"> • Leg pains • Headaches • Hallucinations • Phobias • Insomnia • Night terrors • Depression • Aggression • Suicidality • Appetite loss • Memory deficiency • Loss of identifying documents • Inability to work • Poverty • Inability to consume media • Inability to read and write • Lost connection to family due to fear of the PA
<p>F.S.</p> <ul style="list-style-type: none"> • Jenin Mukataa 	<ul style="list-style-type: none"> • "Shabach Method" • Lashed using wires • Bludgeoned using sticks • Burned with boiling water • Burned with cigarettes • Tortured using cold water • Denied toilet access • Hung from ceiling fan • Forced to stand on cups while holding building blocks • Forced into a closet for 12 days where he couldn't stand (1.5m X 2m) 	<ul style="list-style-type: none"> • Murder threats using firearm • Given the choice between a false confession and death • Forced to give a false confession • Medical neglect • Denied legal advice/lawyer • Was never charged • Was not made aware of the length or reason of his arrest 	<ul style="list-style-type: none"> • Inability to stand for more than a few minutes • Headaches • Appetite loss • Aggression • Memory deficiency • Insomnia • Night terrors • Confusion • PTSD • Inability to work • Inability to consume media • Inability to read and write • Fled to Israel, separated from his house in the West Bank • All identifying documents taken



<p>F.S.</p> <ul style="list-style-type: none"> • Jenin Mukataa 	<ul style="list-style-type: none"> • Bludgeoned using sticks and pipes • Tortured using cold water • Burned using hot water • Insufficient food • Forced into a closet for 30 days where he could not stand • Knife cuts in legs • Nails inserted into testicles • Nails inserted into penis • Nails inserted into legs • Nails inserted into head • "Shabach Method" • Left hand broken 	<ul style="list-style-type: none"> • Forced to strip naked • Blindfolded • Murder threats • Denied legal advice/lawyer 	<ul style="list-style-type: none"> • Reduced left hand function • Headaches • Back pain • Fatigue • Dizziness • Depression • Psychotic episodes • Night terrors • Insomnia • Flashbacks • Aggression • Confusion • Suicidality • PTSD • Paranoia • Phobias • Inability to read and write • Inability to work • Inability to consume media • Inability to take part in social gatherings
<p>R.K.</p> <ul style="list-style-type: none"> • Salafit 	<ul style="list-style-type: none"> • "Shabach Method" • Sacrum broken • Bludgeoned • Lashed using wires • Hung from legs • Teeth broken • Rope pulled tight around penis • Head banged against table • Forced to perform sodomy on himself by sitting on a large soft drink bottle • Denied toilet access • Deprived sleep • Forced outside, naked during winter 	<ul style="list-style-type: none"> • Murder threats • Aware of the murder of six of his fellow inmates; their bodies were burned in a pit in the yard • Sentenced with capital punishment • Was never charged • Denied legal advice/lawyer • Medical neglect • Forced to give a false confession 	<ul style="list-style-type: none"> • Dental damage • Back pain • Reduced functioning of fingers • Night terrors • Insomnia • Phobias • Depression • Loss of appetite • Memory deficiency • PTSD • Suicidality • Inability to work • Inability to consume media • Separated from his family in the West Bank due to fear of the PA



<p>R.J.</p> <ul style="list-style-type: none"> • Jenin Mukataa 	<ul style="list-style-type: none"> • Bludgeoned using firearms, chairs and other objects • Burned with cigarettes • Testicles and penis harmed • Forced to stand on one leg for an extended period of time • Denied toilet access • Denied shower access • Teeth broken • Forced under blankets during hot summer days • Burned using boiling oil 	<ul style="list-style-type: none"> • Murder threats using firearms during transportation to the prison and while in prison • Medical neglect • Was never charged • Denied legal advice/lawyer 	<ul style="list-style-type: none"> • Dental damage and pain • Headaches • Leg pain • Back pain • Arm pain • Appetite loss • Phobias • PTSD • Flashbacks • Paranoia • Solitude • Fatigue • Insomnia • Anxiety • Aggression • Night terrors • Memory deficiency • Inability to consume media • Inability to take part in social gatherings • Inability to concentrate • Inability to work
<p>H.M.</p> <ul style="list-style-type: none"> • Hebron • Ad Dahariya Prison 	<ul style="list-style-type: none"> • "Shabach Method" • Denied sufficient food • Bludgeoned using sticks and metal pipes • Forced outside naked, and cold water was poured on him on cold winter days • Teeth broken • Forced into a compartment (1.2m in height) • Lashed using wires • Denied toilet access 	<ul style="list-style-type: none"> • Sentenced to capital punishment • Hospitalized due to torture 6 times under pseudo-names • Murder threats • Was aware of murders of fellow inmates • Blindfolded • Medical neglect • Denied legal advice/lawyer 	<ul style="list-style-type: none"> • Heart attacks • Elevated blood pressure • Joint pain • Loss of libido • Dental damage • Pain in the whole body • Night terrors • Insomnia • Memory deficiency • Aggression • Solitude • Appetite loss • Inability to take part in social gatherings



<ul style="list-style-type: none"> • P.S. • Hebron • Ad Dahariya Prison • Mukataa, Hebron • Amin al-Wakai building, Hebron 	<ul style="list-style-type: none"> • "Shabach Method" • Bludgeoned • Inflicted with pain to genitals • Forced labor • Denied sufficient food and water • Denied shower access 	<ul style="list-style-type: none"> • Blindfolded • Medical neglect • Restrained • Murder threats • Humiliations • Denied legal advice/lawyer • Captors demanded and took bribe (was not released in return) 	<ul style="list-style-type: none"> • Bloated testicle • Back pain • Leg pain • Hand pain • Shoulder pain • Headaches • Right eye pain • Left ear pain • Inability to stand for more than a few minutes • Insomnia • Night terrors • Memory deficiency • Solitude • Depression • Fatigue • Phobias • Solitude • Paranoia • Aggression • Anxiety • Inability to write • Inability to consume media • Inability to take part in social events • Inability to work • Inability to concentrate • Intrusive thoughts
<p>F.H.</p> <ul style="list-style-type: none"> • Nablus Prison 	<ul style="list-style-type: none"> • Forced imprisonment • Murdered during captivity, therefore no additional information is available 		



All victims were assessed by professional, licensed psychologists and psychiatrists. These reports are based on the findings of those professionals. Each torture victim reported the organization by whom they were tortured and, in some cases, mentioned specific names of people involved.

- 97% of the prisoners reported having been tortured by the Palestinian Authority (PA). In many cases, that was the only organization mentioned, however some prisoners were able to identify more specific forces within the PA's structure.
- 11 of the victims specifically mentioned the Palestinian Authority's Preventive Security Forces, calling them "Amin al Wakai."
- 8 of the victims reported people from the PA's either general or military intelligence services.
- 2 of the victims mentioned the PA's "Force 17" unit.
- 4 of the victims mentioned Palestinian police forces or the police/security forces of the specific city in which they were arrested/imprisoned.

Legal and Factual Analysis

These cases constitute crimes against humanity according to Article 7 of the Rome Statute, specifically Article 7(1)(a), (e) and (f). The elements of this crime and its application to the facts will be specified in the following chapters.

A. "Widespread or Systematic"

Article 7(1) of the Rome Statute requires that for an attack to be considered a crime against humanity, it must be either "*widespread or systematic.*" "*Widespread*" refers to the "*large-scale nature of the attack, which should be massive, frequent, carried out collectively with considerable seriousness and directed against a multiplicity of victims.*"⁴ "*Systematic*" refers to "*the organized nature of the acts of violence and the improbability of their random occurrence.*"⁵

⁴ ICC Pre-Trial Chamber II, *Decision Pursuant to Article 15 of the ICC Statute on the Authorization of an Investigation into the Situation in the Republic of Kenya* [2010], ICC-01/09-19-Corr, (March 31, 2010), para. 95.

⁵ *Ibid.*, para 96.



This notice documents ample cases to demonstrate the widespread nature of the attacks. Abundant testimony exhibits that crimes against humanity have been carried out in different places over the West Bank for over a decade. The commission of crimes such as murder, torture, and unlawful imprisonment against political opponents in the furtherance of a wider campaign to subdue and discourage dissent with the PA is compelling evidence that those crimes were systematic in nature. A Human Rights Watch report states: *“In the 25 years since Palestinians gained a degree of self-rule over the West Bank and the Gaza Strip, their authorities have established machineries of repression to crush dissent, including through the use of torture.”*⁶ The relevant incidents are not limited and random. Instead, they have been and continue to be part of the PA’s governmental policy.

B. “Attack Directed Against Any Civilian Population”

For an attack to amount to a crime against humanity it must be *“directed against any civilian population”* according to Article 7(1) of the Rome Statute. The ICC Pre-Trial Chamber held that: *“The commission of the acts referred to in article 7(1) of the Statute constitute the ‘attack’ itself and, beside the commission of the acts, no additional requirement for the existence of an ‘attack’ should be proven.”* An attack need not be a military act but can be a *“campaign or operation carried out against the civilian population.”*⁷

For an attack to be directed against a civilian population, multiple instances of the relevant crimes enumerated in Article 7(1) must have been committed, in the form of a *“policy to commit such attack.”*⁸ A single isolated incident will not qualify. It is required that *“the State or organization actively promote or encourage such an attack against a civilian population.”*⁹ The term ‘civilian

⁶ Human Rights Watch, *„Two Authorities, One Way, Zero Dissent. Arbitrary Arrest & Torture Under the Palestinian Authority & Hamas”*, (October 2018), p. 1.

⁷ ICC Pre-Trial Chamber II, *Decision Pursuant to Article 61(7)(a) and (b) of the Rome Statute on the Charges of the Prosecutor Against Jean-Pierre Bemba Gombo* [2009], ICC-01/05-01/08, (June 15, 2009), para. 75, available at: <https://www.icc-cpi.int/pages/record.aspx?uri=699541>

⁸ United Nations General Assembly, Rome Statute of the International Criminal Court (last amended 2010), (17 July 1998), Article 7(2)(a), available at: <https://www.icc-cpi.int/resource-library/documents/rs-eng.pdf>

⁹ ICC, Elements of Crimes, Article 7, available at: <https://www.icc-cpi.int/nr/rdonlyres/336923d8-a6ad-40ec-ad7b-45bf9de73d56/0/elementsofcrimeseng.pdf>



population' is defined in Article 50(1) of the Additional Protocol I of the Geneva Convention as, *inter alia*, anyone who is not part of an armed force, member of militia or volunteer corps, and who is not engaging in the customs of war (for example, carrying arms openly).¹⁰ The Pre-Trial Chamber has further stated that *"the population targeted can include a group defined by its (perceived) political affiliations."*¹¹ The civilian population against which the attacks by the PA are directed is the Palestinian population of the West Bank. The attacks have specifically been aimed at individuals who do not cooperate with and/or do not support the PA government, especially against persons who are thought to be supporting or assisting Israel. Hence, the immediate victims of such crimes are various suspected or known political opponents, but the wider class of victims is the entire Palestinian population in the West Bank who are intimidated into submitting to the PA's regime. Therefore, the attacks carried out by the PA are directed against specific groups within the Palestinian population, defined by their (real or perceived) political affiliations.

C. "With Knowledge of the Attack"

Article 7(1) of the Rome Statute requires that for crimes against humanity to be committed, there must be "knowledge of the attack." The perpetrator must have knowledge *"that the conduct was part of or intended the conduct to be part of a widespread or systematic attack against a civilian population."*¹² However, the perpetrator need not know all the characteristics or precise details of the plan, policy, or attack of the State or organization to have the requisite participation in and knowledge of a widespread or systematic attack against a civilian population. The mental element in the intent clause *"is satisfied if the perpetrator intended to further such an attack."*¹³

The perpetrators of the underlying criminal acts had the requisite knowledge and intent to fulfill Article 7(1) of the Rome Statute. That the acts of violence and intimidation described herein were

¹⁰ Definition of Civilians and Civilian Population." *Treaties, States Parties, and Commentaries - Additional Protocol (I) to the Geneva Conventions, 1977 - Part IV : Civilian Population - Section I -- General Protection against Effects of Hostilities - Chapter II -- Civilians and Civilian Population*, ihl-databases.icrc.org/ihl/WebART/470-750064?OpenDocument.

¹¹ ICC Pre-Trial Chamber II, *Prosecutor v. William Samoei Ruto and Joshua Arap Sang, Decision on the Confirmation of Charges Pursuant to Article 61(7)(a) and (b) of the Rome Statute* [2012], (ICC-01/09-01/11), (February 4, 2012), para. 164, available at: <https://www.icc-cpi.int/pages/record.aspx?uri=1314535>

¹² ICC, *Elements of Crimes*, Article 7, available at: <https://www.icc-cpi.int/NR/rdonlyres/336923D8-A6AD-40EC-AD7B-45BF9DE73D56/0/ElementsOfCrimesEng.pdf>

¹³ *Ibid.*



carried out predominantly against individuals politically opposed to the PA is strong prima facie evidence that those carrying out the individual actions knew precisely why such individuals were singled out for abuse; it was not a random selection.

D. Murder

The ICC's Element of Crimes provides that for the crime of murder to constitute a crime against humanity, the following factors must be present:

- "1. The perpetrator killed one or more persons.*
- 2. The conduct was committed as part of a widespread or systematic attack directed against a civilian population.*
- 3. The perpetrator knew that the conduct was part of or intended the conduct to be part of a widespread or systematic attack against a civilian population."*¹⁴

The perpetrator must have intended to engage in killing one or more persons, meant to cause death, or was aware that death would occur in the ordinary course of events.¹⁵ The death of a victim must have occurred as a result of an act or of an omission of the perpetrator.¹⁶ The Palestinian individuals' testimonies herein presented evidence the murder of one or more persons. The testimonies describe how individuals' friends, family, and other acquaintances have been killed by the PA Security Forces, partially as an intimidation method. One of the murders in question took place while the victim was in the custody of the police and/or security forces in Nablus Prison. Another murder occurred after the victim was freed from Jnaid Prison in Nablus. He was killed by Palestinian officials upon returning to PA territory. Overall, there have been four deaths as a result of the torture; two of the deaths were directly at the hands of the PA, and two were due to the psychological and physical effects of the torture. The requirements for crime against humanity of murder are hence fulfilled.

¹⁴ ICC, Elements of Crimes, Article 7(1)(a), available at: <https://www.icc-cpi.int/NR/rdonlyres/336923D8-A6AD-40EC-AD7B-45BF9DE73D56/0/ElementsOfCrimesEng.pdf>

¹⁵ ICTY Appeals Chamber, *Prosecutor v. Vlastimir Dordevic Judgement* [2014], (IT-05-87/1-A), (January 27, 2014), para. 548, available at: <http://www.icty.org/x/cases/djordjevic/acjug/en/140127.pdf>

¹⁶ ICTY Appeals Chamber, *Prosecutor v. Kvočka et. al.* (IT-98-30/1-A) Judgement [2005], (February 28, 2005), para. 251, available at: <http://www.icty.org/x/cases/kvočka/acjug/en/kvo-aj050228e.pdf>



E. Imprisonment

For imprisonment or other severe deprivation of personal liberty to amount to crimes against humanity, the following factors must be present:

- “1. The perpetrator imprisoned one or more persons or otherwise severely deprived one or more persons of physical liberty.*
- 2. The gravity of the conduct was such that it was in violation of fundamental rules of international law.*
- 3. The perpetrator was aware of the factual circumstances that established the gravity of the conduct.*
- 4. The conduct was committed as part of a widespread or systematic attack directed against a civilian population.*
- 5. The perpetrator knew that the conduct was part of or intended the conduct to be part of a widespread or systematic attack directed against a civilian population.”¹⁷*

Imprisonment is frequently associated with the commission of the crimes of murder and torture. The imprisonment of those who are deemed enemies of the PA is frequently a precursor for their torture and, in some case, death. Where such acts of imprisonment are conducted without a legal basis, it is indicated that they violate international criminal law. An initially lawful act may become unlawful when certain procedural rights and guarantees fail to be kept.¹⁸ Legal imprisonment requires adherence to procedural codes. Police forces and public officials must be knowledgeable of these directives and are required to abide by them. When the local authorities uphold imprisonment contrary to judicial order, they knowingly participate in illegal behavior. All elements of the crime against humanity of imprisonment are therefore fulfilled.

¹⁷ ICC, Elements of Crimes, Article 7(1)(e), available at: <https://www.icc-cpi.int/NR/rdonlyres/336923D8-A6AD-40EC-AD7B-45BF9DE73D56/0/ElementsOfCrimesEng.pdf>

¹⁸ ICTY Trial Chamber III, *Prosecutor v. Jadranko Prlić et al.* Judgement [2013], IT-04-74-T, (May 29, 2013), para. 63-68, available at: <http://www.icty.org/x/cases/prlic/tjug/en/130529-1.pdf>



F. Torture

According to the ICC's Elements of Crimes, torture occurs where:

- "1. The perpetrator inflicted severe physical or mental pain or suffering upon one or more persons.*
- 2. Such person or persons were in the custody or under the control of the perpetrator.*
- 3. Such pain or suffering did not arise only from, and was not inherent in or incidental to, lawful sanctions.*
- 4. The conduct was committed as part of a widespread or systemic attack directed against a civilian population.*
- 5. The perpetrator knew that the conduct was part of or intended the conduct to be part of a widespread or systematic attack directed against a civilian population."*¹⁹

Article 7(1)(f) of the Rome Statute does not require any special purposes of inflicting pain and suffering upon the victim and is not limited to persons acting as, or with the consent or acquiescence of, a public official or in an official capacity.²⁰

The element of inflicting severe physical or mental pain or suffering upon one or more persons is fulfilled by the actions of the PA's employees and agents. Each of the 52 testimonies submitted with this notice prove that physical and mental torture were employed by the PA during custody. The PA tortured the victims using a wide range of methods ranging from being hung from the ceiling and beaten repeatedly, to solitary confinement in restrictively small spaces, to forced sodomy with broken glass bottles.

The second condition for the crime against humanity of torture is that the victim be in custody or under control of the perpetrator. The testimonies show that the cases of torture and abuse occurred during the arrest process and/or during detention. Therefore, this criterion is clearly fulfilled.

¹⁹ ICC, Elements of Crimes, Article 7(1)(f), available at: <https://www.icc-cpi.int/NR/rdonlyres/336923D8-A6AD-40EC-AD7B-45BF9DE73D56/0/ElementsOfCrimesEng.pdf>

²⁰ Johan D. Van Der Vyver, Torture as a Crime under International Law, vol. 67 Alb. L. Rev., (2003), p. 437.



The third criterion, namely that the pain and suffering did not arise from and was not inherent in or incidental to lawful sanctions, is met as well. Article 108 of the Penal Code and Article 280 of the PLO Revolutionary Law of 1979 actively criminalized torture, as defined in Article 1 of the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment of 1984.²¹ Article 13 of the Palestinian Basic Law renders confessions made under torture invalid.²² It also appears that the use of torture is an unlawful practice under the local Palestinian law, whereby the third criterion is also given. Furthermore, the use of torture in the West Bank by PA officials, including police officers and special forces, was widespread. Though placed in different jails in the West Bank, many prisoners described specific and uniform torture methods, showing consistency between jails. This is a strong indication that systematic torture was ordered from above, and not at the discretion of a single official.

²¹ The Palestine Gazette, *An Ordinance to Provide a General Penal Code for Palestine*, Article 108, (September 1936), p. 973, available at: https://www.nevo.co.il/law_html/law21/PG-e-0633.pdf. Article 108 reads: "Any person employed in the public service who subjects or orders the subjection of any person to force or violence for the purpose of extorting from him or from any member of his family confession of an offence or any information relating to an offence, is guilty of a misdemeanor".

²² The Palestinian Basic Law, 2003 Amended Basic Law, Article 13, (March 18, 2003). Article 13 reads: "1. No person shall be subject to any duress or torture. Indictees and all persons deprived of their freedom shall receive proper treatment. 2. All statements or confessions obtained through violation of the provisions contained in paragraph 1 of this article shall be considered null and void."



Admissibility on the Principle of Complementarity

Introduction

In order for the Office of the Prosecutor (OTP) to open an investigation, it must verify the three admissibility requirements as set out in Article 53 of the Rome Statute; namely the principles of gravity, complementarity, and interest of justice. This report focuses on the principle of complementarity because it reveals a serious problem with the PA's claim to have a good, working independent judicial framework. In reality, the PA's government can and does control the judicial system to further political interests. Because of this absolute political control, there is no prospect of improvement regarding future investigations, prosecutions, or policy changes.

Complementarity Article 17 of the Rome Statute

In the case of former Congolese warlord Germaine Katanga, the ICC Appeals Chamber established an empirical test to verify the complementarity requirement under Article 17 of the Rome Statute.²³ The Court considers the presence or the absence of national proceedings in the relevant state by asking the empirical question: "Are there on-going investigations or prosecutions, or have investigations been carried out and a decision made not to prosecute?"²⁴ In other words, did the State of Palestine conduct relevant national investigations of the alleged crimes against humanity committed against the 52 Palestinians in question? Unfortunately, the answer is no. The PA's officials enjoy an alarming level of impunity.

This is also what the Office of the United Nations High Commissioner for Human Rights (OHCHR) concluded in July 2017. He determined that the State of Palestine has not complied with the calls for accountability and he urged the State of Palestine to conduct a prompt, impartial, and independent investigation of all alleged violations of international human rights.²⁵

²³ ICC Appeals Chamber, *The prosecutor v. Germaine Katanga and Mathieu Ngudjolo Chu Judgment (2009)*, ICC-01/04-01/07-1497, (September 25, 2009), §78, available at : https://www.icc-cpi.int/CourtRecords/CR2009_06998.PDF

²⁴ *Ibidem*.

²⁵ Human Rights Council, *Ensuring accountability and justice for all violations of international law in the Occupied Palestinian Territory, including East Jerusalem : comprehensive review on the status of recommendations addressed to all parties since 2009, A/HRC/35/19*, available at : https://www.ohchr.org/EN/HRBodies/HRC/RegularSessions/Session37/Documents/A_HRC_37_41.docx.



Freedom House has reported in this regard that the allegations of torture and other abuse by PA security forces are common, and officers are rarely punished for such violations.²⁶ Amnesty International confirmed that the impunity for human rights abuses in the West Bank and Gaza have persisted and that no criminal investigations have successfully been launched.²⁷ Consequently, victims do not have any access to justice and reparations.

In summary, the relevant authorities have not competently exercised adequate judicial powers in their territory. Law enforcement officials systematically fail to open investigations or prosecute the PA's officers despite the judicial framework that is theoretically in place. Under Palestinian Basic Law, PA President Mahmoud Abbas, must authorize all judicial appointments. As a result, each serving judge owes his position and its continuity to Abbas. It is no surprise that these judges will not investigate Abbas' high officers, let alone prosecute them. Additionally, many systematic, politically-motivated crimes occur in penal institutions within the West Bank, all of which are controlled by the PA. We conclude that the PA's judicial framework is in the hands of the politicians who are abusing the system to further their own agendas. Therefore, there is no prospect of improvement regarding future investigations, prosecutions, or policy changes. An investigation by the OTP has the power to overturn this systematic injustice.

²⁶ Freedom House, « Freedom in the World 2018 : West Bank Profile », available at : <https://freedomhouse.org/report/freedom-world/2018/west-bank>

²⁷ Amnesty International, *Report 2017/2018 – The state of World Human Rights, (February 2018)*, available at : <https://www.amnesty.org/en/documents/pol10/6700/2018/en/>



Conclusion

In conclusion, all elements of the crimes against humanity of murder, imprisonment, and torture are satisfied. The testimonies submitted prove that crimes against humanity have been committed systematically under the PA's regime. The mechanical oppression of political opponents under Yasser Arafat has been continued by Mahmoud Abbas. It is evidenced that the same methods and mechanisms have been employed by the PA for more than 20 years. Therefore, it is of utmost importance to shine a light on these human rights violations committed by the PA. Hence, we respectfully submit that the evidence presented in this notice supports the allegations made against Mahmoud Abbas for crimes against humanity committed against the Palestinian population of the West Bank, and we call for the ICC to open a preliminary examination into this case.