

**IN THE UNITED STATES DISTRICT COURT FOR
THE
SOUTHERN DISTRICT OF NEW YORK**

STUART FORCE, individually and as the personal)
representative of the Estate of TAYLOR FORCE,)
and HANANEL GEZ,)

Plaintiffs,)

v.)

PALESTINIAN AUTHORITY and PALESTINE)
LIBERATION ORGANIZATION,)

Defendants.)

Civil No. _____

JURY DEMAND

COMPLAINT

Plaintiff Stuart Force, individually and as the personal representative of the Estate of Taylor Force, and Hananel Gez, on his own behalf, with personal knowledge as to themselves and upon information and belief and the investigation of their counsel as to all other allegations, hereby assert claims for damages for violations of the Anti-Terrorism Act (“ATA”) against the Palestinian Authority (the “PA”) and the Palestine Liberation Organization (the “PLO”) (collectively, “Defendants”) and in support thereof, allege as follows:

INTRODUCTION

1. As the U.S. Supreme Court noted in *Fuld v. Palestine Liberation Organization*, “combating terrorism is ... an urgent objective of the highest order.” *Fuld v. Palestine Liberation Organization*, 606 U.S. 1, 20 (2025). As a result, “[t]he Federal Government, relatedly, has a strong interest in permitting American victims of international terror to pursue justice in domestic courts.” *Id.* That is precisely what Plaintiffs seek here.

2. Through a gruesome program, commonly referred to as “Pay for Slay,” the PA and/or the PLO pay monthly salaries to individuals imprisoned for committing acts of terror, monthly stipends to those injured during acts of terror, and stipends to the family members of those killed while committing such acts.

3. By establishing financial incentives for imprisoned terrorists and the families of dead terrorists, the PA and PLO have created a terrorism turnstile—rewarding terrorists who are either imprisoned or killed, thereby creating the space and monetary incentives for new would-be terrorists to take their place. That is textbook aiding and abetting terrorism.

4. For the past 30 years, Defendants PA and PLO have openly placed a bounty on the heads of Jews and foreign nationals, including Americans, by paying millions of dollars in salaries or compensation every year to the thousands of Palestinians who are imprisoned or injured—or to their families if they were killed—in connection with committing a terror attack against Jews or Israelis.

5. For example, Abdullah Barghouti is a bomb-building member of Hamas whose bombs caused the murder of 67 people during the Second Intifada, for which he is serving 67 life sentences.¹ He has received monthly salary payments from Defendants PA and PLO since his arrest, payments totaling 1,324,400 Israeli shekels, (\$395,107) through September 26, 2025.² The victims of Barghouti’s bombs include Israeli, American, Dutch, and French citizens.

¹ Abdullah Barghouti prepared explosives for a variety of suicide bombings at civilian population centers throughout Israel during the Second Intifada, including at Sbarro restaurant in Jerusalem on August 9, 2011 (15 people murdered, including seven children); at Café Moment in Jerusalem on March 9, 2002 (11 people murdered); at Sheffield Club in Rishon Letzion on May 7, 2002 (15 people murdered); at Hebrew University in Jerusalem on July 31, 2002 (11 people murdered, including five U.S. citizens); and on a bus in Tel Aviv on September 19, 2002 (six people murdered). Defendants have rewarded him with over one million shekels for these acts.

² This figure is based on the latest exchange rate.

6. Defendants PA and PLO have instructed their people for years that, as Palestinians, they have the “right” to kill Israelis and foreign nationals, including Americans, under international law.³ Defendants repeatedly and publicly claim the right to commit the politically motivated murder of civilians, including Americans.

7. A sizeable portion of the PA and PLO’s annual budget is dedicated to incentivizing terror.⁴ Even in times of financial distress, the PA and PLO are committed to growing the number of Palestinians eligible for such payments. Defendants PA and PLO have never hidden their

³ Defendant PA frequently cites United Nations General Assembly Resolutions 3236 and 3246, which, it claims, grant Palestinians the right to use “all means,” including “armed struggle,” to promote Palestinian political goals. The PA claims that every terror attack and murder committed by Palestinians for political nationalist reasons is protected under international law. After a federal jury in 2015 found Defendant PA liable under the ATA for providing material support for the murder of four and the injuring of five American civilians in Israel, a senior PA leader said the decision was political because those killings were “sanctioned by international law and UN resolutions.” *See Al-Hayat Al-Jadida* [official PA daily]; Feb. 27, 2015; G.A. Res. 3246 (XXIV), U.N. GAOR, 24th Sess., Supp. No. 80, at 13, U.N. Doc. A/RES/3246 (1974); G.A. Res. 3236 (XXIX), U.N. GAOR, 29th Sess., Supp. No. 31, at 106, U.N. Doc. A/RES/3236 (1974).

⁴ After Israeli non-governmental organization Palestinian Media Watch (“PMW”) exposed the salary figures each year under Pay for Slay in 2011, the PA stopped publishing its budget. The PA has not published its budget since at least 2019, though the last published budgets revealed that approximately 6 to 8% of the budget was spent on Pay for Slay. *See* Itamar Marcus, *PMW Exclusive: Palestinian Authority publishes new budget; continues to defy US and Europe by rewarding terror*, PALESTINIAN MEDIA WATCH (Mar. 18, 2018), <https://palwatch.org/page/14029>. Since the PA has repeatedly announced there are no changes to its allotment of resources to Pay for Slay and has even bragged that the allotment has remained the same, Plaintiffs surmise that the proportion spent on Pay for Slay is roughly equivalent to years’ past. *See* Itamar Marcus & Nan Jacques Zilberdik, *Salaries rewarding terrorists won’t be stopped, says Director of PLO Commission of Prisoners*, PALESTINIAN MEDIA WATCH (Oct. 2, 2018), <https://palwatch.org/page/14753>:

Director of [PLO] Commission of Prisoners and Released Prisoners' Affairs Qadri Abu Bakr emphasized that the leadership, led by [PA] President Mahmoud Abbas, will continue to support the resolve of the prisoners and their families and will not succumb to the Israeli and American pressures calling to stop the Martyrs' (Shahids) and prisoners' salaries (rawatib) and allowances (mukhassasat). [Official PA daily *Al-Hayat Al-Jadida*, Sept. 21, 2018].

glorification of mass murder and have long publicly celebrated Palestinian terrorists and terrorism, including in PA Ministry of Education schools, on PA-owned and controlled official television, in social media, and on other publicly accessible platforms.

8. Plaintiffs are American families seeking justice for either the loss of their loved ones or personal injury to themselves as the result of Palestinian terrorism. The victims deserve closure. Under United States law, Plaintiffs are legally entitled to compensation from those who aid and abet terrorist actions harming Americans under the Anti-Terrorism Act of 1992 and the Justice Against Sponsors of Terrorism Act.

9. In April 2025, the U.S. Supreme Court affirmed the constitutionality of the Promoting Security and Justice for Victims of Terrorism Act (“PSJVTA”), which grants federal courts personal jurisdiction over Defendants PA and PLO based, in part, on their Pay for Slay program.

10. Plaintiffs Force and Gez are American citizens who have been personally injured or whose family members were personally injured by acts of international terrorism. Plaintiffs whose killers or assailants were induced to act by Defendants’ comprehensive campaign of incitement to terror by Defendants, which included promises of compensation from Defendants should they be arrested or killed.

11. More specifically, Plaintiff Force lost his son Taylor Force to a Palestinian terrorist in March 2016. Plaintiff Gez was injured in a terror attack in May 2025 while driving his wife Tzeela Gez and their unborn child, Ravid Haim Gez, to the hospital to be delivered. While Plaintiff Gez survived the attack, both his wife and son perished.

12. As of the writing of this Complaint, upon information and belief, Taylor Force’s murderer continues to receive payments from Defendants, while, upon information and belief,

the family of the terrorist who injured Plaintiff Gez and killed his wife and son has received at least one payment of 6,000 shekels, and subsequent monthly payments of 1,400 shekels since June 2025. The existence of the Pay for Slay policy has been confirmed by former Prime Minister Dr. Salam Fayyad⁵ in public statements in 2019, as well as by PA's President Mahmoud Abbas in February of 2025.

13. Defendants' payment scheme, in conjunction with a relentless campaign glorifying terrorism, incited the terrorists who injured Plaintiff Gez and murdered Plaintiff Force's son. The promise of future reward and honorifics induced the terrorists to commit these acts. Plaintiffs therefore bring this suit against Defendants PA and PLO under the Anti-Terrorism Act (ATA), which prohibits the provision of material support for acts of international terrorism committed against U.S. citizens.

PLAINTIFFS

12. Plaintiff **Stuart Force** is an American citizen whose son Taylor Force, also an American citizen, was murdered in Tel Aviv, Israel, on March 8, 2016, at age 28, by a Palestinian terrorist named Bashar Massalha. Massalha was immediately eliminated by Israeli security forces. As a result of the Defendants' actions and the terrorist they induced to murder his son, Plaintiff Force has been deprived of the services, society, company, guidance, and companionship of his son Taylor and has suffered, and continues to suffer, severe mental and emotional pain and distress. Plaintiff Force also believes that the stress and anguish of losing Taylor contributed to his wife Robbi L. Force's death earlier this year. Plaintiff Force is the personal representative of the Estate of Taylor Force and brings this action individually and behalf of the Estate of Taylor Force.

⁵ Maurice Hirsch, Adv., Itamar Marcus & Nan Jacques Zilberdik, *PMW Special Report: Israel must implement 2nd half of anti- "Pay-for-Slay" law before the end of 2019*, PALESTINIAN MEDIA WATCH (Nov. 18, 2019), <https://palwatch.org/page/16842>.

13. Plaintiff **Hananel Gez** is a dual American-Israeli citizen who was injured in a terror attack by Palestinian terrorists, including one named Naael Samarah, and whose wife Tzeela Gez, an Israeli citizen, and son Ravid Haim Gez, were murdered in the same attack on May 14, 2025. The terrorist attack took place while the couple was traveling to the hospital to deliver their fourth child, Ravid Haim Gez. While Tzeela died immediately, baby Ravid Haim succumbed to his wounds 15 days later, on May 29, 2025. Plaintiff Gez also was wounded in the terror attack, where he suffered from shrapnel lodged in his chest. Three weeks after the attack, Plaintiff Gez had surgery to remove the shrapnel. Meanwhile, the Israeli Defense Forces (IDF) eliminated Samarah in a counter-terrorism operation on May 17, 2025. Hananel Gez brings this action individually. As a result of the injuries caused to Plaintiff Gez and his family by the actions of Defendants described herein, Plaintiff Gez has suffered, and continues to suffer, severe emotional and psychological damage, as well as physical pain from his injuries. As a result of losing his wife and son, Plaintiff Gez has been deprived of the services, society, company, guidance, and consortium of his loved ones.

DEFENDANTS

14. Defendant **PLO** is a political umbrella organization that claims to represent the world's Palestinians. The PLO is, and at all relevant times was, a legal person, as defined by 18 U.S.C. §2331(3).

15. Defendant **PA** is the governing body of the Palestinian Territories in the West Bank. The PA is, and at all times was, a legal person as defined by 18 U.S.C. §2331(3). The governing party of the PA (and the largest dominant political faction of the PLO) is **Fatah**, which effectively controls both the PLO and the PA. Mahmoud Abbas serves as the President of the PA and Chairman of both the PLO and Fatah. Abbas was first elected as President of the PA in January 2005 and has

refused to hold elections since then, even cancelling scheduled elections when it was clear that his party would lose. In 2007, Abbas suspended the Palestinian Legislative Council, the PA's parliament, and in 2018, he formally dissolved it. He has ruled and enacted laws by presidential decree during this period.

JURISDICTION AND VENUE

16. This Court has subject matter jurisdiction pursuant to 18 U.S.C. §§ 2333 and 2334, as this is an action initiated by “national[s] of the United States injured in [their] person, property, or business by reason of an act of international terrorism, or [their] estate, survivors, or heirs.” *See* 18 U.S.C. § 2333(a). Insofar as this action “aris[es] under the Constitution, laws, or treaties of the United States,” subject matter jurisdiction is also conferred to this Court. 28 U.S.C. § 1331.

17. Defendants PA and PLO have consented to this Court exercising personal jurisdiction under the Promoting Security and Justice for Victims of Terrorism Act of 2019, (the “PSJVTa”).

18. Defendants, upon information and belief, have consented to jurisdiction under the first element set forth in the PSJVTa, which provides that a defendant is “deemed to have consented to personal jurisdiction,” pursuant in ATA cases if, after April 18, 2020, the defendant has made any payment “(i) to any payee designated by any individual who, after being fairly tried or pleading guilty, has been imprisoned for committing any act of terrorism that injured or killed a national of the United States, if such payment is made by reason of such imprisonment; or (ii) to any family member of any individual, following such individual’s death while committing an act of terrorism that injured or killed a national of the United States, if such payment is made by reason of the death of such individual.” 18 U.S.C. § 2334(e)(1)(A)(i)–(ii).

19. “Congress and the President made a considered judgment [to] subject the PLO and PA to liability in U. S. courts as part of a comprehensive legal response to ‘halt, deter, and disrupt’

acts of international terrorism that threaten the life and limb of American citizens.” *Fuld*, 606 U.S. at 20 (quoting H. R. Rep. No. 115–858, pp. 7–8 (2018)).

20. Defendants PA and PLO have also consented to jurisdiction under a second basis provided by the PSJVTA. The statute provides that a defendant “shall be deemed to have consented to personal jurisdiction” in ATA cases if, after January 4, 2020, the defendant “conducts any activity while physically present in the United States on behalf of the Palestine Liberation Organization or the Palestinian Authority,” 18 U.S.C. § 2334(e)(1)(B)(iii), subject to specified exceptions that are not satisfied here.

21. The PA’s Ministry of Foreign Affairs acts as the PLO’s agent in connection with activities in the United States. Defendants have engaged in propaganda activities and proselytizing from the United States, including by conducting press conferences and creating and distributing informational materials.

22. Defendants have maintained and updated a website and X and Facebook accounts in the name of the State of Palestine, through which they publish communications in English adapted to or intended to influence the public within the United States. Facebook and X are United States-based social media companies.

23. For instance, Defendants named their UN Mission’s X account as simply “State of Palestine” on X. Only in the description and handle do Defendants clarify that it is the “Official X of the Mission to the United Nations.” With the location of the account listed as “New York,” Defendants disseminate propaganda that has no relation to their official UN activities. Defendants’ X account updates have included communications intended to influence the public within the United States in furtherance of Defendants’ political interests and/or to affect U.S. foreign policy.

24. For instance, State of Palestine posted on X on October 13, 2025, upon the recent hostage-prisoner exchange between Israel and Hamas, “1968 captives freed. 77 killed by Israel in Israeli detention centers over the past two years. Over 10,000 remain unlawfully held captive. 360 children remain behind bars.” Defendants portray prisoners, those held in Israel for terrorism-related crimes, of being “captives” equivalent in innocence to the Israeli civilians ripped from their homes by terrorists.⁶ Other posts with no connection to their U.N. activities appear on their X account, including promoting or reposting Gazan journalists and celebrities who accuse Israel of genocide⁷ and accusing Israel of killing journalists in Gaza.⁸

25. In one post from May 2021, Defendants praised Paris Hilton for recognizing “genocide” and “ethnic cleansing” in the Palestinian territories.⁹

26. Defendants also have used one of their official press outlets WAFA to publish communications in English adapted to and/or intended to influence the public within the United States in furtherance of Defendants’ political interests and/or to affect U.S. foreign policy. The topic categories on the website indicate as much—there are specific sections on this website dedicated to discussion of the “occupation” and “prisoners,” which, as described below, include Palestinian terrorists who benefit from Defendants’ Pay for Slay program.

27. Defendants’ propaganda campaign, aimed at influencing the public within the United States in furtherance of Defendants’ political interests and/or to affect U.S. foreign policy, has existed for years and long before the October 7 terror attacks in which the Palestinian terrorist group

⁶ @Palestine_UN, X (Oct. 13, 2025, 3:58 PM), https://x.com/Palestine_UN/status/1977826205312401409.

⁷ @palpress24, X (Sept. 16, 2025, 5:46 PM), <https://x.com/PalPress24/status/196806899935123544>; @Palestine_UN, X (Sept. 14, 2025, 9:39 PM), https://x.com/Palestine_UN/status/1967402886532628619; @ezzingaza, X (Sept. 13, 2025, 3:07 PM), <https://x.com/ezzingaza/status/1966941704415514814>, @Palestine_UN, X (Mar. 2, 2025, 9:31 PM), https://x.com/Palestine_UN/status/1896387995022106656.

⁸ @Palestine_UN, X (Mar. 24, 2025, 10:25 AM), https://x.com/Palestine_UN/status/1904177716389097798.

⁹ @Palestine_UN, X (May 16, 2021, 8:16 AM), https://x.com/Palestine_UN/status/1393903235975483392.

Hamas, along with Palestinian civilians, invaded Israel and slaughtered more than 1,200 individuals and kidnapped hundreds more. A small sampling of Defendants' propaganda follows:

- **February 9, 2022:** Defendants published an article entitled, "Palestinian Central Council suspends recognition of Israel until it recognizes State of Palestine[.]"¹⁰
- **December 4, 2022:** Defendants published an article entitled, "Foreign Ministry says world needs to deal with Israeli occupation as an apartheid regime[.]"¹¹
- **October 2, 2023:** Defendants allege that reports about "Israeli economic facilities are misleading, occupation responsible for financial crisis[.]"¹²

28. Defendants published the following on their website on October 7, 2023:

- **October 7, 2023:** Shockingly, mere hours after Hamas invaded Israel in the deadliest attack against Jews since the Holocaust, Defendants continued their propagandistic vitriol, alleging:
 - "Four killed in Gaza in an Israeli shelling. . ." ¹³
 - "Journalist killed in an Israeli attack on Gaza. . ." ¹⁴
 - "Minster of Health declare a state of emergency in all hospitals" because several Palestinians were killed by "Israeli attacks on the Gaza Strip." ¹⁵
 - "Death toll of Israeli aggression on Gaza rises to 198, 1,610 injured." ¹⁶

¹⁰ *Palestinian Central Council suspends recognition of Israel until it recognizes State of Palestine*, WAFA NEWS AGENCY (Feb. 22, 2022), <https://english.wafa.ps/Pages/Details/127987>.

¹¹ *Foreign Ministry says world needs to deal with Israeli occupation as an apartheid regime*, WAFA NEWS AGENCY (Dec. 4, 2022), <https://english.wafa.ps/Pages/Details/132198>.

¹² *Finance Ministry: Reports about Israeli economic facilities are misleading, occupation responsible for financial crisis*, WAFA NEWS AGENCY (Oct. 2, 2023), <https://english.wafa.ps/Pages/Details/137879>.

¹³ *Four killed in Gaza in an Israeli shelling as life came to a standstill following an exchange of gunfire*, WAFA NEWS AGENCY (Oct. 7, 2023), <https://english.wafa.ps/Pages/Details/137958>.

¹⁴ *Journalist killed in an Israeli attack on Gaza*, WAFA NEWS AGENCY (Oct. 7, 2023), <https://english.wafa.ps/Pages/Details/137963>

¹⁵ *Minister of Health declares a state of emergency in all hospitals*, WAFA NEWS AGENCY (Oct. 7, 2023), <https://english.wafa.ps/Pages/Details/137965>

¹⁶ *Death toll of Israeli aggression on Gaza rises to 198, 1,610 injured*, WAFA NEWS AGENCY (Oct. 7, 2023), <https://english.wafa.ps/Pages/Details/137978>

- “Foreign Ministry says ending Israeli occupation only guarantee for peace, security and stability in the region[.]”¹⁷

29. The propaganda campaign only escalated in the following months. A sampling follows below.

- **November 24, 2023:** Defendants claim that “Israeli genocide” had been ongoing for 48 days.¹⁸
- **November 28, 2024:** Defendants published an article entitled, “US activist cal for Black Friday boycott to demand gov to stop sending arms to Israel[.]”¹⁹
- **December 3, 2024:** Defendants claim that “Israeli colonists prevent Palestinian from grazing his livestock in northern Jordan Valley.”²⁰
- **December 30, 2024:** Defendants publish article claiming Israel committed “systematic thefts in Palestinian homes[.]”²¹ Defendants further claim that Israel ordered “punitive demolition[s]” for Palestinian homes.²²
- **May 18, 2025:** Defendants published a letter entitled, “PNC: What is happening in Gaza is ethnic cleansing and genocide; international action needed[.]”²³
- **June 25, 2025:** Defendants parrot United Nations Relief and Works Agency (“UNRWA”) propaganda that “Israeli genocide” is ongoing.²⁴

¹⁷ *Foreign Ministry says ending Israeli occupation only guarantee for peace, security and stability in the region*, WAFA NEWS AGENCY (Oct. 7, 2023), <https://english.wafa.ps/Pages/Details/137973>

¹⁸ *4-Day humanitarian pause takes effect in Gaza after 48 days of Israeli genocide*, WAFA NEWS AGENCY (Nov. 24, 2023), <https://english.wafa.ps/Pages/Details/139536>.

¹⁹ *US activist call for Black Friday boycott to demand gov to stop sending arms to Israel*, WAFA NEWS AGENCY (Nov. 28, 2024), <https://english.wafa.ps/Pages/Details/152088>

²⁰ *Israeli colonists prevent Palestinian from grazing his livestock in northern Jordan Valley*, WAFA NEWS AGENCY (Dec. 6, 2024), <https://english.wafa.ps/Pages/Details/152329>

²¹ *Israel is committing systematic thefts in Palestinian homes in Gaza, says rights group*, WAFA NEWS AGENCY (Dec. 30, 2023), <https://english.wafa.ps/Pages/Details/140394>

²² *Punitive demolition orders issued for the family homes of three Palestinians killed last month*, WAFA NEWS AGENCY (Dec. 30, 2023), <https://english.wafa.ps/Pages/Details/140389>

²³ *PNC: What is happening in Gaza is ethnic cleansing and genocide; international action needed*, WAFA NEWS AGENCY (May 18, 2025), <https://english.wafa.ps/Pages/Details/157443>.

²⁴ *UNRWA Chief describes Gaza's situation as utterly horrific amid ongoing Israeli genocide*, WAFA NEWS AGENCY (June 25, 2025), <https://english.wafa.ps/Pages/Details/158715>.

- **August 28, 2025:** Defendants allege that Gaza Humanitarian Foundation engaged in the “enforced disappearance of starving Palestinian civilians seeking food aid[.]”²⁵
- **September 11, 2025:** Defendants published an article entitled, “Israeli occupation forces round up dozens of Palestinians in widespread raids across West Bank.”²⁶
- **September 26, 2025:** Defendants claim that Palestinian civilians were murdered as part of an ongoing “genocide” writing, “Israel’s genocidal onslaught continues undeterred. . . [.]”²⁷
- **September 28, 2025:** Defendants published an article on their website’s section entitled “Prisoners,” entitled “Prisoners’ institutions: Knesset’s approval of death penalty law a further step to entrench occupation’s crime against prisoners[.]”²⁸
- **October 1, 2025:** Defendants published a press release on their website titled, “President Abbas commends Qatar for remarks in support of Palestinian rights[.]”²⁹

30. Defendants have clearly directed these propagandized communications towards an English-speaking audience.

31. In summary, Defendants conducted a litany of activities while physically present in the United States, subjecting themselves to jurisdiction pursuant to 18 U.S.C. § 2334(e)(1)(B)(iii).

32. This District is the proper venue for this action pursuant to 18 U.S.C. § 2334(a) since Defendants PA and PLO maintain an office and agent and are residents of this District.

²⁵ *UN experts alarmed by reports of enforced disappearances at Gaza Humanitarian Foundation aid distribution sites*, Wafa News Agency (Aug. 28, 2025), <https://english.wafa.ps/Pages/Details/160761>.

²⁶ *Israeli forces detain 15 Palestinians in widespread raids across West Bank*, Wafa News Agency (Sept. 11, 2025), <https://english.wafa.ps/Pages/Details/161317>.

²⁷ *PNC: What is happening in Gaza is ethnic cleansing and genocide; international action needed*, Wafa News Agency (May 18, 2025), <https://english.wafa.ps/Pages/Details/157443>.

²⁸ *Prisoners’ institutions: Knesset’s approval of death penalty law a further step to entrench occupation’s crime against prisoners*, Wafa News Agency (Sept. 28, 2025), <https://english.wafa.ps/Pages/Details/161796>.

²⁹ *President Abbas commends Qatar for remarks in support of Palestinian rights*, Wafa News Agency (Oct. 1, 2025), <https://english.wafa.ps/Pages/Details/161955>.

STATEMENT OF FACTS

33. Since their founding, Defendants have represented the Palestinian people and shaped their culture and society. During this extended period, Defendants PLO and PA have openly celebrated and rewarded acts of terrorism against civilians in Israel. Defendants glorify those who die while committing terrorist attacks against Israel—labeling them *shahids* (i.e., martyrs)—and celebrate imprisoned terrorists, singling them out for special treatment, benefits, and tribute. Years of incitement to hate and murder, glorifying murderers, and celebrating terror attacks by the Defendants, together with Defendants’ perverse terror reward system, serve as the predicate for this suit.

A. The Founding of the PLO and PA and their Early Terrorist Strategies

34. Established in 1964 in Cairo, Egypt, during the Arab League Summit, Defendant PLO’s founding manifesto called for the annihilation of Israel.

35. Following the PLO’s founding, several terrorist factions emerged under the PLO’s umbrella, including the Popular Front for the Liberation of Palestine (“PFLP”); the Democratic Front for the Liberation of Palestine; the Popular Front for the Liberation of Palestine - General Command; and Fatah, a terror group from the early 1960s that would eventually dominate Palestinian leadership in the years to come.

36. In the late 1960s, the PLO began orchestrating terrorist attacks against Israeli civilians as part of its larger effort to “uproot the Zionist entity,” committing hundreds of attacks in just a few short years. This was the beginning of a longstanding pattern, described in more detail below, which normalized terrorism against Jews and visitors to Israel. This normalization of violence to achieve a political objective has emboldened would-be terrorists and laid the

groundwork for the circumstances that led to the murders of Taylor Force and Tzeela and Ravid Gez and the injuries to Plaintiff Gez.

37. The PLO initially focused its efforts on airplane hijackings. In 1968, three PFLP terrorists hijacked an El Al flight flying from Rome to Tel Aviv. The flight was diverted to Algiers, where a large portion of the flight's passengers were held hostage for forty days by the hijackers until a negotiation was reached for the hostages' release.

38. In February 1970, PLO terrorists detonated a bomb on a Swissair flight from Zurich to Hong Kong, killing all forty-seven passengers and crew.

39. In September 1970, PFLP terrorists orchestrated a series of hijackings over several days, seizing a total of five planes and holding over 300 hostages.

40. Two years later, four PLO terrorists hijacked a Sabena airlines flight from Brussels to Tel Aviv. The 90 passengers aboard were rescued after Israeli special forces entered the plane disguised as technicians.

41. That same year, members of the group Black September, a wing of Fatah, murdered eleven Israeli athletes at the 1972 Munich Olympics.

42. The PLO also carried out terrorist attacks in Cyprus, Switzerland, Greece, and Paraguay throughout the 1970s.

43. Six years after the Munich Olympics, Fatah terrorists carried out the Coast Road Massacre, which was the most lethal attack in Israel's history prior to October 7, 2023. Palestinian terrorists hijacked a bus, murdering 37 people of whom 12 were children, and wounding 70 people.

44. In 1985, members of the PLO hijacked a cruise ship off the coast of Egypt named the "Achille Lauro." PLO terrorists took the passengers hostage, murdering a Jewish wheelchair-

bound American passenger named Leon Klinghoffer, shooting him and throwing him overboard. One of the terrorists later explained that they had explicitly sought to kill an American, choosing Klinghoffer because he was disabled and executing him would demonstrate to the world that they “had no pity for anyone.”

45. Although the PLO did not have a formal reward system for compensating its imprisoned terrorists (or the families of its martyrs) during this time period, it did provide payments to operatives on a regular basis.

46. Despite its robust terrorist activity throughout the 1970s, Arab leaders designated the PLO as the “sole legitimate representative of the Palestinian people” in 1974, and the United Nations (U.N.) awarded the PLO “observer status” for the purposes of U.N. proceedings that same year.

47. During this time period, Defendant PLO also settled upon its purported legal justification under international law for its terror. In 1974, the United Nations General Assembly (“UNGA”) passed Resolutions 3236 and 3246, recognizing “the right of the Palestinian people to regain its rights by all means,”³⁰ including “armed struggle.”³¹ UNGA Resolutions 3236 and 3246 have been unabashedly misrepresented by Defendants as a license to kill. Both resolutions are cited as proof that international law grants Palestinians the right to murder any Israeli—soldiers, civilians, men, women, children, infants, and even foreign nationals in Israel, all in the name of Palestinian “resistance.” This message has been disseminated to Palestinian civilians *ad*

³⁰ G.A. Res. 3236 (XXIX), U.N. GAOR, 29th Sess., Supp. No. 31, at 106, U.N. Doc. A/RES/3236 (1974).

³¹ G.A. Res. 3246 (XXIV), U.N. GAOR, 24th Sess., Supp. No. 80, at 13, U.N. Doc. A/RES/3246 (1974).

nauseam.³²

48. In 1980, the PLO's Permanent Observer, acting in his official capacity, purchased a townhouse located at 115 East 65th Street, New York, NY, from which the PLO began its large-scale propaganda campaign in the United States, generating and disseminating promotional materials from its Manhattan office.

49. The international community's overtures did little to lessen the PLO's commitment to unbridled violence. For example, the First Intifada was a wave of Palestinian violence and terror against Israelis that lasted from 1987 to 1993, during which approximately 200 Israelis were murdered. During the First Intifada, the PLO supplied Palestinians with Molotov cocktails, grenades, and other weapons, as well as informational materials instructing Palestinians when and where to attack Israelis. In fact, Defendant PA's official news agency WAFA bragged that the First Intifada was directed by the PLO under the auspices of PLO leader Abu Jihad:

The first stage of the Intifada took place upon escalation of two unrelated incidents in the Gaza Strip. . . Within weeks, the PLO became the de factor director of the uprising, which lasted until 1991. Al-Wazir [Abu Jihad] had been assigned by Arafat the responsibility of the territories within the PLO command. . . Abu Jihad provided the uprising with financial backing and logistical support, thus becoming its "brain in exile". He reportedly activated every cell he had set up in the territories since the late 1970s.³³

³² Just this month, Israel released 250 Palestinian terrorists, many serving life sentences for murder, to have Hamas free 20 Israeli hostages, kidnapped and being tortured in Hamas tunnels for 2 years. Defendant PA's response was to post three tweets in its official X account demanding the release of 10,000 additional Palestinian prisoners jailed in Israel for terror offenses. The PA lamented that "still more than 10,000 captives are unlawfully held by Israel," followed by "Israel still unlawfully holds over 10,000 Palestinian captives," followed by "over 10,000 remain unlawfully held captive." The PA teaches its people that Israel's arrest of terrorist murderers like Abdullah Barghouti, mass murderer of 67 cited above, is "unlawful," because Palestinian killing of Israeli civilians like Tzeela Gez, and foreign nationals in Israel like Taylor Force, constitute lawful "resistance."

³³ *Remembering Abu Jihad, the PLO mastermind, on his 35th anniversary*, WAFA NEWS

B. The Oslo Accords and the PLO's Prompt Establishment of Pay for Slay

50. At the close of the First Intifada in 1993, and under the weight of international pressure, the PLO and Israel began a peace process that would culminate in the Oslo Accords. Subject to this agreement, Israel arranged to transfer portions of Gaza and part of the West Bank (formally known as “Judea and Samaria”) to Palestinian control.

51. To administer civil matters and internal security in the new Palestinian territories, the Oslo Accords established the PA.

52. Since the execution of the Oslo Accords, the PLO has been regarded as the international representative of the Palestinian people, while the PA has been regarded as the governing body of the Palestinian areas of the West Bank. Both the PA and the PLO are currently controlled by Palestinian leader Mahmoud Abbas.

53. A little more than a decade after concluding the Oslo Accords and reframing themselves as “peace partners” with Israel, Defendants transformed their previously informal system for paying imprisoned Palestinian terrorists and the families of deceased Palestinian terrorists, whom Defendants refer to as “martyrs,” into a staple of Palestinian society.

54. Defendants’ institutional mechanism for paying imprisoned Palestinian terrorists was codified in 2004, while payments to “martyrs” were formalized following the Second Intifada (from 2000 to 2004) as the result of the large number of terrorists who were killed while committing terror attacks.

AGENCY (April 16, 2023), <https://english.wafa.ps/Pages/Details/135381>.

55. Referred to collectively as “Pay for Slay” by many in the United States, this payment system developed by Defendants provides imprisoned terrorists, injured terrorists, and the families of dead terrorists with an elaborate schedule of salaries, stipends, rewards, and benefits, including employment, free health care, free legal representation, and free tuition. Pay for Slay is not a form of welfare, as the salaries, stipends, rewards, and benefits are not provided on a needs-basis. Indeed, the laws governing the system explicitly demand that Defendants pay salaries and benefits to all prisoners, regardless of need, and that payments should be provided regardless of the terrorist’s individual affiliation with particular groups or sects. Namely, whether an individual terrorist is a member of Hamas, Palestinian Islamic Jihad (“PIJ”), Fatah, PFLP, or any other group is of no moments to Defendants. So long as the Palestinian terrorist has been recognized as a prisoner or a martyr, the terrorist or his or her family will receive payments under Defendants’ policy.

56. The Second Intifada, which lasted from 2000 until 2004, compelled Defendants to formalize their payment system to terrorists. Over the course of the Second Intifada, Palestinian terrorists, many in organizations under the control of the PA, Fatah, and the PLO, conducted more than 100 suicide bombings, murdering over 1,000 Israelis and dozens of international citizens. Formalization of

57. While Pay for Slay is commonly used to refer collectively to the entire system of rewarding terrorists that “resists the occupation” defined as Israel, prisoners and martyr families are subject to different rewards systems under the control and discretion of Defendants. Each reward system is described herein.

i. **Defendants' Payments Reward Palestinians Imprisoned for Terrorism**

58. Those who are imprisoned for committing acts of terror against Israel are routinely hailed as national heroes by Defendants PLO and PA. To that point, Abbas just announced earlier this year, “Even if we have [only] one penny left, it is for the prisoners and Martyrs. I will not agree, and you will not agree, to reduce any obligation, any interest, or any penny given to them. They must receive everything, as it was in the past, and they are more precious than all of us!”

59. There are thousands of Palestinian prisoners serving sentences in Israel for terrorism-related offenses, otherwise known as “security prisoners.” As of the filing of this complaint, there are reportedly around 11,000 Palestinian security prisoners serving sentences or awaiting trial in Israel for acts related to terrorism against Israel.

60. The system of payments was first formalized in 1998 when PLO leader Yasser Arafat established the “Ministry of Prisoners Affairs” as an arm of the PA’s government strictly devoted to supporting Palestinian terrorists imprisoned in Israel.

61. Upon Arafat’s 1994 death, his successor, Abbas, further cemented and expanded the Ministry of Prisoners Affairs as an integral component of Palestinian governance. Specifically, Abbas, as Chairman of the PLO and President of the PA, oversaw the passage of a constellation of laws that outlined the specific rewards and benefits available to terrorists (and their families), whether imprisoned or released.

62. Law No. 14 (2004) on Aid for Prisoners in Israeli Prisons (“Law No. 14”) defines the prisoners eligible for reward as “anyone incarcerated in the occupation’s prisons for his participation in the struggle against the occupation,” meaning anyone who has engaged

in terrorism against Israel and been arrested for such. Amended Palestinian Prisoners Law, 2004/19, art. 1 (2004) (Palestinian Authority).

63. American society praises those who have vindicated civil rights and brought peace. In contrast, Amended Palestinian Prisoners Law No. 19 (2004) (“Law No. 19”) valorizes both imprisoned and released terrorists as “a fighting sector and an integral part of the fabric of the Arab Palestinian society.” Amended Palestinian Prisoners Law, 2004/19, art. 2 (2004) (Palestinian Authority). Law No. 19 “grant[s] every incarcerated prisoner [imprisoned for terrorism] a monthly salary, without discrimination,” as well as a clothing allowance to be distributed twice annually. *Id.* at art. 6. The PA law differentiates typical criminal prisoners from terrorist prisoners by assigning the latter a special Arabic word—*Asra*—which is equivalent to calling the terrorist prisoners “POWs.” *Asra* is used by the PA to emphasize its claim that Palestinian terrorists are actually legitimate soldiers because the UN gave them the right to kill. The PA uses a different word for criminal prisoners, such as car thieves, who receive no benefits.

64. Critically, the monthly salary awarded under Law No. 19 is based upon the length of time the terrorist has served in prison thus far, with the amount increasing in steady increments. This arrangement ensures that the terrorists who murder Jews, Israelis, Americans, or all three (and spend the longest time in prison) receive the largest salaries. *See* Government Decision No. 23 (2010) (Palestinian Authority). Law No. 19 also stipulates that the monthly salary to the prisoner is to be linked to a cost-of-living index to ensure that the salary is in pace with inflation.

65. Over the last several decades, control over the payment system has volleyed between the PA and the PLO, both of which are headed by Abbas. While the PA Ministry of

Prisoners Affairs oversaw the system for ten years, in 2014, the PLO and the PA created the Commission of Prisoners' Affairs, described herein, and transferred the functions of the Ministry of Prisoners Affairs to the PLO Commission. The PA also transferred the money to the PLO to fund the terrorists' salaries.

66. The move was a brief sleight-of-hand to appease donor countries concerned by the PA's funding of terrorism, which the PA openly admitted.³⁴ Abbas even appointed the same minister who formerly oversaw the payment of prisoners' salaries under the Ministry of Prisoners' Affairs to serve in the same capacity, only now as head of the new PLO Commission. In 2018, the PA moved the terror reward payments back to the Ministry of Prisoners' Affairs, paid the salaries directly, and closed the Commission. The PA's direct

³⁴ In August 2014, the newly-appointed head of the Commission of Prisoners' Affairs Issa Karake confirmed that the shift to the PLO was merely cosmetic to appease the donor countries:

The Palestinian leadership, President Mahmoud Abbas and the members of the [PLO's] Executive Committee confirmed that this change would in no way affect the importance and significance of the prisoners' issue, neither in terms of politics and the struggle nor in terms of the services [to the prisoners]. There was [international] pressure [because of the salaries to terrorists] and a kind of war, an intense war, and monetary and financial threats towards the PA.

Ajyal radio (independent Palestinian station), Aug. 30, 2014. The PA Government Spokesman explained that this change was to make donor countries think they were no longer paying to prisoners:

[The change] will provide political and legal cover for this issue. It eliminates the many arguments made by many parties, who always try to say that [foreign] aid money [to the PA] is going to the prisoners.

Official PA TV, June 5, 2014. Moreover, the official PA daily reported that the new "Commission" will be subordinate to the PLO and supervised by it and by the Palestinian presidency." *Al-Hayat Al-Jadida*, Sept. 3, 2014.

payments were short-lived—in 2020, the responsibility for paying imprisoned terrorists once again shifted back to the PLO.

67. In February 2025, the PA announced a new system to oversee payments to prisoners and martyrs' families, which would operate under the Palestinian National Economic Empowerment Institution ("PNEEI"). PNEEI announced that it began to take oversight only in September 2025.

68. Regardless of whether the payments came from the PA or the PLO, at all relevant times, the payment system to imprisoned terrorists has always been controlled and operated by Defendants PLO and PA, always under the direction of PA and PLO leader Mahmoud Abbas and always funded by Defendant PA.

ii. Pay for Slay Payments Are a Direct Incentive for Terror

69. As of the filing of this Complaint, Defendants pay each terrorist increasing amounts based on the length of time of the imprisonment, as is explicitly written in PA law. Specifically, Defendants pay out salaries on the following schedule that either meet or exceed the average monthly salary in the West Bank:

- 1,400 shekels per month (about \$417 USD) for the first three years in prison;
- 2,000 shekels per month (about \$596 USD) for the next two years;
- 4,000 shekels per month (about \$1,119 USD) between years six and ten;
- 7,000 shekels per month (about \$2088 USD) between years 11 and 15;
- 8,000 shekels per month (about \$2386 USD) between years 16 and 20;
- 10,000 shekels per month (about \$2983 USD) between years 25 and 30;
- and finally, 12,000 shekels per month (about \$3580 USD), should imprisonment exceed 30 years.

70. The average monthly salary in the West Bank is roughly 1,430 shekels (\$430 USD).³⁵ This system of payments therefore creates a strong incentive structure for Palestinians to engage in terrorism—with the promise of a government salary in exchange for murderous acts of violence, guaranteeing security for them and their family should they be killed, injured, or arrested. The term “salary” is used in Palestinian law to indicate that the income was earned and is not a form of social welfare.

71. The words of the Palestinian terrorists themselves best demonstrate this phenomenon. For example, terrorist Khaled Rajoub, whose terror attack in 2014 was thwarted by Israeli security forces, later explained to Israeli security forces why he tried to murder Israelis:

I am a man with a family of seven, including me and my wife. I don't work, and I've accumulated large debts and am unable to pay them off. I reached a point where, if my son wants a shekel, I have nothing to give him. Therefore, I decided to die—it didn't matter how, by hanging, any way, to die. I thought about it and said to myself that if I die by hanging, or any other way, I won't get anything out of it, so I decided to do something serious, such as committing murder, something in which I will both kill and get killed, and then my family will get money [from the PA] and will live comfortably. In other words, something will come out of my death.³⁶

72. In addition to these payments to imprisoned terrorists, Defendants pay bounties to their families in the amount of 300 shekels per month for each wife and 50 shekels per month

³⁵ Nurit Yohanan, *Barred from working in Israel, West Bank Palestinians pay a price for Gaza's war*, TIMES OF ISRAEL (July 19, 2025), [https://www.timesofisrael.com/barred-from-working-in-israel-west-bank-palestinians-pay-a-price-for-gazas-war/#:~:text=The%20average%20monthly%20salary%20in,\\$%2C380\)%20or%20more%20per%20month](https://www.timesofisrael.com/barred-from-working-in-israel-west-bank-palestinians-pay-a-price-for-gazas-war/#:~:text=The%20average%20monthly%20salary%20in,$%2C380)%20or%20more%20per%20month).

³⁶ Itamar Marcus & Nan Jacques Zilberdik, *Interrogation of Palestinian terrorist proves: Palestinian Authority payments motivate terror*, PALESTINIAN MEDIA WATCH (July 10, 2017), <https://palwatch.org/page/12604>.

per child. Payments to family members are increased should the family members live in Jerusalem (an additional 300 shekels per month) or any other part of Israel (an additional 500 shekels per month) demonstrating that Defendants calibrate their payments to incentivize particular types of terrorist attacks. In other words, Defendants (despite ostensibly only being the government of Palestinians in Gaza and portions of the West Bank), deliberately create an incentive structure that encourages Israeli Arabs, who do not have to pass through security checkpoints, to commit acts of terror against Israelis, Jews, and visitors to Israel.³⁷

73. Those working for the Palestinian government, if compelled to avail themselves of the handsome rewards system, need not worry about prison time affecting their future salary. If a terrorist was employed by the PA or PLO at the time of the relevant act of terror, such terrorist's time in prison will count towards his civil service tenure for the purposes of calculating pay and benefits. Furthermore, "the National Authority shall pay [such terrorist's] social security and pension fees to the social security and pension fund for the years he spent in prison." *Id.* at art. 8.

74. In 2013, Law No. 19 was amended to further bolster Defendants' support for Palestinian terrorism by providing yet another set of incentives. *See* Decree Law No. 1 on the Amendment of the Prisoners and Released Prisoners Law No. 19 (2004), 2013/1 (Palestinian Authority) ("Decree Law No. 1"). Among its provisions, Decree Law No. 1 does the following, *inter alia*:

- Guarantees employment to prisoners upon release and, in particular, employment with the PA and PLO,

³⁷ A formal system of security checkpoints in Israel emerged following the First Intifada. It was expanded in response to the obscene violence of the Second Intifada. These checkpoints are positioned in Israel along the border of the Palestinian-controlled portions of the West Bank and Gaza.

should the male prisoner have served a decade in Israeli prison (and female, five years).

- Promises released prisoners will be given priority hiring in PLO and PA institutions.
- If the PLO and PA cannot provide employment, they guarantee a monthly salary to every released prisoner who spent five to 10 years in prison.
- Promises to “provide for ... [the] families” of released prisoners.
- Guarantees a large release grant to any prisoner who served one year or more.

75. Article 6 of Decree Law No. 1 exempts released prisoners who served one year or more from having to pay tuition fees at Palestinian universities or any professional training programs. It also promises released prisoners free health insurance.

76. Because of Defendants’ perverse and heinous system of allocating funds which would otherwise be used to support Palestinian civil society to reward terror, Palestinians who might not otherwise seek to kill Jews know that they can best provide for their families by doing so.

iii. Pay for Slay Payments Reward Palestinian “Martyrs”

77. In addition to rewarding Palestinian security prisoners and their families—both during imprisonment and long after release—Defendants pay stipends to the families of Palestinian terrorists who are killed during the commission of a terrorist attack. Defendants reward these individuals, which include suicide bombers who murdered civilians, elevating these individuals to a supreme religious status of “martyrs,” meaning individuals who died for Allah.³⁸

³⁸ PA Minister of Religious Affairs, Mahmoud Al-Habbash, stated the following:

After prophecy and righteousness there is no status Allah exalted more than Martyrdom... They went smiling to their deaths... The martyr has merit with Allah, a merit that no one else has...

78. Those who are injured in the commission of a terrorist attack, but not killed, also receive similar payments, depending upon the severity of the disability incurred by the terrorist. For instance, the payment to the wounded terrorist is a percentage of the allowance traditionally paid to “martyr” families based on the degree of the incurred disability: a wounded terrorist with 75% disability or more will receive a full allowance; a wounded terrorist with 50 to 74% disability will receive 75% of the allowance; and a wounded terrorist with 40 to 49% disability will receive 50% of the allowance.³⁹

79. Even though the PA did not create a statutory payment scheme for martyr families as it did for Palestinian security prisoners, Defendants’ policy of awarding Palestinian martyrs is accepted and well-publicized. This policy is also heavily prioritized by Defendants. In fact, even when the PA did not have enough money to pay its employees their full salaries last year, Muhammad Hamida, the Economy Ministry Director in Bethlehem, explained that both the prisoners’ and the martyrs’ families still received their full salaries:

While we as [PA] employees received a salary at a rate of 50%, before the [Gaza] war, the families of the prisoners and martyrs received a full salary. The Palestinian leadership remains committed to this. It deducted amounts from regular employees and gave a full salary to the families of the prisoners and martyrs. . . No one in Palestine complains about why the families of the prisoners and the martyrs get a full salary and we get half. Official PA TV, July 16, 2024.

‘The martyr- his sins are forgiven with the first gush of his blood from his wound... ‘The martyr advocates on behalf of 70 members of his family, and saves them all from hell. The martyr lives together with the prophets and the righteous ones. Official PA TV, Nov. 8, 2013.

³⁹ Maurice Hirsch, Adv., Itamar Marcus & Nan Jacques Zilberdik, *PMW Special Report: Israel must implement 2nd half of anti- “Pay-for-Slay” law before the end of 2019*, PALESTINIAN MEDIA WATCH (Nov. 18, 2019), <https://palwatch.org/page/16842>.

80. The Institution for Families of the Martyrs and the Injured (the “Institution”), which is overseen by Defendant PA, disburses payments to injured terrorists, as well as to the families of terrorists killed during the commission of a terror attack.

81. Founded by Fatah in 1965, the Institution was declared an official organ of the PLO in 1971. In 1994, it was absorbed into the PA’s Ministry of Social Affairs. In 2005, Abbas transferred the Institution back to the PLO, where it currently sits. Despite being housed in the PLO, the Institution is funded by the PA’s Ministry of Finance.

82. The Institution is careful to ensure that its funds are used *only* for terrorism-related deaths. For each martyr, the Institution ensures that the martyrdom is legitimate—that is, that the individual in question was not engaged in ordinary street crime, but was killed or injured committing an act of terror or killed or injured accidentally during a counter-terrorism operation. A Social Examination Form, detailing information about the martyr in question, the date, the place, and the circumstances of his death, as well as proof of death, is completed before any determination is made.

83. As of the filing of this Complaint, Palestinian martyrs’ families are eligible to receive a one-time immediate grant of 6,000 shekels following the martyr’s death in a terrorist attack against Israel, followed by a monthly stipend of 1,400 shekels per month. The injured receive monthly grants between 700 shekels and 1,400 shekels per month, based on the degree of the disability.

iv. **Disbursing Payments to Prisoners and “Martyrs”**

84. While payments to new “martyrs” or their families are not always immediate, Defendants do the utmost to ensure that terror salaries and stipends are paid as soon as possible.⁴⁰

85. Prior to 2021, various Palestinian banks across the West Bank disbursed Pay for Slay payments to recipient. As described below, amendments to Israel’s Anti-Terror Law effectively cabined the banks’ abilities to disperse these payments.

86. In May 2020, the Head of the Israeli Defense Forces (“IDF”) in Judea and Samaria signed the Order for Security Provisions (Amendment No. 67) (no. 1827), 5780-2020, which extended the application of Israel’s Anti-Terror Law to the West Bank, including the portions under Palestinian control. The legislation provides that any person who conducts any transaction with assets, including money, in order to facilitate, further, fund, or reward an individual for committing an act of terror, commits an offense punishable by up to ten years in prison, along with a significant fine.

87. The month before the law went into effect, Israeli non-governmental organization Palestinian Media Watch (“PMW”) sent a letter to various bank officials throughout the West Bank warning them of the law’s contents and its potential impact on the bank’s operations:

If your bank has any accounts if imprisoned terrorists—whether in the names of terrorists themselves or whether in the names of proxies appointed by the terrorists—you must order the immediate freeze of those accounts and the transfer of their contents to the IDF Military Commander of Judea and Samaria.

We would further note, that since these payments are a reward for acts of terror, if the bank continues to be a

⁴⁰ For instance, following the October 7 terror attacks, the PA was so eager to begin rewarding newly arrested terrorists—the number of eligible Palestinian security prisoners having increased by over 60%—it announced in February 2024 that it would be bypassing its own regulations through April 2024 to allow for the prisoner’s salary to commence without documentation from the Red Cross, which was previously a prerequisite to receiving payments.

partner in the crime and with the prohibited policy of the Palestinian Authority, the bank is likely to be considered as a body that gave material support to terror, with all of the implications of such, including civil suits to compensate the victims of acts of terror.

88. In order to avoid incurring both criminal and civil liability for disbursing Pay for Slay payments, Palestinian banks operating in the West Bank closed 35,000 bank accounts belonging to prisoners, the injured, and “martyrs” families.

89. In response to Israel’s effective shutdown of the Palestinian banks’ role in processing Pay for Slay transactions, in April 2021, Defendant PA installed ATMs in Palestinian post offices for the sole purpose of disbursing payments to the imprisoned terrorists, the injured, and martyrs’ families. Post office ATMs operated by the PA throughout the West Bank are designated for the purpose of exclusively paying terrorists:

Our people, families of the Martyrs and injured in the West Bank... on the subject of the payment of allowances for the families of Martyrs and injured. . .We call on the recipients of the funds to withdraw the large amounts that have accumulated for them at the post office, including the current allowance. . .***As we have emphasized before, the post office is not a regular bank like other banks and cannot hold funds, but is only a means of transferring allowances, and the funds cannot be held for a long period in the accounts of the recipients.*** . . We wish mercy for the souls of the martyrs, recovery for the wounded, and freedom for the prisoners.

90. Reports of the new arrangement spread through Arab media:

- The Commission of Prisoners’ Affairs said in a statement it issued today, Monday, that the salaries of the prisoners and released prisoners will be paid tomorrow, Tuesday, through the Palestinian post office branches in all districts of the West Bank, and through the commission’s departments in the Gaza Strip. *Ma’an*, independent Palestinian news agency, April 5, 2021.

- Today, Tuesday, the PA began to pay the salaries of the prisoners in the Israeli occupation's prison, the released prisoners, the wounded, and the Martyrs' relatives through the Palestinian post office branches. This was after approximately 35,000 of their accounts were closed at the banks operating in the Palestinian territories following an Israeli military order. *Al-Araby Al-Jadeed*, UK Arab news website, April 6, 2021.
- The decision to pay the prisoners' salaries through the post office branches was made following a meeting held between the [PA] Ministry of Finance, the [PA] Ministry of Communications and IT, and the Palestinian [PA] Monetary Authority. This was after the banks refused to accept the salary sheets of the prisoners and released prisoners due to the Israeli threats to harm and sue them. *Ma'an*, independent Palestinian news agency, April 5, 2021.

91. Therefore, since 2021, payments to prisoners, martyrs, and their families have been disbursed by the PA and through PA-controlled post offices, which operate as “authorized payment centers.” Put another way, in order to *aid and abet* the commission of terrorist acts against Israelis, Jews, and foreigners visiting Israel, Defendants reformed their payment systems to sidestep Israeli efforts to curb Defendants’ “Pay for Slay” practices.

v. **Despite Their Statements to the Contrary, Defendants Continue Pay for Slay**

92. As international pressure, particularly from donors, mounted against Defendants to halt Pay for Slay, Defendants announced in February 2025 that they would be ending the program and cancelling the laws, orders, regulations, and programs governing Pay for Slay.

93. Upon information and belief, the Pay for Slay system remained active until at least September 2025 and at all times relevant for the purposes of this Complaint.

94. As a threshold matter, Abbas’s announcement concerning the end of Pay for Slay was immediately contradicted by Mahmoud Abbas himself. In February 2025, Abbas assured the Palestinian public (in Arabic) that his proposal was not sincere: “I told you once, and I stand by my word: Even if we have [only] one penny left, it is for the prisoners and martyrs. . . They must receive everything, *as it was in the past*, and they are more precious than all of us!” (emphasis added).

95. To that point, Abbas instructed an PA economic entity, the Palestinian National Economic Empowerment Institution (“PNEEI”), to oversee payments to prisoners and martyrs’ families, as part of all PA social welfare payments. PNEEI is managed by a board of trustees appointed by Abbas. Ten of the 11 board members of PNEEI are employed in senior government positions within the PA, including one minister and 6 undersecretaries. Of course, the PNEEI ultimately answers to Abbas, as the head of Defendants PA and PLO.

96. In May 2025, the Director of the Commission of Prisoners’ Affairs confirmed that the Commission had sent the list of eligible prisoners to the Ministry of Finance for the purposes of disbursing salaries “as regularly happens every month,” though the list contained fewer names than months prior.⁴¹ Still, at the time of Tzeela and Ravid Gez’s murder, Pay for Slay was still active.

97. Furthermore, as reported in Palestinian media, as of August 2025, Pay for Slay payments were still being disbursed to Palestinian security prisoners and martyrs. Below are

⁴¹ *Updates on the Palestinian Authority's new procedures to pay terrorists*, PALESTINIAN MEDIA WATCH (May 2025), <https://palwatch.org/page/37153>.

excerpts from Palestinian news media reporting on the payments and the way in which they were disbursed.⁴²

- Transfers of salaries for prisoners and families of Martyrs and the wounded via the ATMs of the Palestinian Postal Bank - today, Sunday 3/8/2025. Radio Al-Zaytouna 91.6, Salfit, Telegram channel, Aug. 3, 2025.
- Please note: Salaries for the wounded, prisoners, and Martyrs can be withdrawn from the Palestinian Postal Bank. Free Jenin, Telegram channel, Aug. 5, 2025.
- Please note: Salaries for the wounded, prisoners, and Martyrs can be withdrawn from the Palestinian Postal Bank. Green Jenin, Telegram channel, Hamas-associated channel, Aug. 5, 2025.

98. Had any payments under Pay for Slay been halted following Abbas's January 2025 announcement, Palestinian media would have covered the reduction in such payments, as is customary. For instance, when the Commission received a smaller list of eligible prisoners than usual from the Ministry of Finance in May 2025, *it was immediately reported*.

99. Moreover, Defendants continue to prioritize making Pay for Slay payments, even if delayed, and even if doing so requires salary cuts to PA government employees. In fact, due to a serious financial crisis, PA Government employees have been receiving only partial salaries since 2019. According to financial reports from 2023, the PA cut the salaries of its nearly 145,000 employees by 30% to 50% due to budget deficits. And even those partial salaries are disbursed two months late (for example, civil servant salaries from May were just disbursed in August).

⁴² Itamar Marcus, *Palestinian Authority continues to pay salaries to terrorists*, PALESTINIAN MEDIA WATCH (Sept. 2, 2025), <https://palwatch.org/page/41458>.

100. Yet, Defendants have continued to recognize thousands of new prisoners as a result of their participation in the October 7 terror attacks and the ensuing confrontations, who under PA law are all eligible for payment.⁴³ As described above, Hamas-affiliates are eligible for Pay for Slay payments because Defendants do not discriminate based on a terrorist's affiliation.

101. The PNEEI announced it would begin processing the payment of salaries and stipends through the PA's Social Protection and Care Program at "authorized payment centers," on or around September 11, 2025. However, recent reporting reveals that PA post offices continue to be the "authorized payment centers," which are exclusively used for disbursing payments under the Pay for Slay system and have not changed under the PNEEI's administration of payments to terrorists.

102. Still, even if the establishment of PNEEI were to mean a winding down of Pay for Slay, at all times relevant to this Complaint, the Pay for Slay system was active, and Palestinian prisoners, as well as "martyr" families, were continuing to receive payment.⁴⁴

103. At all relevant times, as Chairman of the PLO and President of the PA, Abbas oversaw the payments at issue here, whether they were disbursed by the PA, the PLO, or another entity.

⁴³ Neomi Neumann, *West Bank Economics Are Key to Stabilizing the Palestinian Authority—or Forcing Its Collapse*, WASH. INST. FOR NEAR E. POL. (May 31, 2024), <https://www.washingtoninstitute.org/policy-analysis/west-bank-economics-are-key-stabilizing-palestinian-authority-or-forcing-its>.

⁴⁴ On the week of the filing of this Complaint, Defendant PA announced that the forms for the new "social service" payment system must be submitted by November 10, 2025, confirming yet again that even through November, the Pay for Slay system remains in place.

C. Defendants Encouraged and Rewarded the Terrorist Murder of Plaintiffs

104. For years, Defendants have consistently encouraged and/or incentivized the Palestinian population to engage in acts of terror against Israelis and anyone possibly visiting the country, using various euphemisms, such as “resistance,” “armed resistance,” “popular resistance,” “popular uprising,” “peaceful uprising,” “peaceful resistance,” “intifada,” “Day[s] of Rage,” and “violent confrontation,” especially when it was deemed politically advantageous.

105. In 2015, for example, Palestinians undertook what became known as the “knife intifada” or “stabbing intifada” or “Jerusalem intifada”—murdering Israeli civilians primarily through stabbing attacks. After Palestinian terrorists had already murdered 14 Israelis and wounded 167 in 65 stabbings and eight shootings, PA President Mahmoud Abbas announced on official PA TV: “We said to everyone that we want peaceful popular uprising, and that’s what this is. That’s what this is.” Official PA TV, Nov. 16, 2015. As Defendant PA informs its own people, murdering innocent civilians can be a “peaceful, popular uprising.”

106. Hundreds of U.S. citizens have been killed or injured in terror attacks in Israel. *Linde v. Arab Bank, PLC*, 882 F.3d 314, 317 (2d Cir. 2018).

107. Hundreds of Palestinian terrorists have been or are imprisoned in Israel for killing or injuring a U.S. citizen. All are eligible for payment under Pay for Slay.

108. Dozens of Palestinian terrorists have died while committing terror attacks that killed or injured a U.S. citizen. All are eligible for payment under Pay for Slay.

109. At all relevant times, Defendants encouraged and incentivized terrorism through their Pay for Slay system, which regularly provides imprisoned terrorists and dead

terrorists' families with generous sums of money and numerous benefits as a result of their commission of terrorist acts.

i. Defendants Glorify the Extermination of the Jewish People

110. What sustains Defendants' Pay for Slay system is their glorification of killing Jews, which has become central to Palestinian society.⁴⁵

111. Defendant PA publicly denies thousands of years of Jewish history in the Land of Israel, falsely alleging that Jews did not live there and would never have thought to settle there until Western colonialist forces "planted" them in "Palestine."⁴⁶

112. In that vein, Defendant PA espouses that the entirety of Israel is on holy waqf land and that, under Islam, every Muslim has a personal religious responsibility to seek the liberation of the entire Islamic land of "Palestine," otherwise known as Israel.⁴⁷

113. Through its public programming, schooling, and governance, including Pay for Slay, the PA teaches Palestinians that achieving the status of "martyr" is the highest religious level that a Muslim can achieve, for it means that Allah personally chose that individual to die for him.⁴⁸

114. Defendants' state-run media dutifully disseminates their message of incitement, where PA leadership regularly appears to glorify martyrs and to declare the importance of martyrdom.

⁴⁵ See generally Itamar Marcus, *Report: Roadmap for Palestinian Authority reform – 10 essential and quantifiable steps*, PALESTINIAN MEDIA WATCH (Sept. 28, 2025), <https://palwatch.org/page/41546#roadmap>.

⁴⁶ *Id.* at 6.

⁴⁷ *Id.*

⁴⁸ *Id.* at 12.

115. Religious figures appearing on official PA TV have prayed for the extermination of Jews at least seven times in the last year, most recently on August 22, 2025. They prayed that Allah should count the Jews one by one, “kill them one by one, don't leave even one.”⁴⁹

116. Official PA TV features a variety of programs promoting hate and terror. For instance, a weekly program named “Giants of Endurance” honors Palestinian terrorists by featuring interviews with the family members of imprisoned and released terrorists. In addition, the PA broadcasts anniversary programs each year to celebrate the most horrific terror attacks, among them the Munich Olympics massacre, the Coastal Road massacre, and other terror attacks that led to the murder of hundreds of innocent Israeli civilians.⁵⁰

117. The PA has named schools, monuments, squares, streets, summer camps, sports facilities, children's events, courses, and countless other institutions in honor of Palestinian terrorists. The PA has named at least 31 schools alone after terrorist murderers.⁵¹

118. In that vein, Fatah's educational magazine for children, *Waed*, contains countless messages promoting the destruction of Israel:⁵²

- “[Israel] the evil occupation state. . .this artificial state. . .It is artificial because it is foreign. . .”
- “Read history well: There is no Israel.”
- “The liberation of Palestine will only be achieved through armed struggle.”
- “The Zionist invaders will go to the garbage can of history.”
- “Palestine will be liberated and purified from the occupation's (i.e., Israel's) defilement.”

⁴⁹ *Id.* at 4.

⁵⁰ *Id.* at 10.

⁵¹ *Id.* at 14.

⁵² *Id.* at 9.

- “Palestine is destined for full liberation (i.e., all of Israel. . . from the yoke of Zionist colonialism.”
- “At the end of the period of French colonialism. . . they all fled to France. . . Algeria’s experience assures that the Jewish settlers in Palestine will disappear in the end.”

119. Unsurprisingly, Palestinian children have absorbed this message of violence. Following the October 7 terror attacks, Palestinian schools held assemblies to celebrate the terror atrocities, and children’s speeches expressing euphoria were posted on the school’s social media. For example:⁵³

- PA schoolgirl: “That day went down in history. . . We woke up to the sounds of laughter. There are those among us who thought he was dreaming, but it is a beautiful dream that he never wants to wake up from. . . On Saturday [October 7], the people who resist returned to their land. . . It was impossible to express the emotions in our hearts, and we never imagined such pride in our people on our faces. The sense of honor that we felt is indescribable.”
- PA Schoolgirl: “Welcome, October, you are the month of blood” “October, month of blood, you have arrived, welcome. October, do not leave easily. October, teach them a lesson to be delivered by teachers of revenge; justice has witnesses. We came to you (i.e., Israel) in multitudes, Open your door, we are death. We will let you taste eternity in fire [of hell].”
- Girl reading text celebrating the October 7 terror attacks at a school assembly “Good morning, Gaza, a morning of victory, Gaza, a morning of glory and fame, a morning of heroic martyrs, a morning of child martyrs. Good morning, oh people of the Resistance (Hamas), as you play the anthem of victory with bullets and rifles. Good morning, O you who stand guard like lions in tunnels and trenches, Good morning, O men of heroism, O men of power.”

120. This message has been echoed by Defendants’ leader. Abbas, leader of both Defendants, has justified the Holocaust numerous times as a function of Jewish “social behavior,

⁵³ *Id.* at 15–16.

[charging] interest, and financial matters.”⁵⁴ His portrayal of the Holocaust represents nothing novel—Abbas himself published a book accusing the Zionist movement of being “fundamental collaborators” with Nazism and responsible for the Holocaust. In other words, in the mind of Abbas, Jews were responsible for the Holocaust.⁵⁵

ii. Defendants Elevate Their Drumbeat to Encourage Terrorism in the Weeks Leading to The Murder of Taylor Force

121. In the months leading to the March 2016 murder of American citizen and U.S. military veteran Taylor Force, Defendants escalated their hateful incitement to terror.

122. In September 2015, Abbas, leader of both Defendants, encouraged Palestinians to carry out acts of violence against their neighboring Jews, perpetuating the conspiracy theory that the Israeli Government would soon be denying Muslims access to Al-Aqsa Mosque (otherwise known as the Temple Mount in Judaism, but Jews are not permitted to pray there):

We bless you, we bless the Murabitin (i.e., those carrying out Ribat, religious conflict/war to protect land claimed to be Islamic), we bless every drop of blood that has been spilled for Jerusalem, which is clean and pure blood, blood spilled for Allah, Allah willing. Every Martyr (Shahid) will reach Paradise, and everyone wounded will be rewarded by Allah. The Al-Aqsa Mosque is ours, the Church of the Holy Sepulchre is ours, and they have no right to defile them with their filthy feet. We will not allow them to, and we will do everything in our power to protect Jerusalem.

⁵⁴ Letter dated 2 May 2018 from the Permanent Representative of Israel to the United Nations addressed to the President of the Security Council, U.N. Security Council, S/2018/413 (May 10, 2018), <https://docs.un.org/en/S/2018/413>.

⁵⁵ Edy Cohen, *How Holocaust Denial Shaped Mahmoud Abbas’ Worldview*, THE TOWER (May 2016), <http://www.thetower.org/article/how-holocaust-denial-shaped-mahmoud-abbas-worldview/>.

123. Abbas's comments are regarded as driving force behind the resurgence of Palestinian terror attacks that began in October 2015 and lasted throughout 2016, which researchers refer to this as the "knife intifada," the "stabbing intifada," or the "Jerusalem intifada."

124. Indeed, throughout this time period, leaders within the PLO, PA, and Fatah continued to call for violence, issue statements glorifying terrorists, share cartoons and poetry glorifying terrorism, and stress the importance of armed struggle. Below is a mere *sampling* of the incitement that occurred in the months leading to the March 2016 murder of Mr. Force (emphasis added in all quotes):

- On or around September 14, 2015, Rafaat Alayan, Fatah Spokesperson in Jerusalem, called on "all Palestinian bodies and national and Islamic factions in all regions of the homeland to enlist and go to the areas of conflict in order to explode in front of the occupier and its assistants because of its repeated actions and attacks against the Al-Aqsa [Mosque]." ⁵⁶
- On or around September 14, 2015, Fatah Central Committee member and Mahmoud Abbas advisor Sultan Abu Al-Einein warned of the Israeli enemy's attack against the Al-Aqsa Mosque and Jerusalem, asserting that the Israeli enemy aims to destroy about half of the Al-Aqsa Mosque after it completely takes it over. He then called upon on the Arab and Islamic nations to intervene immediately on all levels in order to restrain Israel and defend the Al-Aqsa Mosque from what the Jewish extremists are plotting against it. ⁵⁷
- On or around September 17, 2015, Abbas announced, "***Every drop of blood spilled in Jerusalem is pure, every shahid [martyr] will reach paradise, and everyone wounded will be rewarded, Allah willing.***" ⁵⁸

⁵⁶ Itamar Marcus and Nan Jacques Zilberdik, Palestinian Authority and Fatah officials behind Jerusalem terror, PALESTINIAN MEDIA WATCH (Sept. 20, 2015), <https://palwatch.org/page/8648>.

⁵⁷ *Id.*

⁵⁸ Abbas: "Every drop of blood that has been spilled in Jerusalem is holy blood as long as it was for Allah" "The Al-Aqsa [Mosque] is ours, and they have no right to defile it with their filthy feet," PALESTINIAN MEDIA WATCH (Sept. 17, 2015), <https://palwatch.org/page/8632> (originally

- On or around September 21, 2015, Secretary-General of the General Union of Palestinian Teachers Ahmed Sahwil declared, “We will redeem Al-Aqsa with our souls... and sacrifice our soul and blood.”⁵⁹
- On or around October 1, 2015, Fatah Central Committee Member Azzam Al-Ahmad justified the murder of Israeli Naama Henkin and Israeli-American Eitam Henkin as a “natural response to the herds of settlers’ crimes.” Eitam and his wife Naama were murdered on the road between Itamar and Elon Moreh in front of their four children, all nine years of age and under.⁶⁰
- On or around October 1, 2015, Fatah Central Committee member Mahmoud Al-Aloul posted a video on his Facebook page showing fighters from the Al-Aqsa Martyrs’ Brigades holding weapons. The chorus of the song encourages dying for Al-Aqsa Mosque, with lines such as “my blood will be shed for Al-Aqsa.”⁶¹
- On or around October 7, 2015, Fatah Central Committee Member Jamal Muhaisen stated, “*The settlers’ presence is illegal, and therefore every measure taken against them is legitimate and legal.*”⁶²
- Abbas invented acts of aggression by the Israeli Government to further his agenda of incitement, as well. On or around October 12, 2015, Palestinian Hassan Manasra, 15, and his cousin Ahmed Manasra, 13, stabbed a 13-year-old boy and 25-year-old man in the northern Jerusalem neighborhood of Pisgat Zeev, seriously wounding both. Abbas then (falsely) claimed that Israel had “executed” the two Palestinian teenage terrorists “in cold blood.” In reality, Hassan Manasra was killed after charging at police with a gun, while Ahmed Manasra was hit by a car while fleeing police. Ahmed survived. As Prime Minister Benjamin Netanyahu stated shortly after Abbas’s comments, “As Israel maintains the

appeared in *Al-Hayat Al-Jadida*, official PA daily).

⁵⁹ *Palestinian Authority teachers’ union calls for Palestinian Martyrdom: “We will redeem Al-Aqsa with our souls... and sacrifice our soul and blood,”* PALESTINIAN MEDIA WATCH (Sept. 21, 2015), <https://palwatch.org/page/8657> (originally appeared Official Palestinian Authority TV).

⁶⁰ *Only days after 4 Israelis murdered, Abbas calls “uprising” “peaceful”, inflames Palestinians, says Israel desecrates Al-Aqsa Mosque,* PALESTINIAN MEDIA WATCH (Oct. 12, 2015), <https://palwatch.org/page/8819> (originally appeared in *Al-Hayat Al-Jadida*, official PA daily).

⁶¹ *Fatah official posts song encouraging dying for the Al-Aqsa Mosque, with visuals of Fatah fighters,* PALESTINIAN MEDIA WATCH (Oct. 1, 2015), <https://palwatch.org/page/8690>.

⁶² *Itamar Marcus & Nan Jacques Zilberdik, Fatah officials: Killing “settlers” is legal and “national duty,”* PALESTINIAN MEDIA WATCH (Oct. 8, 2015), <https://palwatch.org/page/8750>.

status quo at the Temple Mount, *Abbas in his words of incitement is making cynical use of religion and thus bringing about more acts of terror.*"

- On or around October 14, 2015, PA state media reports that senior PA advisor and Fatah Central Committee member Sultan Abu Al-Einein "*supports, with all his might, the uprising and intifada... aimed at defending the Al-Aqsa Mosque*" from "defilement" and "Judaization."
- On or around October 17, 2015, Deputy Secretary of the Fatah Central Committee and Head of the Supreme Council for Sport and Youth Affairs, Jibril Rajoub stated the following on PA state television (the Fatah Central Committee is *the* governing body of Fatah, the primary branch of the PLO):

These [terror attacks] are individual acts of bravery, and I am proud of them. I congratulate everyone who carried them out. I say to you, we are proud of you... Whoever confronts, fights, dies as a Martyr, is arrested or injured – his identity is known. What I mean is that the fighter, the prisoner, or the Martyr, they are assets to the entire Palestinian people. We do not want to begin with statistics [regarding those who fight Israel] as to who is Fatah and who is not. This is not Fatah's concern. The Fatah movement is leading the Palestinian people to independence.⁶³

- On or around October 19, 2015, Secretary-General of the National Initiative movement and PA Member of Parliament Mustafa Barghouti emphasized that what is happening in the Palestinian Territories is "intifada" and that it is a "new excellent situation." *He then called for the intifada to continue.*⁶⁴
- On or around October 22, 2015, Fatah Spokesperson in Jerusalem Raafat Alayan stated that the *Fatah supports the*

⁶³ *Palestinian Authority official on Palestinian terror attacks: They are "acts of bravery, I am proud of them,"* PALESTINIAN MEDIA WATCH (Oct. 17, 2015), <https://palwatch.org/page/8873> (originally appeared on Official Palestinian Authority TV).

⁶⁴ *Palestinian Authority MP supports Palestinian wave of violence, calls it third Intifada, and calls for it to continue,* PALESTINIAN MEDIA WATCH (Oct. 19, 2015), <https://palwatch.org/page/8902> (originally appeared in Donia Al-Watan, independent Palestinian news agency).

current “mass insurgency” in the West Bank and Jerusalem. He then asserted that Abbas’ speech regarding the Temple Mount was an “inseparable part” of the “resistance.”⁶⁵

- On or around November 4, 2015, Secretary-General of the Palestine Liberation Front and PLO Executive Committee member Wasel Abu Yusuf emphasized the importance of preparing the “appropriate institutions” for the continued escalation of the “strong popular uprising” and of consolidating the national efforts in order to continue it.⁶⁶
- On or around November 10, 2015, “The [Palestinian] National Council (i.e., the legislative body of the PLO) emphasized, on the 11th anniversary of leader and symbol Yasser Arafat’s death as a Martyr (Shahid), the need to support our people’s struggle and popular insurgency which continues and escalates in the face of the occupation’s aggression, terror and brutality. . . The PLO saluted our heroic people for its legendary resolve on its land, as it defends its holy places, its Al-Aqsa Mosque, and its right to free itself from the yoke of occupation.”⁶⁷
- On or around December 9, 2015, the official PA state newspaper glorified the “stabbing intifada” in the following fashion:

The ‘Knife Revolution’ or ‘Knife Intifada’ which broke out over two months ago in order to protect the blessed Al-Aqsa Mosque, has witnessed heroic activity and revolutionary escalation by the young people, boys, and girls of Palestine, filled with love for their homeland. This Palestinian uprising broke out due to the desecration of the sanctity of the Al-Aqsa Mosque and holy sites by the settlers, and this Palestinian rebellion against the Israeli

⁶⁵ *Fatah supports “the current Palestinian mass insurgency” and “did not throw down its weapons,”* PALESTINIAN MEDIA WATCH (Oct. 22, 2015), <https://palwatch.org/page/8931> (originally appeared in *Donia Al-Watan*, independent Palestinian news agency).

⁶⁶ *PLO official: We must continue to escalate the “strong popular uprising” (i.e., terror attacks against Israelis),* PALESTINIAN MEDIA WATCH (Nov. 4, 2015), <https://palwatch.org/page/9062> (originally appeared in *Ma'an*, independent Palestinian news agency).

⁶⁷ *PLO National Council emphasizes its support for the “popular insurgency” to defend Al-Aqsa Mosque,* PALESTINIAN MEDIA WATCH (Nov. 10, 2015), <https://palwatch.org/page/9113> (originally appeared in *Ma'an*, independent Palestinian news agency).

tyranny and occupation has spread to all of Palestine...⁶⁸

- On or around December 11, 2015, a Fatah official appeared on official PA state TV to declare martyrs to be “giants and leaders,” and that the most recent one should have “an institution named after him.”⁶⁹
- On or around December 16, 2015, in its weekly meeting in Ramallah, the PA legitimized terror attacks against Israelis, stating that Palestinians have the “legal right” to fight Israel “by every possible means of struggle.”⁷⁰
- That same day, the Jerusalem Branch of Fatah announced in a statement the “*continuation of the intifada*” in order to “*thwart all efforts of the occupation and its Zionist fanatic gang to defile the blessed Al-Aqsa Mosque.*”⁷¹
- On or around December 20, 2015, Fatah Central Committee member Mahmoud Al-Aloul declared in a public interview that “popular resistance”—i.e., terrorism—is the “only choice” Palestinians have.⁷²
- On or around December 24, 2015, Fatah Central Committee member Amal Hamad praised female terrorists “beginning with Dalal Mughrabi and ending with all the women of Palestine.”
- On or around December 28, 2015, Fatah Revolutionary Council member, Hassan Shtewi appeared on PA official state TV to praise the recent terror attacks as “heroic acts. . .which greatly terrify the occupation” and to encourage

⁶⁸ *Official Palestinian Authority daily glorifies terror wave: “the Palestinian blood has merged with all areas of [Israel and PA areas], as the Palestinian knife has an important role in the slaughtering of those law breakers [i.e., Israelis],”* PALESTINIAN MEDIA WATCH (Dec. 9, 2015), <http://palwatch.org/page/9327> (originally appeared in *Al-Hayat Al-Jadida*, official PA daily).

⁶⁹ Itamar Marcus & Nan Jacques Zilberdik, *Fatah official: “Whoever succeeded in killing, this is a big thing,”* PALESTINIAN MEDIA WATCH (Dec. 11, 2015), <https://palwatch.org/page/9336>.

⁷⁰ *Palestinian Authority government legitimizes terror attacks: Palestinians have “legal right” to fight Israel “by every possible means of struggle,”* PALESTINIAN MEDIA WATCH (Dec. 16, 2015), <https://palwatch.org/page/9364> (originally appeared in *Al-Hayat Al-Jadida*, official PA daily).

⁷¹ *Fatah’s Jerusalem branch: We will continue the intifada in order to “thwart all efforts of the occupation and its Zionist fanatic gang to defile the blessed Al-Aqsa Mosque,”* PALESTINIAN MEDIA WATCH (Dec. 16, 2015), <https://palwatch.org/page/9365> (originally appeared in Ma'an, independent Palestinian news agency).

⁷² *Fatah official: “Only choice” Palestinians have is “popular resistance” (i.e., terror wave),* PALESTINIAN MEDIA WATCH (Dec. 20, 2015), <https://palwatch.org/page/9379> (originally appeared in *Al-Hayat Al-Jadida*, official PA daily).

Palestinian leadership to support and "take care of" Palestinians who carry them out.⁷³

- On or around December 29, 2015, Member of Fatah Central Committee, Abbas Zaki stated on PA official state TV:

This is a year of challenge. *We must challenge [the occupation] without fear. . .or by the sacrifices being made now by our young people, with rocks and knives, through which Palestinians have once again imposed a new parameter in the equation of the struggle. . .We are now witnessing a phenomenon called peaceful popular resistance.* How? These young people, youth, believed in Allah and Allah loved them and took them to Him, but their funerals are greater than those of the leaders and the sympathy for them is great.⁷⁴

- On or around December 29, 2015, Secretary of the Tulkarem branch of the Fatah movement Muayyad Sha'aban emphasized asserted on PA official state TV that *Fatah was "leading" the "current uprising," i.e., the stabbing intifada.*⁷⁵
- On or around December 30, 2015, Secretary-General of the Palestinian Liberation Front (PLF) and PLO Executive Committee member Dr. Wasel Abu Yusuf said that (paraphrased from the independent Palestinian newspaper *Amad*) *"the Palestinian leadership must take at this time is to embrace the intifada in all its details."*⁷⁶

⁷³ *Fatah official praises terror attacks as "heroic acts... which greatly terrify the occupation," encourages Palestinian leadership to support and "take care of" Palestinians who carry them out,* PALESTINIAN MEDIA WATCH (Dec. 28, 2015), <https://palwatch.org/page/9429> (originally appeared on *Official Palestinian Authority TV*).

⁷⁴ *Fatah leader: Allah loves young Palestinians who stab Israelis. It is "peaceful resistance,"* PALESTINIAN MEDIA WATCH (Dec. 29, 2015), <https://palwatch.org/page/9436> (originally appeared on *Official Palestinian Authority TV*).

⁷⁵ *Fatah secretary of Tulkarem branch: Fatah is leading the current "popular uprising,"* PALESTINIAN MEDIA WATCH (Dec. 29, 2015), <https://palwatch.org/page/9441> (originally appeared in *Al-Hayat Al-Jadida*, official PA daily).

⁷⁶ *PLO official: "The Palestinian leadership must... embrace the intifada in all its details,"* PALESTINIAN MEDIA WATCH (Dec. 30, 2015), <https://palwatch.org/page/9447> (originally appeared on *Amad*, independent Palestinian news website).

- On or around January 2 2016, Deputy Secretary of the Fatah Central Committee Jibril Rajoub—one of the most powerful people in the PA—reported on Fatah’s decision to support the continuation of the ongoing terror wave launched in September. The Fatah Central Committee is *the* governing body of Fatah, the primary branch of the PLO:

Yesterday in Hebron, they escorted 17 Martyrs to burial. This is of course a source of pride for all of us. I say that whoever carried out individual acts of heroism, we in the Fatah movement bless and encourage them. We consider them heroes and a crown on the head of every Palestinian. At this point, when there is weakening and frustration, there is a group of people, beginning with our brother Muhannad Halabi (i.e., murdered 2) and ending with the last Martyr. . **.There is a competition between individuals. This is one of the issues we need to address – are we for or against it? I say that we in the [Fatah] Central Committee have discussed this matter, and we are in favor.**

- On or around January 11, 2016, Defendant PLO announced approval of a new series of payments to the latest round of martyrs, referring to the “Jerusalem intifada,” incited by Abbas, as the “popular uprising”:

The National Association of the Martyrs' Families of Palestine announced yesterday that as of the day before [Jan. 11, 2016] the number of Martyrs of the popular uprising is 153 male and female Martyrs. Secretary-General of the association Muhammad Sbeihat said that. . the body that approves Martyrs is the institution that takes care of the families of Martyrs and wounded, and it is an official body under the PLO, and not the [PA] Ministry of Health, which carries out its professional task according to the PA's laws and regulations.

Sbeihat said: ‘There are a number of media outlets that are trying to awaken this topic in a negative way, as if the PA

is avoiding verifying the number of Martyrs,' and emphasized that this is absolutely not true, this is cheap populism and an unacceptable and false attempt to slander. Secretary-General of the association Sbeihat clarified that the institution to take care of the families of Martyrs and injured approves all the Martyrs of the Palestinian cause, whether they are from within the homeland or from the Diaspora, without any reference to their belonging or political leanings, and gives them monthly allowances.⁷⁷

- On or around February 1, 2016, the official PA daily newspaper refers to the 166 terrorists killed thus far during the Palestinian terror wave, initiated in October 2015, as “martyrs.”⁷⁸
- On or around February 3, 2016, Defendants’ leader Abbas met with the families of various terrorists, promising some that he would compensate them for the loss of their homes, which had occurred as a result of their family members’ commission of a terror attack.
- That same day, ***Fatah posted a tribute on its official Facebook page, referring to the three terrorists who murdered an Israeli policewoman as “role models.”*** The terrorists attacked the policewomen after they were asked for identification. They were carrying machine guns, knives, and pipe bombs, leading the police to suspect they were planning a mass attack against civilians.⁷⁹
- Fatah continued to glorify and celebrate the three terrorists for several days following the attack on both its official Facebook account and on its official Twitter (now X) account.
- On or around February 6, 2016, Defendants’ leader ***Abbas held a reception in Ramallah for the families of martyrs from Hebron in order to recognize the heroism of them.*** There, Abbas affirmed his commitment to “take care of all of them.”⁸⁰

⁷⁷ PLO organization approves list of “Martyrs,” pays allowances to families of terrorists, PALESTINIAN MEDIA WATCH (Jan. 13, 2016), <https://palwatch.org/page/9551> (originally appeared in *Al-Hayat Al-Jadida*, official PA daily).

⁷⁸ Official Palestinian Authority daily calls 166 terrorists killed during Palestinian terror wave between October 2015 – January 2016 “martyrs,” PALESTINIAN MEDIA WATCH (Feb. 1, 2016), <https://palwatch.org/page/9656> (originally appeared in *Al-Hayat Al-Jadida*, official PA daily).

⁷⁹ *Fatah: Three murderers of Israeli policewoman in Jerusalem terror attack are “role models,”* PALESTINIAN MEDIA WATCH (Feb. 3, 2016), <https://palwatch.org/page/9663>.

⁸⁰ *Abbas holds reception for Martyrs’ families in Hebron as recognition of their heroism, and reiterates his commitment to “take care of all of them,”* PALESTINIAN MEDIA WATCH (Feb. 6,

- On or around February 6, 2016, it was reported that PLO official Wasel Abu Yusuf called for an escalation and expansion of the Jerusalem intifada:

Secretary-General of the Palestinian Liberation Front and PLO Executive Committee member Dr. Wasel Abu Yusuf. . . said in an interview with the media in Ramallah. . . that *the intifada activities against the occupation and its herds of settlers must be escalated and broadened, and to use all our capabilities and means in order to put pressure on the occupation by activating Palestine's embassies abroad.* . . . Abu Yusuf saluted the intifada's Martyrs, who have redeemed their land with their pure blood, and emphasized the continuation of the path of struggle, and the advancement toward the strengthening of the national unity on the way to the liberation of Palestine.⁸¹

- On or around February 7, 2016, Fatah refers to Jerusalem's Damascus Gate, the site of many terror attacks, as "a gate of freedom and honor, and a gate for the Martyrs" on its official Facebook page.⁸²
- On or around February 9, 2016, Fatah Central Committee member and Fatah Commissioner for Mobilization and Organization Mahmoud Al-Aloul emphasized Fatah and Abbas' support for the Jerusalem intifada, referred to as the "peaceful popular uprising" by the PA.⁸³

2016), <https://palwatch.org/page/9688> (originally appeared on Official PA TV Live).

⁸¹ PLO official: "The intifada activities against the occupation and its herds of settlers must be escalated," PALESTINIAN MEDIA WATCH (Feb. 6, 2016), <https://palwatch.org/page/9684> (originally appeared on *Amad*, independent Palestinian news website).

⁸² Jerusalem's Damascus Gate, site of many terror attacks, is "a gate of freedom and honor, and a gate for the Martyrs," PALESTINIAN MEDIA WATCH (Feb. 7, 2016), <https://palwatch.org/page/9696>.

⁸³ Fatah official: Abbas and Fatah support the "peaceful popular uprising" (i.e., terror wave), PALESTINIAN MEDIA WATCH (Feb. 9, 2016), <https://palwatch.org/page/9709> (originally appeared in *Donia Al-Watan*, independent Palestinian news agency). To justify murder as legitimate and "peaceful," PA leaders and officials cite UN Resolution 3236 which "recognizes the right of the Palestinian people to regain its rights by all means." The PA interprets "all means" as including violence against civilians. However, this distorts the intention of the UN. The continuation of Resolution 3236, which is never cited by PA leaders, states that the use of "all means" should be "in accordance with the purposes and principles of the Charter of the United Nations." The UN

- On or around February 13, 2016, Fatah Central Committee member Mahmoud Al-Aloul emphasized that (paraphrased from PA official state newspaper *Al-Hayat Al-Jadida*) ***“Fatah was the first to wage a mass confrontation during the current popular uprising on Sept. 29 [2015], and that it has led all the confrontations throughout the homeland, and that most of the Martyrs (Shahids) and injured came from within it.”***
- On or around February 17, 2016, PA National Security Forces posted on its official Facebook page a photograph of Abbas, declaring “[W]e welcome martyrdom.”
- That same day, Fatah posted on its official Facebook page the following message:

Call out to the weapon philosophers over
and over, long live the men of Fatah, the
storm of fighting.

***Stand on the Martyr’s grave and let out
cries of joy, and recite verses of struggle
for him.***

***Fatah does not forget its people’s blood,
and tomorrow the mountains’ giants will
avenge my blood.***

- On or around February 18, 2016, Fatah, at its parliamentary faction meeting, expressed pride in the “popular uprising” being waged against Israel.⁸⁴
- On or around February 22, 2016, Secretary of Fatah's Jenin branch Jamal Jaradat ***“emphasized that that the peaceful popular uprising must be escalated against the crimes and terror of the Israeli occupation and its settlers,”*** as paraphrased in *Donia Al-Watan*, an independent Palestinian news agency.⁸⁵
- On or around March 1, 2016, ***Fatah Central Committee member Amal Hamad expressed that he was proud that Fatah was “still leading the popular uprising... 80% of martyrs are Fatah people.”***⁸⁶

Charter prohibits targeting civilians, even in war. Chapter 1, Article 1, opens by saying that “international disputes” should be resolved “by peaceful means.”

⁸⁴ *Fatah expresses pride in the “peaceful popular uprising” (i.e., terror wave)*, PALESTINIAN MEDIA WATCH (Feb. 18, 2016), <https://palwatch.org/page/9763> (originally appeared in *Donia Al-Watan*, independent Palestinian news agency).

⁸⁵ *Fatah spokesperson on meeting led by Abbas: “The Fatah Central Committee praised the... popular peaceful resistance” (i.e., terror wave)*, PALESTINIAN MEDIA WATCH (Mar. 1, 2016), <https://palwatch.org/page/9813> (originally appeared in *Al-Hayat Al-Jadida*, official PA daily).

⁸⁶ *Fatah official proud that Fatah is “still leading the popular uprising... 80% of Martyrs are*

iii. **The March 2016 Terrorist Murder of Taylor Force**

125. Taylor Force, an American citizen from Lubbock, Texas, graduated from West Point in 2009 and served as a field artillery officer in the U.S. Army at Fort Hood until 2014. He had completed tours of duty in both Iraq and Afghanistan. At the time of his death, he was in his first year of business school at Vanderbilt University.

126. On March 8, 2016, while visiting the Jaffa section of Tel Aviv, Mr. Force was stabbed to death in a terror attack, during which 10 others were wounded. Mr. Force had been visiting Israel as part of his Vanderbilt MBA program, on a school trip to study global entrepreneurship.

127. Mr. Force's murderer, Bashar Massalha, hailed from the West Bank town of Qalqilya and was eliminated by Israeli security forces at the scene of the attack.

128. Upon information and belief, Massalha stabbed and killed Mr. Force, as well as injured ten others, as a result of Defendants' massive campaign of incitement in the months preceding the attack and out of the knowledge that he would collect payment under Pay for Slay. Upon information and belief, Massalha killed Mr. Force and wounded 10 others out of a desire to kill Jews, knowing that if he were to be caught or killed, he or his family would collect payment under Pay for Slay. Like all Palestinians, Massalha had been taught by Defendants that Jews have to be exterminated, that killing Jews must be done for Allah, that Jews stole Palestinian land, and that Palestinians have the right under international law to engage in "armed struggle."

Fatah people," PALESTINIAN MEDIA WATCH (Mar. 1, 2016), <https://palwatch.org/page/9812> (originally appeared on Official PA TV).

129. Upon information and belief, Massalha approached the boardwalk in Jaffa where Mr. Force and others were congregated on March 8, 2016, with the intention of stabbing and killing civilians.

iv. Defendants Celebrated Mr. Force's Murder

130. That same day, the PLO's Fatah celebrated the attack on its official Facebook account, referring to Massalha as "the heroic martyr."⁸⁷ The following day, the official news station of the PA labeled Massalha a "martyr" (meaning the murderer died for Allah, will be rewarded by Allah, and that Taylor's murder was a positive religious act) and referred to the victims of the attack as "settlers." Meanwhile, the official Twitter account (now X) of the PA's ruling party Fatah celebrated Massalha as a "hero" and a "martyr."⁸⁸

131. In March 2016, PA Prime Minister Rami Hamdallah sponsored an event in Jenin honoring the families of martyrs from the most recent "popular uprising"—a reference to the 2015 to 2016 "stabbing intifada."⁸⁹ The event served to further fête Mr. Force's killer and other terrorists like him.

132. A few months later, on May 21, 2016, the official news station of the PA glorified Massalha again, referring to him as a "martyr" 11 times. Describing Massalha's funeral, the PA TV reporter explained that the funeral was "a large national wedding befitting

⁸⁷ Itamar Marcus, *Fatah celebrates murder of American tourist*, PALESTINIAN MEDIA WATCH (Mar. 9, 2016), <https://palwatch.org/page/9856>.

⁸⁸ TOI Staff, *Official Palestinian TV calls Jaffa terrorist a 'martyr,' victims 'settlers,'* TIMES OF ISRAEL (Mar. 9, 2016), <https://www.timesofisrael.com/official-palestinian-tv-describes-jaffa-attacker-as-martyr/>.

⁸⁹ *Jenin district and Fatah official honor families of "Martyrs" from 2015-2016 terror wave as well as two terrorists who murdered Israelis in the 80s and 90s*, PALESTINIAN MEDIA WATCH (Mar. 30, 2016), <https://palwatch.org/page/9974> (originally appeared in *Al-Hayat Al-Jadida*, official PA daily).

of martyrs.”⁹⁰ That same day, the official daily newspaper of the PA *Al-Hayat Al-Jadida* announced, “Masalha died as a Martyr on March 8 [2016], after carrying out a stabbing operation in Jaffa, in which he killed an American tourist.”

133. A longer excerpt of the reporting from the official news station of the PA is provided below:

Official PA TV newsreader: In Qalqilya, hundreds of citizens accompanied the body of Martyr Bashar Masalha [to his burial. . .

Official PA TV reporter: After delays by Israel in the transfer of his body, Martyr Bashar Masalha’s family, from the village of Hajja, east of Qalqilya, received their son in the evening. . .The Martyr Bashar returned from Qalqilya to his village Hajja in a procession. . .His family, friends, and people of the region took it upon themselves to ensure that this [burial] would be a large national wedding befitting of Martyrs. . .The Martyr was accompanied to his last resting place in the cemetery for Martyrs in Hajja. . .

Funeral participant: Despite the delays by the Israeli side transferring the Martyr’s body. . .the PA did everything it could and applied national and political pressure to the other side so they would transfer the Martyr’s body. Despite what they (i.e., the Israelis) did, the Palestinian will prevailed and we received the Martyr’s body. . .

Official PA TV reporter: Martyr Bashar Masalha, 22, ascended to Heaven in Jaffa on March 8 [2016] (i.e., he was shot after killing US tourist)... He returned and was embraced by the soil of his homeland as a Martyr.⁹¹

134. Upon information and belief, in addition to receiving the immediate reward of 6,000 shekels upon the death of Massalha, Massalha’s family has received 159,600 shekels

⁹⁰ Itamar Marcus, *Official Palestinian Authority media glorifies murderer of US tourist, Taylor Force*, PALESTINIAN MEDIA WATCH (May 24, 2016), <https://palwatch.org/page/10267>.

⁹¹ *Id.*

(approximately \$48,150 USD) in payment since the death of Mr. Force as a reward for Massalha's murder of Mr. Force. Upon information and belief, Massalha's family continues to receive 1,4000 shekels each month, to this day, and will for the rest of their lives.

135. In the year of Mr. Force's death, reward payments under the entire Pay for Slay system totaled approximately \$315 million.

v. **Defendants' Role in Mr. Force's Murder Results in the Taylor Force Act**

136. Mr. Force's death brought much-needed attention to the horrific Pay for Slay system, which outraged members of Congress who saw the need to take swift action against the terror financing system. In 2018, Congress passed the Taylor Force Act ("TFA"), which prohibits American economic assistance that "directly benefits the Palestinian Authority" as long as Defendant PA continues to pay financial rewards for terrorism. *See* Taylor Force Act, Public Law No: 115-269 (October 23, 2018).

137. The TFA, adopted by a bi-partisan majority, declares unequivocally that "[t]he Palestinian Authority's practice of paying salaries to terrorists serving in Israeli prisons, as well as to the families of deceased terrorists, is an incentive to commit acts of terror."

138. The TFA requires that the PA end payments for acts of terrorism against American and Israeli citizens; that the PA revoke any laws that implement the system of compensation known as Pay for Slay; and that the PA publicly condemn acts of terrorism, investigate the perpetrators, and prosecute the perpetrators.

139. Following the passage of the TFA, the United States significantly reduced aid to the PA, eventually ending aid that would have directly benefited the PA altogether.

140. Despite the implementation of the TFA, Defendants continue to fund, reward, and glorify terrorism against American and Israeli citizens. Since the passage and implementation of the TFA, Defendants have spent an estimated \$1 billion in terrorist rewards to either imprisoned terrorists or the martyrs' families.⁹²

vi. **Defendants Elevate Their Drumbeat to Encourage Terrorism in the Weeks Leading to the Terror Attack against the Gez Family**

141. The phenomenon of incitement to terror summarized above repeats itself in Palestinian society, thanks to Defendants monomaniacal focus on destroying Israel.

142. The months prior to the May 2025 terror attack against the Gez family, in which Plaintiff Hananel Gez was injured and his wife and son murdered, reflected a grotesque celebration of martyrdom by Defendants. Examples of rhetoric by Defendants' officials and representatives follow:

- On February 3, 2025, Defendant PA announced *another* benefit for imprisoned terrorists. PA Ministry of Interior Spokesman Muhammad Tamimi stated, "In accordance with His Honor [PA] President [Abbas'] decision to exempt prisoners (i.e., terrorists) from fees, we have printed passports for the prisoners who were released and expelled to Egypt."
- On March 8, 2025, Defendant PA chose International Women's Day to specifically glorify mass murderer Dalal Mughrabi, the woman who led the Coastal Road Massacre, which was the most lethal attack in Israel's history prior to October 7, 2023. Mughrabi, along with other Fatah terrorists, hijacked a bus, murdered 37 people, 12 of which were children, and wounded 70.
- On March 11, 2025, Senior Fatah leader Abbas Zaki sang the praises of the mothers who publicly celebrate their sons' deaths. He also lauded the mothers who even give their sons the stones to throw at Israelis with the full knowledge that their children

⁹² Lt.-Col. (res.) Maurice Hirsch, *How Will We Know the PA Has Ended the 'Pay-for-Slay' Policy?*, JERUSALEM CENTER FOR SECURITY AND FOREIGN AFFAIRS (May 28, 2025), <https://jcfa.org/how-will-we-know-the-pa-has-ended-the-pay-for-slay-policy/>.

will die. Sending her son to his death, however, is not in vain, according to Zaki: “She begins to feel that she has gained respect and high status in society when her son dies as a Martyr.”⁹³

- On April 16, 2025, Fatah Nablus Branch Secretary Muhammad Hamdan announced on Facebook, “We will always and forever stand by the national, material, and moral rights of the prisoners [*i.e.*, terrorists]. This is what His Honor [PA] President [Abbas] said at the UN podium, and this is what we say today on behalf of all of you. We will stand with these heroes and with their wives, their mothers, and their relatives, and we will not retreat.”
- On April 23, 2025, Defendant PA President Abbas reaffirmed that violence was the path forward to “liberat[ion]”: “Ever since the Fatah Movement started it has had two slogans. The armed struggle is the path to liberate Palestine, and [we] shouldn't interfere in the affairs of the Arab [states], and the Arab [states] shouldn't interfere in our affairs. This has been the case from day one, and we are in favor of it.”

143. Furthermore, in the months prior to the attack against the Gez family, PA religious figures appeared on official PA TV repeatedly praying for the extermination of Jews “one by one.” Significantly, in publicizing the prayers to kill Jews “one by one,” Defendant PA sent the message to Palestinians that even shooting at a lone car and killing only one Jew has value.

- PA Shari’ah Judge Abdallah Harb: “Allah, strike the aggressive Jews... count them and kill them one by one, and do not leave even one.” [Official PA TV Live, July 5, 2024]
- Preacher on Official PA TV: “O Allah, strike the thieving Jews, O Master of the Universe. Allah, count them and kill them one by one, and do not leave even one.” [Official PA TV, Aug. 9, 2024]
- PA Supreme Shari'ah Court Director Alaa Dweikat: “Strike the aggressive Zionists. O Allah, kill them one by one and count them one by one, and do not leave [even] one.:” [Official PA TV, Oct. 25, 2024]
- Official PA TV Preacher: “Allah, strike the Jews. . .kill them one by one, and do not leave even one.” [Official PA TV, Jan 10, 2025]

⁹³ Ephraim D. Tepler & Itamar Marcus, *Palestinian Authority leader: A woman gains “respect and high status in society when her son dies as a Martyr,”* PALESTINIAN MEDIA WATCH (Mar. 11, 2025), <https://palwatch.org/page/37017>.

- PA Shari'ah Judge Abdallah Harb: “[Muslims] part of your faith is threatened, and it is occupied and defiled [by Israel]. . . Allah, count them one by one, kill them one by one, and do not leave even one.” [Official PA TV, Jan 24, 2025]

144. In May 2025 alone, there were 426 terror attacks against Israelis recorded, including three shooting attacks, 20 pipe bomb attacks, 297 stone-throwing incidents, 42 fire bomb attacks, 60 arson/tire burning incidents, one car-ramming attack, and one stabbing attack.⁹⁴

145. The following month, 370 terror attacks were recorded against Israelis, including 36 pipe bomb attacks, 280 stone-throwing incidents, 34 firebomb attacks, 17 arson/tire burning incidents, one IED incident, one stabbing attack, and one car-ramming attack.⁹⁵

146. In July 2025, 424 terror attacks were recorded against Israelis, including 25 pipe bomb attacks, 310 stone-throwing incidents, 47 firebomb attacks, 36 arson/tire burning incidents, three stabbing attacks, two shooting attacks, and one car-ramming attack.⁹⁶

147. In August 2025, 287 terror attacks were recorded, including were 13 pipe bomb attacks, 221 stone-throwing incidents, 30 firebomb attacks, 20 arson/tire burning incidents, two stabbing attacks, and one shooting attack.⁹⁷

148. None of these attacks have been condemned by Defendants.

vii. The May 2025 Terror Attack against the Gez Family

149. On May 14, 2025, while on their way to the hospital to deliver the couple's fourth son, Hananel and Tzeela Gez of Samaria were ambushed in their car on Highway 466

⁹⁴ GOV'T OF ISRAEL, *Wave of Terror 2015–2025* (last visited Oct. 15, 2025), <https://www.gov.il/en/pages/wave-of-terror-october-2015>.

⁹⁵ *Id.*

⁹⁶ *Id.*

⁹⁷ *Id.*

by Palestinian terrorists, including one named Nael Samarah.

150. Hananel Gez suffered shrapnel wounds to his chest and an injury to his hand, while Tzeela Gez suffered life-threatening injuries to both herself and her unborn child. Medics who arrived at the scene discovered Tzeela Gez unconscious but alive, with gunshot wounds to her chest and neck.

151. Tzeela was quickly transported to a hospital in Petah Tikva, where doctors performed an emergency Caesarean section and delivered the baby in serious but stable condition. Tzeela Gez did not survive. Baby Ravid Haim Gez lived 15 days before succumbing to his wounds.⁹⁸

152. Three days after the shooting of the Gez family, the IDF conducted counterterrorism operations in the village of Bruchin. One of the terrorists, Nael Samarah, was shot after he approached troops while carrying a suspicious bag and screaming “Allahu Akbar.” Inside the bag was an M16 rifle and other weapons.⁹⁹

153. Samarah committed the terror attack against the Gez family out of a desire to kill Jews like Hananel, his wife Tzeela, and their unborn son, knowing that if caught or killed, he (or his family) would collect payment under Pay for Slay. As described previously, Defendants openly taught that Jews have to be exterminated, that killing Jews must be done for Allah, that Jews stole Palestinian land, and that Palestinians have the right under international law to engage in “armed struggle.”

⁹⁸ Jeremy Sharon, *Baby of pregnant terror victim dies after fighting for his life for two weeks*, TIMES OF ISRAEL (May 29, 2025), <https://www.timesofisrael.com/baby-of-pregnant-terror-victim-dies-after-fighting-for-his-life-for-two-weeks/>.

⁹⁹ Jerusalem Post Staff, *IDF maps homes of terrorists responsible for murder of Tzeela Gez last week*, JERUSALEM POST (May 23, 2025), <https://www.jpost.com/breaking-news/article-855156>.

154. Upon information and belief, on May 14, 2025, Samarah approached Route 446 near the Peduel Junction in the Binyamin region with the intention of shooting at cars with Israeli license plates, like the one affixed on the Gezs' vehicle, in the hopes of killing Jews.

155. Though Nael Samarah was a member of Hamas, he has been recognized by Defendants as a martyr eligible for payment under Pay for Slay. As announced in Palestinian state-run media:

It should be noted that Nael Sami Abdul Rahman Samarah, a 36-year-old young man, died as a Martyr on May 17, 2025 after occupation forces shot him with live bullets in the Al-Balata area of the town of Bruqin. Official PA daily, *Al-Hayat Al-Jadida*, Sept. 15, 2025.¹⁰⁰

156. Pay for Slay payments for the month of May were processed on August 6, 2025.

157. Therefore, upon information and belief, for injuring Hananel and killing his wife and child, Samarah's family received the one-time immediate payment of approximately 6,000 shekels from Defendants PA and PLO at least by August 6, 2025, as well as monthly stipends of 1,400 shekels thereafter.

viii. Defendants Aided and Abetted the Death of Taylor Force and the Terror Attack against the Gez Family

158. Defendants, through their sprawling Pay for Slay rewards system, accompanied by countless public statements asserting their continued commitment to fund, reward, and honor Palestinian terrorists, provided the incentives and catalysts that aided and abetted the death of Taylor Force and the terror attack against the Gez family that wounded Hananel and killed his wife and son.

¹⁰⁰ Itamar Marcus, *Will today's murderer be a "Martyr" whose family will receive lifetime Palestinian Authority terror rewards?*, PALESTINIAN MEDIA WATCH (Sept. 18, 2025), <https://palwatch.org/page/41524>.

159. Both Samarah and Massalha committed these murders because Defendants had engaged in a relentless campaign instructing them that murdering Israelis was the right and moral thing to do and had established a financial incentive system to reward them for doing so. All devised, executed, maintained, and overseen by Defendants.

160. Defendants' incitement campaign was systematic and violent. Defendants presented Jews as the enemies of humanity and Allah; as Satan in human form; as humanoids; as cursed by Allah; and as monkeys and pigs who have lost the right to exist and are destined to be exterminated. Defendants presented the killing of Jews as heroic, virtuous, legal under international law, and compliant with Allah's will.

161. Upon information and belief, Defendants provided Massalha's family with large financial reward for Massalha's murder of Taylor Force, and, upon information and belief, Defendants provided the family of Samarah with at least one payment of 6,000 shekels thus far following his death and after he injured Hananel Gez and murdered Tzeela and Ravid Haim Gez.

162. Therefore, after April 18, 2020, upon information and belief, Defendants have, directly or indirectly, made payments to family members of both terrorists following the death of Taylor Force and the terror attack against the Gez family. These payments were made in exchange for committing acts of terrorism that injured or killed nationals of the United States, and such payments were made by reason of the deaths and injuries of such terrorists. See 18 U.S.C. § 2334(e)(1)(A)(ii).

COUNT I
VIOLATION OF THE ANTI-TERRORISM ACT, 18 U.S.C. § 2333(d)
(Aiding and Abetting Liability)
(Plaintiff Force and Plaintiff Gez)

163. Plaintiffs repeat and reallege paragraphs 1 through 158.

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

165. “[L]iability may be asserted as to any person who aids and abets, by knowingly providing substantial assistance, or who conspires with the person who committed such an act of international terrorism.” 18 U.S.C. § 2333(d)(2).

166. “International terrorism” is defined as “violent acts or acts dangerous to human life that are a violation of the criminal laws of the United States or of any State, or that would be a criminal violation if committed within the jurisdiction of the United States or of any State” and “appear to be intended to appear to be intended to . . .intimidate or coerce a civilian population;. . .to influence the policy of a government by intimidation or coercion; or. . .to affect the conduct of a government by mass destruction, assassination, or kidnapping; and occur primarily outside the territorial jurisdiction of the United States, or. . .transcend national boundaries in terms of the means by which they are accomplished, the persons they appear intended to intimidate or coerce, or the locale in which their perpetrators operate or seek asylum.” 18 U.S.C. § 2331(1).

167. Plaintiffs are nationals of the United States or the estates, survivors, and or heirs of such nationals, who were each injured in their person, property, and/or business as a result of international terrorism.

168. Plaintiff Stuart Force brings this action both individually and on behalf of the Estate of Taylor Force, a U.S. national who was injured in his person, property, and/or business as a result of international terrorism, as Taylor Force was murdered by a Palestinian terrorist. The murder of

Taylor Force also caused and continues to cause Stuart severe injury, including pain and suffering, loss of companionship and society, and severe emotional distress and anguish. Plaintiff Force also believes that the stress and anguish of losing Taylor contributed to his wife Robbi L. Force's death earlier this year.

169. Plaintiff Hananel Gez brings this action individually as a U.S. national who was injured in his person, property, and/or business as a result of international terrorism. In addition to suffering shrapnel wounds to his chest and an injury to his hand, Hananel has experienced and continues to experience emotional and psychological trauma, mental anguish, loss of companionship and consortium, and suffering as a result of the terror attack that killed his wife and son.

170. The acts committed, planned, or authorized by the terrorists who harmed Plaintiffs appear to have been, and were intended to do the following: (a) intimidate or coerce the civilian populations of Israel, the United States, and other countries; (b) influence the policy of the Governments of Israel, the United States, and other countries by intimidation or coercion; or (c) affect the conduct of the Governments of Israel or the United States by mass destruction, assassination, or kidnapping.

171. Moreover, Defendants themselves and through their respective officials, representatives, spokesmen, media, and other agents, (a) repeatedly admitted to committing acts of terrorism and violence against the civilian population in Israel and the West Bank and expressly stated that these acts were intended both to intimidate and coerce that civilian population into acquiescing to Defendants' political goals and demands and to influence the policy of the United States and Israeli governments in favor of Defendants' political goals and demands, and (b)

expressly threatened the further occurrence of such terrorist acts if their political goals and demands were not achieved.

172. The acts committed, planned, or authorized by the terrorists who harmed Plaintiffs would violate the criminal laws of the United States and many states, had they been committed in the United States.

173. Furthermore, Defendants' acts—which include the establishment, execution, and maintenance of the Pay for Slay system—constitute a violation of the criminal laws of the United States and of the several States, or would constitute criminal violations if committed within the jurisdiction of the United States and of the several States. In addition to aiding and abetting murder, Defendants have committed criminal solicitation, which is a crime under 18 U.S.C. § 373 and under New York State Law, including N.Y. Penal L. §§ 100.08, 125.25.

174. The acts committed, planned, or authorized by the terrorists who harmed Plaintiffs occurred primarily outside the United States.

175. Therefore, the acts of violence that harmed Plaintiffs were acts of international terrorism, as defined by 18 U.S.C. § 2331(a), cross-referenced in 18 U.S.C. § 2333(a).

176. Defendants advocated, encouraged, solicited, facilitated, incited, sponsored, and glorified acts of violence and terrorism against both Jewish civilians in Israel and the Judea and Samaria regions of the West Bank and visitors to such regions.

177. Not only do these acts constitute “substantial assistance” under the civil portion of the Antiterrorism Act, but they also satisfy the Antiterrorism Act's criminalization of providing “material support or resources” to a Foreign Terrorist Organization. *See* 18 U.S.C. §§ 2339A and 2339B.

178. By aiding and abetting thousands of terrorists in committing, planning, or authorizing acts of international terrorism, including the acts that caused each of the Plaintiffs to be injured in his or her person and property, Defendants are liable pursuant to 18 U.S.C. § 2333(d) for, threefold any and all, damages that Plaintiffs have sustained as a result of such injuries, and the costs of this suit, including attorneys' fees.

179. As a result of the international terrorism that Defendants aided and abetted, Taylor Force was killed, and Plaintiff Force has been deprived of the services, society, company, guidance, and companionship of his son Taylor and has suffered, and continues to suffer, severe emotional distress and mental anguish to this day.

180. As a result of the international terrorism that Defendants aided and abetted, Plaintiff Gez has been deprived of the services, society, company, guidance, and companionship of his son Ravid Haim and has been deprived of the same, as well as consortium, with regard to his wife, Tzeela. Plaintiff Gez suffered and continues to suffer severe emotional distress and mental anguish to this day.

181. Furthermore, Plaintiffs seek injunctive relief against Defendants to immediately cease the disbursement of payments under Pay for Slay, insofar as monetary damages are insufficient to compensate the harm suffered by Plaintiffs; that Plaintiffs will likely suffer ongoing harm as a result of the continued payments, a harm that cannot be undone by the granting of monetary relief in a single instance; that monetary relief alone will not halt the payments alleged upon information and belief under Pay for Slay to the family members of those who murdered Plaintiffs' loved ones; and that the United States has an unequivocal interest in halting the Pay for Slay system that incentivizes the injuring and killing of American citizens, such as those whose interests are represented here.

JURY DEMAND

182. Under Fed. R. Civ. P. 38(b), Plaintiffs demand a trial by jury on all claims so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that this Court:

- (a) Enter judgment against Defendants and for each Plaintiff for compensatory damages in amounts to be determined at trial;
- (b) Issue an injunction prohibiting Defendants from disbursing payments to Palestinian terrorists imprisoned in Israel or to the families of Palestinian terrorists killed or injured during or after the commission of a terror attack;
- (c) Enter judgment against Defendants and for each U.S. Plaintiff for treble damages pursuant to 18 U.S.C. § 2333(d)(2), as well as the cost of the suit, including attorneys fees
- (d) Grant such other and further relief as this Court deems just and proper.

Dated: October 16, 2025

Respectfully submitted,
/s/ Susan Greene

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