

May 21, 2015

His Excellency Joseph Blatter
President, Fédération Internationale de Football Association (FIFA)
FIFA-Strasse 20,
Post Office Box 8044
Zurich, Switzerland

Your Excellency:

I am an Israeli attorney and founder of Shurat HaDin, a human-rights organization in Ramat Gan, Israel. I request that you institute disciplinary measures against Jibril Rajoub, President of the Palestinian Football Association, a FIFA member organization. Rajoub has engaged in conduct that is in clear violation of Article 3 of the FIFA Statutes (August, 2014) and of Article 53 of the FIFA Disciplinary Code (2011 ed.). In addition to his role as President of the Palestinian Football Association, Rajoub is Deputy-Secretary of the Central Committee of Fatah.¹ Fatah is the parent organization of the Al-Aqsa Martyrs' Brigades (AAMB). AAMB is a terrorist organization, designated as such by both the United States and the European Union.^{2,3} In violation of the FIFA principles and of the FIFA Disciplinary Code, Rajoub, personally, and in combination with others on the Central Committee of Fatah, actively supports and renders aid to AAMB and engages in public conduct designed to foster discrimination and violence against Jews and Israelis,.

Relevant FIFA standards: Rajoub has breached his obligation, on or off the field, to comply with FIFA standards regarding non-discrimination, non-intimidation and non-violence. See Article 2, FIFA Disciplinary Code (2011 ed.). The relevant standards are:

¹ Adnan Abu Amir, *Hard-line Fatah leader in running to succeed Mahmoud Abbas*, Al-Monitor, July 3, 2014 <http://www.al-monitor.com/pulse/iw/originals/2014/07/palestine-qatar-nominates-rajoub-abbas-president.html#> .

² <http://www.state.gov/j/ct/rls/other/des/123085.htm>; see also Khaled Abu Toameh, *Fatah committed to Aksa Martyrs*, Jerusalem Post, June 20, 2004.

³ 67 Federal Register 14761, Official Journal of the European Union, Sept. 30, 2005

“Non-discrimination and stance against racism: Discrimination of any kind against a Country, private person or group of people on account of race, skin colour, ethnic, national or social origin, gender, language, religion, political opinion or any other opinion, wealth, birth or any other status, sexual orientation or any other reason is strictly prohibited and punishable by suspension or expulsion.”

Article 3, FIFA Statutes (August, 2014).

“Inciting Hatred and Violence:

1. A player or official who publicly incites others to hatred or violence will be sanctioned with match suspension for no less than twelve months and with a minimum fine of CHF 5,000.

2. In serious cases, in particular when the infringement is committed using the mass media (such as the press, radio or television) or if it takes place on a match day in or around a stadium, the minimum fine will be CHF 20,000.”

Article 53, FIFA Disciplinary Code (2011 ed.).

During his tenure in office as President of the Palestinian Football Association, Rajoub has engaged in a pattern of conduct that violates these standards.

Rajoub’s violations: Rajoub is Deputy-Secretary of the Fatah Central Committee, which has control over the activities of AAMB. AAMB is a constituent organization of Fatah. As a high-ranking official within Fatah, Rajoub is responsible for, and has control over, the actions of Fatah and its constituent organizations. For example, finances and payments to Fatah militant organizations and to individual combatants are within the control of the Central Committee of Fatah.⁴ Rajoub is also an *ex officio* member of the Fatah Revolutionary Council, which is responsible for disciplining Fatah members.⁵

During August 2014, while serving as Palestinian Football Association President, Rajoub called for indiscriminate attacks on Israeli civilians. Rajoub stated, *inter alia*: “Fatah has decided that our relations with the Israelis are relations between enemies... OK, brother, here is the occupation, am I stopping you from slaughtering a settlement? No one is stopping anyone. Don’t lie and tell me: ‘the [Palestinian Authority] Security Forces and Mahmoud Abbas,’ and so on [stop you]. Drop it, OK? No one is stopping

⁴ Fatah Charter, Art. 36

⁵ Fatah Constitution, Art. 23(c)

anyone. Our political decision is resistance in the occupied territories in order to bring an end to the occupation [using] **all forms of resistance** (emphasis added).⁶ Assuming, *arguendo*, that Israeli citizens resident in the West Bank are “settlers,” that status does not deprive those individuals of the protections of international humanitarian law. Rather, civilians, irrespective of their status as “settlers,” may not be targeted.⁷ It is beyond question that calling for the slaughter of Jews on the basis of their place of residence is in violation of FIFA standards on non-discrimination and non-violence.

Rajoub routinely discusses, in public fora, his extremist views on the proper means by which the “resistance” referenced above against Israeli civilians should be conducted. According to Rajoub, “[Israel is] our enemy and our battle is against them.” Rajoub stated that in the armed conflict between Israel and Palestinian irregular groups, the “resistance” should be fought by all means, and using all weapons, and that “if we had nuclear weapons, we’d be using them.”⁸ Therefore, Rajoub clearly is aware of the armed conflict between Israel and Palestinian irregular groups.

On September 30, 2014, immediately subsequent to Israel’s Operation Protective Edge, its war with Hamas in Gaza, Rajoub openly praised the “armed resistance” of Gazan militants, who fired 4,229 rockets at Israeli civilian targets that summer.⁹ Rajoub, in combination with other Fatah Central Committee members, has actively encouraged attacks on civilians.

Rajoub’s support for AAMB, a designated terrorist entity that is responsible for the murder and injury of countless Israeli civilians, is longstanding. In March, 2002, Rajoub stated that the group is the “noblest phenomenon in the history of Fatah, because they restored the movement’s honour.”¹⁰ Furthermore, in reference to rocket attacks on Israeli civilians in 2012, Rajoub stated that “we will not return the sword to its sheath until there is a state.”¹¹ Most damningly, Rajoub has stated that Fatah and AAMB have made a “political decision” to support the “slaughtering” of Jews in Judea, Samaria and Eastern Jerusalem.¹² These statements prove that Rajoub’s participation in Fatah and AAMB is with full knowledge and approval of their desire to commit

⁶ Itamar Marcus, *PA leader: Slaughter Jews in "settlements,"* Palestinian Media Watch, Aug. 21, 2014, http://palwatch.org/main.aspx?fi=157&doc_id=12464

⁷ James Stewart, *The UN Commission of Inquiry on Lebanon*, 5 J Int Criminal Justice 1039, 1040 (2007).

⁸ Elior Levy, *Rajoub: Israel should beware, we are enemies*, Ynet News, May 14, 2013, <http://www.ynetnews.com/articles/0,7340,L-4379988,00.html>

⁹ Israel Security Agency, *Monthly Summary*, August 2014, <http://www.shabak.gov.il/English/EnTerrorData/Reports/Pages/Monthly0814.aspx>

¹⁰ Mathew Levitt, *Designating the Al-Aqsa Martyrs Brigades*, The Washington Institute, March 25, 2002, <http://www.washingtoninstitute.org/policy-analysis/view/designating-the-al-aqsa-martyrs-brigades>

¹¹ Itamar Marcus and Nan Jacques Zilberdik, *Fatah glorifies Hamas rockets from Gaza against Israel and supports armed conflict*, PMW Bulletins, Dec 13, 2012, http://palwatch.org/main.aspx?fi=157&doc_id=8157 .

¹² Orly Harari, *Beitar Illit Man Barely Escapes Lynching Attempt*, Arutz Sheva, August 26, 2014, <http://www.israelnationalnews.com/News/News.aspx/184438#.VV3CbfViko>

war crimes, and that Rajoub has participated in the decision-making process to engage in the same.

Rajoub's incitement efforts, during a time when he was simultaneously a high-ranking Fatah official as well as President of the Palestinian Football Association, were successful. Members of Fatah and AAMB responded to Rajoub's incitement during the 2014 conflict with Israel. In July and August, 2014, Fatah and AAMB fired rockets from Gaza into Israeli cities. AAMB's rocket fire was so prolific, sustained and saturating that AAMB exhausted its supply of rockets and is using the current ceasefire to rearm.¹³ Constituent elements of Fatah fired over 2,000 rockets at Israeli civilian targets during the 2014 conflict. AAMB fired 620 rockets over the days of the war, the Abu Nidal Brigades shot 532 rockets and mortars at "the Zionist enemy," and the Abdul Kader Hussein Brigades fired 864 rockets and mortars at Israel.¹⁴

Fatah has not clarified the dates or targets of all the attacks it perpetrated, although this matter is amenable to further investigation. However, a Fatah spokesman publicly claimed responsibility for the following specific attacks:

On July 10, 2014, a Fatah military force launched two Grad rockets and four mortar shells at Kibbutz Nir Or, another location within Israel, and fired 112-mm and 107-mm rockets at Ashkelon, Sderot, Netivot, Kibbutz Ein Hashlosa and the Sufa Crossing from Gaza.^{15,16}

On July 25, 2014, AAMB launched 3 107-mm rockets at Nirim.¹⁷

On July 27, 2014, AAMB's claimed credit for launching 3 model 107 rockets at Kfar Aza.¹⁸

On August 8, 2013, AAMB fired 4 N103 rockets at Ashkelon and 4 107-mm rockets.¹⁹

These attacks were all promoted, supervised and glorified by Rajoub at the same time that he was President of the Palestinian Football Association. To say that such violent, hateful, discriminatory conduct is beneath the high ideals of

¹³ Itamar Marcus and Nan Jacques Zilberdik, *Fatah producing new rockets to replenish supplies for coming wars with "the Zionist enemy,"* Palestinian Media Watch, Sep. 22, 2014, http://www.palwatch.org/main.aspx?fi=157&doc_id=12693

¹⁴ *Mahmoud Abbas's Fatah Terrorists: 'We Shot Over 2,000 Rockets at Israel,'* The Algemeiner, Aug. 28, 2014, <http://www.algemeiner.com/2014/08/28/mahmoud-abbas-fatah-terrorists-we-shot-over-2000-rockets-at-israel/>

¹⁵ Elhanan Miller, *Fatah joins Hamas and Islamic Jihad in missile launches,* Times of Israel, Jul. 10, 2014, available at, <http://www.timesofisrael.com/moderate-fatah-joins-hamas-and-islamic-jihad-in-missile-launches/>

¹⁶ *Id.*

¹⁷ AAMB Communiqués (Jul. 24, 2014), available at <http://www.nedal.net/ar/index.php?Action=NewsDetails&ID=18653>

¹⁸ *Fatah Threatens to "Turn Tel Aviv into Ball of Fire," Glorifies Rockets Against Israel,* States News Service, Jul. 29, 2014

¹⁹ AAMB Communiqué (Aug. 8, 2014), available at <http://www.nedal.net/ar/index.php?Action=NewsDetails&ID=18953>, <http://www.nedal.net/ar/index.php?Action=NewsDetails&ID=18952>

FIFA for peace, sportsmanship and collegiality is to massively understate the obvious.

Jibril Rajoub has no place in FIFA because he has cynically and brazenly flouted FIFA's standards for conduct in Article 3 of the FIFA Statutes (August, 2014) and of Article 53 of the FIFA Disciplinary Code (2011 ed.). I urge you to preserve the impartiality and good name of FIFA and to discipline Rajoub appropriately. Believe me, I am

Yours Very Truly,

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