

Kick Terror out of Football

Complaint by Palestinian Media Watch to the FIFA Disciplinary Committee against:

- 1. The Palestinian Football Association (PFA)**
- 2. PFA President Jibril Rajoub**

For violating the FIFA Statutes and Disciplinary Code by:

- 1. Supporting and glorifying terrorism;**
- 2. Inciting hatred and violence;**
- 3. Promoting racism;**
- 4. Prohibiting the use of football as a bridge for peace**

Preamble:

The Palestinian Football Association [hereinafter: "PFA"] and its president Mr. Jibril Rajoub regularly violate FIFA's Statutes and Disciplinary Code by using **Palestinian football as a vehicle to glorify and honor terrorist murderers; inciting hatred and violence; promoting racism; and prohibiting the use of sports as a bridge for peace** between Palestinians and Israelis.

The above actions are in direct contravention of Articles 3 and 4 of the FIFA Statutes and Articles 53 and 58 of the FIFA Disciplinary Code.

The documentation of the violations cited in this complaint were drawn from the Palestinian media - in most cases the official media of the Palestinian Authority - and were gathered and documented by the research institute Palestinian Media Watch [hereinafter: "PMW"] in its report entitled *The Jibril Rajoub File*. Emphasis, found in some of the texts below, has been added by PMW. The original sources can be found on PMW's website www.palwatch.org.

Details and particulars of the Complaint:

Count No. 1

Glorifying and honoring terrorist murderers – Complaint against the PFA and its president, individually and jointly

Article 3 of the FIFA Statutes states as follows:

"FIFA is committed to respecting all internationally recognized human rights and shall strive to promote the protection of these rights."

Terrorism in all its forms has been severely condemned by the international community. United Nations Security Council Resolution 1624 of Sept. 14, 2005 condemns terror, incitement to terror, and **honoring terrorists**, using the following language:

"Condemning in the strongest terms all acts of terrorism irrespective of their motivation, whenever and by whomsoever committed, as one of the most serious threats to peace and security..."

Condemning also in the strongest terms the incitement of terrorist acts and repudiating attempts at the justification or glorification (apologie) of terrorist acts that may incite further terrorist acts..."

This basic principle is reflected in Article 24 of FIFA's Code of Ethics, which provides as follows:

"Persons bound by this Code shall respect the integrity of others involved. They shall ensure that the personal rights of every individual whom they contact and who is affected by their actions is protected, respected and safeguarded."

Particular severity should be attributed to the PFA and Rajoub's violation of this principle, considering that the breaches were publicized using mass media.

The president of the PFA bares direct responsibility insofar as he himself promotes and glorifies terrorism and/or allows and permits the use of the PFA for promoting and glorifying terrorism and/or does nothing to prevent or condemn the actions of the PFA.

Furthermore, the PFA and its president bare responsibility, by omission, when teams that are members of the PFA honor and glorify terrorism, even without

direct involvement of the PFA or Mr. Rajoub, by failing to publicly denounce these activities and take disciplinary measures against the offenders.

Glorifying and honoring terrorists in general, and specifically glorifying a terrorist who planned the murder of innocent civilians and at least 12 minors, is a clear breach of FIFA's commitment to respect universal human rights and is a flagrant breach of FIFA's Statutes and Code of Ethics.

Evidence supporting this section of the complaint

Palestinian Media Watch has documented numerous actions and events performed or organized by the PFA in which terrorism was promoted and/or glorified. Hereinafter we will detail the different instances, as reported by the Palestinian media.

Part A: The PFA

The PFA supervises an **annual football tournament** named after the terrorist **Abu Jihad**. "Abu Jihad" refers to Khalil Al-Wazir, one of the founders of the Palestinian Liberation Organization. By the Palestinian Authority's own calculations, Abu Jihad was **responsible for the murder of 125 people** in a series of terror attacks, which include a 1978 bus hijacking in which 25 adults and the 12 children pictured below were murdered:



Galit Ankwa (2) Yoav Meshkel (6) Yitzhak Ankwa (10) Liat Gal-On (6) Tali Aharonovitch (14) Naomi Elichai (18)



Ilan Hohman (3) Roi Hohman (6) Erez Alfred (5) Mordechai Zit (9) Naama Hadani (5) Omry Tel-Oren (14)

[\[http://www.palwatch.org/main.aspx?fi=157&doc_id=6791\]](http://www.palwatch.org/main.aspx?fi=157&doc_id=6791)

The events at which "Abu Jihad" was honored and glorified with the direct involvement of the PFA are as follows.

- a) On April 23, 2016, the official PA daily *Al-Hayat Al-Jadida* reported as follows:

Headline: **“The 22nd Prince of Martyrs Abu Jihad Futsal (indoor football) Tournament”** ...organized by the Al-Ansar Club, which has organized it continuously since 1995, for the 28th anniversary of the death of commander Khalil Al-Wazir (Abu Jihad), **under the supervision of the [Palestinian] Football Association’s central branch.** The tournament will be held next Friday morning”

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=18792]

- b) This tournament, as mentioned in the article, is not the first such football event held under the auspices of the PFA, but rather an annual event that has recurred since 1995.

On May 1, 2016, the official PA daily *Al-Hayat Al-Jadida* reported:



“The Jerusalem Al-Ansar Club successfully concluded the 22nd Khalil Al-Wazir ‘Abu Jihad’¹ Football Tournament for young people born in 1995, which was efficiently and well organized on the grounds of the Burj Luq Luq Society. Fourteen Jerusalem clubs participated in the tournament, and it was held under the auspices of the Jerusalem Clubs Association, in the framework of its program that is funded by the Pontifical Mission.”

[http://www.palwatch.org/main.aspx?fi=157&doc_id=17839]

- c) A year earlier, on April 14, 2015, the official PA daily *Al-Hayat Al-Jadida* reported as follows:

¹ For details of the terrorist activities attributed to "Abu Jihad" see opening text.

Headline: “The Ansar Al-Quds Club is preparing to hold the 21st football championship named after Abu Jihad”

“As is its custom since 1995, the Ansar Al-Quds Club is organizing the football championship named after the Prince of Martyrs (*Shahids*), Khalil Al-Wazir Abu Jihad. The club began the preparations for the 21st championship and the distribution of invitations to all the Jerusalem clubs. The championship will take place on Friday, April 24, 2015, at the Burj Luq Luq fields in the Old City [of Jerusalem], through the futsal method, [and it is meant] for players born in 1996 or later (i.e., 19 and under)...

The championship will be held under the supervision of the central branch of the [Palestinian] Football Association.”

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=2006]

- d) Similarly, the official PA daily *Al-Hayat Al-Jadida* reported on May 16, 2014:

“The 20th Youth Football Tournament [named after] the Prince of Martyrs (*Shahids*), Khalil Al-Wazir ‘Abu Jihad’², will begin this morning on the fields of Beit Safafa and the Silwan school, attended by 14 Jerusalem [football] clubs, **supervised by the Central Branch of the [Palestinian] Football Association** and sponsored by Abu Rabbah Al-Qawasmi and athlete Khamis Dkeidek. The championship that was established in 1995 is entering its twentieth consecutive year. It is generally held on the anniversary of the death as a Martyr of leader Khalil Al-Wazir in 1988 in Tunis. This championship, which is considered one of the most successful local tournaments, is the only one that has continued consecutively... **The list of honor of those responsible for the championship and its supervisors is packed with many names that have been connected to this tournament for years. The most prominent among them is Khaled Al-Sayyad, who supervised all of the previous tournaments as the representative of successive support committees of the [Palestinian] Football Association. After him [on the list] the central branch of the [Palestinian Football] Association [is honored].”**

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=1171]

Part B: The President of the PFA, Mr. Jibril Rajoub

The actions of the PFA reflect the views and opinions of its president, Mr. Jibril Rajoub, who also holds the following positions: Fatah Central Committee

² For details of the terrorist activities attributed to "Abu Jihad" see opening text.

Secretary, Head of the Supreme Council for Sport and Youth Affairs, Chairman of the Palestine Olympic Committee, and Chairman of the Palestinian Scout Association.

Mr. Rajoub is outspoken in his promotion and glorification of terrorists and terrorism. Mr. Rajoub has honored terrorist murderers, calling them "sacred." The following examples are evidence of Mr. Rajoub's repeated support and glorification of terror over years, starting with his honoring murderers of civilians as heroes, and ending with his active promotion and glorification of the recent terror wave in Israel in which 40 people were murdered:

a) On Aug. 16, 2015, Mr. Rajoub stated on official PA TV:

"I was at Al-Quds University on Student Day. Someone asked me: 'Who is Laila Khaled?' (i.e., plane hijacker). So I spoke about Laila Khaled³, **the fighter, the hero, the symbol**, etc.... I told them: **'There are three sacred things that should not be maligned - the fighter, the Martyr, and the prisoner.** They are sacred. We should always speak positively about them, whether they are from the PFLP, Fatah, Hamas, etc.'"

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=15770]
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b) On Nov. 20, 2013, the official PA daily *Al-Hayat Al-Jadida* reported that Mr. Rajoub attended an event held by the Halhul Municipality in honor of released terrorists. A photo published on the same day in the independent Palestinian news agency *Donia Al-Watan* showed him awarding plaques to three terrorist murderers: Ziyad Mahmoud Ghneimat, Mustafa Ghneimat, and Najeh Muqbil.⁴

³Laila Khaled - a PFLP terrorist who participated in the hijacking of TWA flight 840 from Rome to Athens on Aug. 29, 1969 and the hijacking of El Al flight 219 from Amsterdam to New York on Sept. 6, 1970. The second hijacking was averted by the pilot and security personnel on board. They shot Khaled's accomplice, Patrick Argüello, who had murdered one of the flight attendants. Khaled was overpowered and the plane landed in London, where Khaled was handed over and held by British police until she was exchanged on Oct. 1, 1970 for hostages held by the PFLP.

⁴Ziyad Mahmoud Ghneimat and Mustafa Ghneimat were each serving a life sentence for shooting and murdering 2 Israeli citizens, Meir Ben Yair and Michal Cohen, in a forest on June 27, 1985. Najeh Muqbil is a Fatah terrorist who was serving a 38-year-sentence for participating in stabbing and murdering his employer, Israeli citizen Yaacov Shalom, on May 20, 1990. The three were released in Oct. 2013, as part of the 104 terrorists whom Israel agreed to release to fulfill the PA's precondition for renewing negotiations.



[http://www.palwatch.org/pages/news_archive.aspx?doc_id=10798]

- c) Mr. Rajoub honored Palestinian terrorist Ahmad Jabarah "Abu Sukkar," who planned and executed a bombing attack in 1975 in which a refrigerator filled with explosives was detonated in the center of Jerusalem. 15 people were killed and over 60 people were wounded. Mr. Rajoub eulogized the terrorist after his death in 2013, promising "to continue his way of struggle."

As Ma'an independent Palestinian news agency reported on July 17, 2013:

"Secretary-General of the Supreme Council for Youth and Sports, Chairman of the Palestinian Olympic Committee **and Chairman of the Palestinian Football Association**, Jibril Rajoub, eulogized veteran released prisoner, fighter Ahmad Jabarah Abu Sukkar: "Ahmad Jabarah Abu Sukkar... Before his pure soul, we emphasize our adherence to the principles and goals that he dedicated his long life to protect. Before Allah and our magnificent nation, we commit to continue his way of struggle, the way of the esteemed Martyrs (*Shahids*)."

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=9418]

Two months later, Mr. Rajoub again glorified this same murderer of 15 as a "hero," "beacon" and "giant" in a speech broadcast on official PA TV on Sept. 26, 2013. This time, Mr. Rajoub was also speaking as a representative of PA President Mahmoud Abbas:



Moderator: “The speech of President Mahmoud Abbas will be delivered by Jibril Rajoub, member of Fatah’s Central Committee.”

Rajoub: “Abu Sukkar, the legend who walked on earth, Abu Sukkar, who with the sweat of his brow, with his faith, with his sincere belonging outlined a path for us and wrote a page [of history] that is unforgettable and indescribable... Believe me that Abu Sukkar is worthy of being named the most noble among the noble [prisoners] because he is Abu Sukkar. To the people of [village] Turmus Ayya and to Abu Sukkar’s family, I say: ‘You lost a hero, but we, Abu Sukkar’s comrades... in Fatah and in the Palestinian National Movement, lost a beacon...’ Abu Sukkar lived as a giant and died as a giant.He should remain in our hearts with this glory, this greatness...”

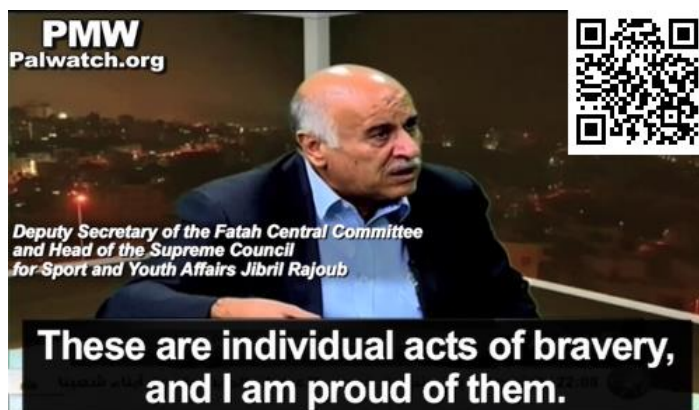
[http://www.palwatch.org/pages/news_archive.aspx?doc_id=9834]

Mr. Rajoub's glorification and honoring of Palestinian terrorists continued and intensified during the most recent wave of Palestinian terror attacks that took place from Sept. 2015 to mid-2016, in the course of which 40 people were murdered (36 Israelis, 1 Palestinian, 2 Americans, and 1 Eritrean) and dozens of others were wounded. The following are some examples of Mr. Rajoub's promotion and glorification of terrorism and terrorists during that period:

- a) In October 2015, just after the wave of terrorism started, instead of using his influence to calm the murderous atmosphere, Mr. Rajoub chose to promote and glorify terrorism and terrorists.

In an interview broadcast on official PA TV on Oct. 17, 2015, Mr. Rajoub, referring directly to the terrorists, *inter alia*, said:

"These 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."



[http://www.palwatch.org/pages/news_archive.aspx?doc_id=16434]

- b) In December 2015, Rajoub sponsored a sporting event named after terrorist Muhannad Halabi, a 19-year-old Palestinian who stabbed 2 Israelis to death.

Ma'an independent Palestinian news agency reported on Dec. 19, 2015:

"Vice President of the Palestine Table Tennis Association, Radwan Al-Sharif, crowned the Hebron Al-Ahli Club team as the Palestine

Cup Champion for 2015 – the Martyr (*Shahid*) Muhannad Halabi⁵ Tournament... **The championship was held on Friday under the patronage of Jibril Rajoub, head of the Palestine Olympic Committee... in Bethlehem.**

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=16899

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The picture accompanying the article shows Palestinian athletes standing next to the banner of the tournament, which displays the picture of the murderer Halabi on the left and right. The words on the banner read:

**“Under patronage of the leader Jibril Rajoub,
head of the Palestine Olympic Committee
Palestine Cup – Martyr Muhannad Halabi
Table Tennis Tournament 2015”**



Both the banner and the article identified Rajoub as the sponsor of the event.

- c) On Jan. 6, 2016, Mr. Rajoub appeared on official PA TV and on Fatah-run Awdah TV to “bless and encourage” the terrorists, again defining murderers as “heroes”:

“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... beginning

⁵ On Oct. 3, 2015, Palestinian terrorist Muhannad Halabi, 19, attacked Israeli citizen Aharon Bennet, 21, and his family, who were on their way back from prayer at the Western Wall through the Old City of Jerusalem. The terrorist killed Aharon and Israeli citizen Nehemia Lavi, who came to the family's aid, and injured Aharon's wife and 2-year-old son. Following the attack, the terrorist was shot and killed by Israeli security forces. Prior to his attack, in a post to his private Facebook page, the terrorist celebrated the recent terror attacks as part of a "third Intifada."

with our brother Muhannad Halabi (who murdered 2 in Jerusalem – Ed.)..."

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=17502]

Part C: The PFA and its President - Culpability by Omission

In its capacity as the regulatory body for football played in the territories governed by the Palestinian Authority, the PFA and its president are beholden to ensure that they not only respect and adhere to the FIFA Statutes and codes⁶, but also that any football activity undertaken by its member clubs that breach the FIFA Statutes and Disciplinary and Ethics Codes are **positively condemned** and that the perpetrators are **accordingly sanctioned**. **Furthermore, Jibril Rajoub, is also the Head of the Supreme Council for Sport and Youth Affairs in the Palestinian Authority, giving him broad powers and responsibility over Palestinian sport activities in general.**

However, as shown above, the PFA and its president themselves honor and glorify terrorists, and thus it not surprising that concurrent with their actions, many other Palestinian football tournaments and events promoted and glorified terrorism by naming participating teams after terrorists, as can be shown by the following examples of sporting events, both of PFA-affiliated teams and of others whose affiliation is unclear:

- a) On Oct. 27, 2013, the official PA daily *Al-Hayat Al-Jadida* reported as follows:

"The Martyr (*Shahid*) Mahmoud Tamouni [football] team was crowned as champion of the [football] tournament named after him...

The following are the results of the matches: The **Martyr Ziyad Da'as**⁷ (i.e., planner and participant in murderous terror attacks) team defeated the Martyr Fidaa Al-Tirawi team 1-2. The Martyr Mahmoud Tamouni team defeated the Martyr Suleiman Al-Jayyusi team 1-3... [Games and scores are listed.] At the end of the special tournament, the heroic Martyrs who fulfilled their duty to the homeland were honored. Muhammad Tamouni, brother of Martyr Mahmoud Tamouni, handed out the tournament prizes... **Tamouni**

⁶ See article 14(d) of the FIFA Statutes

⁷Ziyad Da'as was a commander of the Tanzim (Fatah terror faction) and the planner of an attack at a private Bat Mitzva celebration in Hadera on Jan. 17, 2002, in which a terrorist shot and killed 6 and wounded dozens. Da'as also participated in the kidnapping and murder of Etgar Zeituni and Motti Dayan in Tulkarem in January 2001.

said that this tournament will continue to take place annually in order to remember the heroes, whom we will never forget."

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=10135

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- b) On April 28, 2014, the official PA daily *Al-Hayat Al-Jadida* reported on a sports team named after the planner of the Olympic Massacre of Israeli athletes, as follows:

"The Jalazone Refugee Camp Martyrs' (*Shahids*) Internal Football Tournament, [which was held] under the patronage of District Governor of Ramallah and El-Bireh Laila Ghannam, ended two days ago. [The tournament] was organized, for the second consecutive year, by the Taqat Shababiya organization in the refugee camp...

Nine teams, both from the camp and from outside it, participated in the tournament...The camp's Martyr teams advanced to the second round: the **Martyr Abu Iyad**⁸ (i.e., planner of the Olympic Massacre) team, the **Martyr Abu Jihad**⁹ (i.e., planner of terror attacks killing 125) team and the Martyr Yasser Arafat team."

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=11710

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- c) On Oct. 10, 2014, the official PA daily *Al-Hayat Al-Jadida* reported as follows:

"The Tapuach municipality organized a football tournament including eight teams made up of young men from the village of Tapuach. The teams were named after Martyrs (*Shahids*) from the village and from among the leaders of the [Palestinian] factions. Here are the [names of the] teams: the Martyr Yasser Arafat team, the **Martyr Ahmad Yassin**¹⁰ (i.e., leader of Hamas terror organization, responsible for deaths of hundreds in suicide bombings and other terrorist attacks) team, the **Martyr Abu Ali Mustafa**¹¹ team, the **Martyr Abu Jihad**¹² (i.e., planner of terror

⁸ Abu Iyad (Salah Khalaf) - One of the founders of Fatah and head of the terror organization "Black September" Attacks he planned include the murder of 11 Israeli athletes at the Munich Olympics (Sept. 5, 1972) and the murder of 2 American diplomats in Sudan (March 1, 1973). It is commonly assumed that his assassin, a former Fatah bodyguard, was sent by the Abu Nidal Organization, a rival Palestinian faction.

⁹ For details of the terrorist activities attributed to "Abu Jihad" see opening text.

¹⁰ Sheikh Ahmed Yassin – Founder and former head of the terrorist organization Hamas. The Hamas movement is responsible for numerous terror attacks and the deaths of hundreds of Israeli civilians in suicide bombings.

¹¹ Abu Ali Mustafa - General Secretary of the terror organization Popular Front for the Liberation of Palestine (PFLP). He planned numerous terror attacks against Israeli civilians during the Palestinian terror campaign.

¹² For details of the terrorist activities attributed to "Abu Jihad" see opening text.

attacks killing 125) team, the **Martyr Fathi Shaqaqi**¹³ (i.e., leader of terror organization) team, the Martyr Abd Al-Karim Salameh Al-Taradeh team, the Martyr Hijazi Arzekat team and the Martyr Walid Khamaiseh team... [t]ournament organizer Omar Arzekat and the executive committee [of the tournament] thanked the Tapuach municipality, represented by its director and members, for sponsoring and organizing the tournament."

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=13504]
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- d) On Nov. 2, 2015, the official PA daily *Al-Hayat Al-Jadida* reported as follows:

Headline: "Bal'a Club wins the Martyr Halabi cup for football"
"The Martyr Yasser Arafat Youth Center (Al-Attara - Jenin) succeeded in organizing the first football tournament named after Martyr (*Shahid*) Muhannad Halabi¹⁴ (i.e., murderer of two), which took place on its football fields. The final game was played by the Yasser Arafat Youth Center and Bal'a, which rightly won the title."

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=16135]
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- e) On Nov. 20, 2015, the official PA daily *Al-Hayat Al-Jadida* reported as follows:

Headline: "The Veteran' [Club] named the Palestinian Goalkeepers' Academy after **Martyr Basel Sidr**¹⁵"
"Out of loyalty to the blood of the mighty Martyrs (*Shahids*), and out of love for the loyal club members, who died as Martyrs and were arrested recently while defending Jerusalem and the holy sites, the Shabab Al-Khalil Club took upon itself to name the [Goalkeepers'] Academy after Martyr Basel Sidr, may Allah have mercy on him, who was one of the most devout fans of the club."

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=16387]
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¹³Fathi Shaqaqi - Founder of the terrorist organization Islamic Jihad, which has carried out more than 1,000 terror attacks, killing and wounding hundreds of Israeli civilians.

¹⁴ For details regarding the terrorist Muhannad Halabi, see fn. 5 supra.

¹⁵ Basel Sidr was a 19-year-old Palestinian terrorist who attempted to stab Israeli border policemen near Damascus Gate in the Old City of Jerusalem on Oct. 14, 2015. Sidr was shot and killed by the police when he tried to escape.

- f) On Nov. 23, 2015, the official PA daily *Al-Hayat Al-Jadida* reported on a football tournament named after a 13-year-old Palestinian who stabbed a 13-year-old Israeli boy in the neck and nearly murdered him, as follows:

Headline: “Al-Khatib School’s team won the football tournament named after prisoner **Manasrah**¹⁶”

“The Al-Khatib School’s team won the Ahmad Manasrah Football Tournament, which was held two days ago [Nov. 21, 2015] on the sport fields of the Dar Al-Maarefa [Boys’] School in El-Bireh, in which many schools from the Ramallah and El-Bireh district participated.”



[http://www.palwatch.org/pages/news_archive.aspx?doc_id=16389

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- g) On Feb. 6, 2016, the official PA daily *Al-Hayat Al-Jadida* reported as follows:

Headline: “The Qabatiya [Sport] Club expresses grief over the death of the three Martyrs”

“The Qabatiya [Sport] Club issued a notice in which it expressed grief over the death of the three Martyrs (*Shahids*) who died in Jerusalem, and they are: **[football] team captain Muhammad Halami Kmeil, Ahmad Zakarneh**¹⁷, **one of the team’s outstanding fans, and Ahmad Abu Al-Rub**. The notice added that the [football] player Kmeil was an example of a player who is devoted to the club, loves sport, and has high morals. The club’s administration requested that Supreme Almighty Allah have mercy on them and let them into Paradise together with all the homeland’s Martyrs.”

¹⁶ On Oct. 12, 2015, two Palestinian terrorists, cousins Hassan Manasrah (15) and Ahmad Manasrah (13), stabbed Yossef Ben Shalom (21) in the Pisgat Ze’ev neighborhood in northeastern Jerusalem, and then repeatedly stabbed Naor Ben Ezra (13) who was riding his bike. Both victims were seriously injured. Hassan Manasrah was killed while fleeing the scene, and Ahmad Manasrah was shot by Israeli police, arrested, and hospitalized. Ahmad Manasrah is serving 12 years in prison for two counts of attempted murder.

¹⁷ Ahmad Najah Abu Al-Rub, Ahmad Zakarneh and Muhammad Kmeil - Three Palestinian terrorists in their early 20’s who shot and stabbed two Israeli police officers at the Damascus Gate in Jerusalem on Feb. 3, 2016, murdering 19-year-old Hadar Cohen. The second officer was seriously wounded. The terrorists attacked the policewomen after they were asked for identification. They carried machine guns, knives, and pipe bombs, leading the police to suspect they were planning a mass attack against civilians.

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=17893]
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- h) On Jun. 7, 2016, the official PA daily *Al-Hayat Al-Jadida* reported as follows:



Headline: "The Al-Amid [Club] (i.e., Shabab Al-Khalil) beat the Al-Ghazalan [Club] (i.e., Al-Dhahiriya) 5-0 in the **Martyr [Basel] Sidr**¹⁸ Cup"

"The Al-Hussein Stadium in Hebron hosted the Shabab Al-Khalil Ultras' (i.e., fanatical fan group) Martyr Basel Sidr Cup on Sunday evening [June 5, 2016]. The youth teams Shabab Al-Khalil and Al-Dhahiriya participated in the game, exhibiting a promising show of football that ended in a 5-0 victory for Shabab Al-Khalil."

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=19256]
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- i) On Oct. 11, 2016, the Al-Mashreq, independent Palestinian electronic newspaper reported as follows:

Headline: "How did Hilal Al-Quds express solidarity with the Lion of Jerusalem, Martyr Musbah Abu Sbeih¹⁹ (i.e., murderer of two)?"

¹⁸ See fn. 14 supra

¹⁹ Musbah Abu Sbeih – 39-year-old Palestinian terrorist who murdered 2 Israelis and wounded 5 others in 3 drive-by shooting attacks in Jerusalem on Oct. 9, 2016. Abu Sbeih, who held Israeli residency status, began his shooting spree at the Ammunition Hill light rail stop and continued to the Shimon Hatzadik neighborhood. He was killed in an exchange of fire with Israeli police. On his Facebook page, Abu Sbeih praised terror groups including Hamas as well as terrorists who carried out attacks and called for attacks against Israelis.



The article includes a picture that shows the Hilal Al-Quds football team holding a banner honoring Palestinian terrorist Musbah Abu Sbeih, who murdered 2 Israelis and wounded 5 others in three drive-by shooting attacks in Jerusalem on Oct. 9, 2016.

Text on banner: "The Hilal Al-Quds Club mourns the Lion of Al-Aqsa, Martyr (*Shahid*) Musbah Abu Sbeih 'Abu Al-Izz'"
[http://www.palwatch.org/pages/news_archive.aspx?doc_id=19333]

The examples of sporting events dedicated to terrorists show an unquestionable pattern whereby the PFA and its president, Mr. Jibril Rajoub, who is also Head of the Supreme Council for Sport and Youth Affairs, actively and/or by omission, promote and glorify terrorism and terrorists.

Glorifying terrorists and naming sporting events after terrorist murderers is a fundamental human rights violation insofar as it encourages youth and adults alike to see murderers as role models and to emulate them. Such actions directly deny the basic Right to Life of the victims of the acts of terrorism.

Interim summary

As documented above, over an extended period of time, jointly and individually, the PFA and its president, Mr. Jibril Rajoub, have promoted terrorism, glorified terrorists, supervised and sponsored sporting events named after murderers, and failed to condemn and sanction similar use of football and sports to glorify and honor terrorist murderers. These actions and omissions have taken

different forms, including Rajoub calling terrorist murderers "beacons" and "heroes" and actively "encouraging" terror murder during the height of the recent terror wave.

By promoting terror and glorifying Palestinian terrorists who targeted civilians, *per se*, the PFA and its president have shown a willful disregard for the human rights of the victims of the terrorists, which, as is the nature of terrorism, claimed the lives of civilians, thereby breaching, *inter alia*, Article 3 of the FIFA Statutes.

Count No. 2

Inciting hatred and violence - Complaint against the PFA President

Article 53 of the FIFA Disciplinary Code provides as follows:

"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."

In his capacity as president of the PFA, Mr. Rajoub has not only glorified terrorists, but also incited to hatred and violence, in general, and specifically at a time when Palestinian terrorism raged during the period spanning from Oct. 2015 through much of 2016.

It is clear that when the president of a football association that is a member of FIFA incites hatred and violence, he is not only fundamentally breaching the most basic provisions of human dignity, but also committing a breach of FIFA's Statutes and Disciplinary Code.

Particular severity should be attached to this violation, since much of Mr. Rajoub's incitement to hatred and violence was **conveyed using mass media**.

Evidence supporting this section of the complaint

Mr. Rajoub has consistently promoted violence. Significantly, Mr. Rajoub has insisted that the Palestinian terror organization Hamas save its weapons for joining forces with the Fatah Movement in future "battle" against Israel. Rajoub

has regularly promoted violence and terror as an integral component of the Palestinian strategy against Israel.

It should be remembered that Mr. Rajoub is himself a convicted terrorist who was sentenced to life in prison for throwing a grenade at an Israeli army truck in 1970. Mr. Rajoub served 15 years of his sentence before he was released in a prisoner exchange. Rajoub's behavior shows him to be unrepentant.

Mr. Rajoub's incitement to hatred and violence is not new, as he is on record saying **that killing Israelis is legitimate:**

Mr. Rajoub said in an interview on PA TV on Nov. 5, 2012:

“No one has removed the rifle from the equation”. He continued to say: “This is a popular struggle. We still believe in all forms of the struggle. **No one has removed the rifle from the equation.** However, for us, the struggle is a means, and the end is freedom and independence.”



[http://www.palwatch.org/pages/news_archive.aspx?doc_id=8181]

The following are additional examples of Mr. Rajoub's public incitement to hatred and violence.

- a) On Sept. 30, 2014, in an interview on official PA TV, Mr. Rajoub called on the Palestinian terror organization Hamas to store its weapons until the proper time to use them to attack Israelis: **"The weapon of the resistance is sacred... we will all fight together"**



"They [Hamas] tell you: 'The weapon of the resistance'. Brother [Hamas], your weapon, the weapon of the resistance, is sacred to us. We will not harm it, go after it, or keep track of it. But could you store it away? **At the moment of truth, we will all enlist together, we will all fight together.**"

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=12866]

- b) Just a few days later, on Oct. 3, 2014, the newspaper *Al-Quds* reported as follows:

"Jibril Rajoub stressed that the Palestinian leadership had decided to close the subject of bilateral relations with the occupation... **Rajoub stressed that [although] the Palestinian leadership would not oppose the weapons of the resistance, 'they must remain in storage, without military demonstrations in the streets, and when there is an attack, the battle will be one in all the Palestinian territories, in which all members of the Palestinian people will participate.'**"

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=12867

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- c) Mr. Rajoub, representing PA Chairman Abbas, **saluted the terrorists who captured [Israeli soldier] Gilad Shalit and encouraged similar terrorist attacks.**

In Oct. 2011, the Israeli government agreed to release 1,027 Palestinian prisoners from Israeli prison in exchange for Israeli soldier Gilad Shalit, who had been held hostage by the Hamas terrorist organization for more than five years.

At the ceremony honoring the released terrorists, broadcast on official PA TV, on Oct. 30, 2011, Mr. Rajoub said:



Jibril Rajoub: "I say in the name of the Fatah Movement -- we salute those who dug the tunnel [to capture the Israeli soldier]; we salute those who captured the captive [Gilad Shalit], and salute those who guarded the captive until this deal was completed."

[http://www.palwatch.org/main.aspx?fi=981&doc_id=5801]

Continuing this malicious trend, in an interview broadcast on official PA TV on Jan. 2, 2014, Mr. Rajoub expressed further **support for the Hamas policy of kidnapping Israeli soldiers as a means to bring about the release of other Palestinian terrorists.**



"If Hamas wants to kidnap soldiers, let them kidnap soldiers. Let them kidnap. Let them kidnap if they [the Israelis] don't want to release prisoners, but want them as prisoners forever, so [the prisoners] will come out as ghosts and skeletons. The Israelis need to understand. It's clear that kidnapping is the language they understand. On the contrary, we encourage them [Hamas]. When they kidnapped [Israeli soldier Gilad] Shalit, we congratulated them. When they concluded the Shalit

[exchange] deal, in spite of our having a few reservations about it, we also congratulated them."

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=10818]
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Shortly after this broadcast, Hamas terrorists from Hebron started planning the kidnapping of Israelis. Their plan was carried out on June 12, 2014, when Marwan Al-Qawasmī and Amer Abu Aisheh kidnapped and murdered Eyal Yifrach, 19, Gilad Shaar, 16, and Naftali Frenkel, 16.

- d) In an interview on official PA TV, broadcast on Jan. 2, 2016, Mr. Rajoub expressed his support for the attacks that took place during the terror wave of 2015-2016, saying:

"Yesterday in Hebron, they escorted 17²⁰ 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** 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.**"



²⁰The 17 "Martyrs" brought for burial included terrorist murderers.



[http://www.palwatch.org/pages/news_archive.aspx?doc_id=16858]

- e) Most significantly, Mr. Rajoub was very calculating in the terror he supported, calling on Palestinians **to murder only individuals** and not to commit suicide bombings on busses in Tel Aviv.

In an interview broadcast on official PA TV on Oct. 17, 2015, Mr. Rajoub explained:

"The international community does not agree to a bus exploding in Tel Aviv. But the international community does not ask what happens to a settler or soldier in the occupied territories at the wrong time and in the wrong place. No one asks about him! Therefore, we want to fight in a way that the world and the international community will remain by our side."

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=16434

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Interim summary

By claiming that **the murder of Israelis is legitimate**, and that the use of weapons by the Hamas terrorist organization to further the goal of terrorism should be coordinated with Fatah, Rajoub laid the foundation for his incitement to hatred and violence. When these already malicious statements were compounded by **concrete calls for kidnapping Israelis, encouraging and supporting future acts of terrorism, and justifying murders**, Mr. Rajoub was in direct breach of Article 53 of the FIFA Disciplinary Code. These breaches were multiple and compounded by the fact that they were broadcast, with his prior knowledge and consent, via the mass media.

Count No. 3

Active discrimination, including Racism, and Prohibiting the use of the game of football as a bridge to peace - Complaint against the PFA and its president

Article 4 of the FIFA Statutes states as follows:

"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, disability, 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 58(1)(a) of the FIFA Disciplinary Code further provides:

Anyone who offends the dignity of a person or group of persons through contemptuous, discriminatory or denigratory words or actions concerning race, colour, language, religion or origin shall be suspended for at least five matches. Furthermore, a stadium ban and a fine of at least CHF 20,000 shall be imposed. If the perpetrator is an official, the fine shall be at least CHF 30,000.

One of the foundation stones of the game of football and of FIFA is that the game transcends prejudice of any and all kinds. FIFA claims to be "For the Game. For the World."

In stark contrast to this lofty goal, the PFA and its president, Mr. Jibril Rajoub, openly deny the right of Israel to exist as a Jewish state and prohibit any peacebuilding venture that could be considered normalization between Palestinians and Israelis.

When Israeli and Palestinian youth play together, traditional barriers can be swept away. The power of the game is such that even children directly affected by hostilities are able to set aside their misgivings, as in the example cited below. Football games can, and should be, organized in order to bring all parties to a better understanding of others.

However, the PFA and its president, Mr. Jibril Rajoub, refuse to allow any normalization, to the point where those who participate in peacebuilding activities are considered criminals and threatened with sanctions.

Additionally, Mr. Rajoub has used derogatory and racist terminology when referring to Jews, often adopting terminology comparing Jews to "Satan" and to the Nazis.

In so doing, the PFA and its president are in fundamental breach of Article 4 of the FIFA Statutes and in breach of Article 58(1)(a) of the FIFA Disciplinary Code.

Evidence of breach of these provisions

The Palestinian Football Association violates FIFA's Statutes by prohibiting any contact with Israeli athletes and prohibiting the use of sport for peacebuilding with Israel. This position has been expressed on several occasions in different contexts, as demonstrated by the following examples:

- a) On July 21, 2011, the official PA daily *Al-Hayat Al-Jadida* quoted Abd Al-Majid Hujjah, then **Secretary-General of the Palestinian Football Association**, saying:

"Hujjah said that the position of the **Palestinian Football Association** on the issue of normalization [with Israel] in sports has been well-known for a long time, having been publicized, officially, on more than one occasion. This position has been disseminated among everyone involved. He denied the existence of any connection between **the Palestinian Football Association and any activity related to the Israeli side.**"

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=5948]

- b) After the Gaza War in 2014, on Sept. 3, 2014, the official PA daily *Al-Hayat Al-Jadida* reprinted an article first published by *Agence France – Presse* reporting that Palestinian and Israeli children participated in friendly football matches organized by the Israeli organization Peres Center for Peace. The event was successful and achieved sincere peace-building:

"[Israeli] Ofer, 11, from Sderot, a town in southern Israel where many rockets had landed, said: 'It's great to come back here and enjoy our time, after weeks of being stuck at home during the war.' And [Palestinian] Qusai, 11, said: 'I love it when we play together like this. I hope that one day there will be peace between Arabs and Jews and that there will be no more wars and death.'"

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=12629]

On the same day (Sept. 3, 2014), Sama, an independent Palestinian news agency, reported the response of the Palestine Olympic Committee to this peace-building activity:

“Abd Al-Salam Haniyeh, a Palestine Olympic Committee member, denounced the match held between Palestinian and Israeli children. He considered it a crime and an unpatriotic and immoral act...Haniyeh said these matches are completely unacceptable to the sports community, the Olympic Committee, the Supreme Council for Sport and Youth Affairs and the Palestinian Football Association...Haniyeh demanded that Chairman of the Palestinian Football Association Jibril Rajoub immediately interrogate the [Palestinian] organizers of the match, settle the account with them and prosecute them on charges of serious treason.”

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=12637]

On Sept. 8, 2014, the official PA daily *Al-Hayat Al-Jadida* reported and Mr. Rajoub posted on his personal Facebook page that he himself condemned this peace-building match for children and all other peacebuilding football matches as **“a crime against humanity”**:

Headline: "Rajoub: 'Normalization in sports with the Zionist occupation is a crime"

"Chairman of the Olympic Committee, and Chairman of the [Palestinian] Football Association **Jibril Rajoub said any activity of normalization in sports with the Zionist enemy is a crime against humanity.** He said that the position of the sports leadership on the issue is perfectly clear.

Rajoub's statements were made in response to a sports activity held a few days ago (i.e., between Palestinian and Israeli children sponsored by the Israeli Peres Center for Peace)... **[Rajoub said] 'I demand that all individuals and institutions distance themselves from such activities, especially because their recurrence would arouse disgust and aversion towards all members of the [Palestinian] sports community."**

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=12633

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Since Mr. Rajoub is well aware that prohibiting the use of sports to build peace violates a fundamental principle of FIFA and of international sports in general, he attempts to hide this ideology when communicating with FIFA and with other international sports leaders. One prime example of Mr. Rajoub's duplicity was his words to Mr. Joseph Blatter, then-president of FIFA, as printed in the

original English in the official PA daily *Al-Hayat Al-Jadida* on July 7, 2013. On this occasion, he stated that sports can "bridge the gaps between peoples":

"It is my great honor and pleasure to warmly welcome Palestine's esteemed guest, Mr. Joseph Blatter, President of FIFA, on behalf of the Palestine's sports community... We definitely believe that presenting Palestine through sports and practicing different sport games by youth, along with your boundless encouragement and enforcement have made it more possible for Palestine to realize its desired goals and aspire (sic., inspire) its promising youth with new expectations and dreams; such youth that strongly believes in **the noble values and humane message of sports which can bridge the gaps between peoples** and help in achieving their expectations and aspirations; this is a hope that we will not give up until the last moment!"

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=9343]

Notwithstanding this opaque attempt to find favor in the eyes of the then-president of FIFA, Joseph Blatter, Mr. Rajoub expressed his true sentiments and policy on official PA TV on July 1, 2013 (just days before he welcomed Mr. Blatter), when he threatened to expel anyone from the PA football team who engages in joint sports activities with Israelis:

"This state [Israel] is a state of bullies. Fascists can learn a lesson from this state. This government -- there is none more brazen in human history... **Anyone who joins any joint [sports] activity with the Israelis -- I'll take him off the [Palestinian Football] Association's lists, whether he is a player, coach, judge or, God forbid, a team...** Did we act correctly and convince [FIFA's] General Assembly? Yes. Yes, we'll suspend their [Israel's] membership [in FIFA] and this way we'll screw them... **I won't allow and won't agree to any joint game between Arabs and Israel.**"



[http://www.palwatch.org/pages/news_archive.aspx?doc_id=9614]

Prohibiting sports with Israelis is the official policy of the Palestinian Football Association. On July 21, 2011, the official PA daily *Al-Hayat Al-*

Jadida quoted Abd Al-Majid Hujjah, the then Secretary-General of the Palestinian Football Association, saying the following:

"Abd Al-Majid Hujjah, Secretary-General of the Palestinian Football Association, announced that the Association intends to appoint an investigative committee to look into the circumstances of participation by groups of girl players in a normalization encounter with Israelis in Canada. He emphasized that the investigative committee will submit its recommendations prior to legal steps being taken against the players."

[http://www.palwatch.org/pages/news_archive.aspx?doc_id=5948]

On several occasions, Mr. Rajoub has misappropriated Holocaust imagery and has employed racist language against Israelis, as demonstrated by the following examples:

In an interview on May 17, 2012 on official PA TV Mr. Rajoub rejected attempts at peacebuilding and called the Jews "Satan" and **"Zionist sons of bitches"**



Live broadcast: Opening of the first Forum for Arab women sports journalists, in the presence of PA Prime Minister Salam Fayyad and Deputy-Secretary of the Fatah Central Committee, Chairman of the Palestine Olympic Committee Jibril Rajoub:

"I say also – and on behalf of Palestine: **Something that has no place in the dictionary of Palestinian sportsmen is the subject of normalization with the occupation. Impossible, impossible, impossible... I understand by normalization that the relationship between me and you will be normal, that we'll play [sports] together and there'll be a joint program. I say to you: Under no**

circumstances will there be normalization. Next time we are prepared to bring the Executive Committee in helicopters... so **they will see no Jews, no Satans, no Zionist sons of bitches.** Come by helicopter and go back by helicopter."

[http://palwatch.org/main.aspx?fi=757&doc_id=7125]

- a) In August 2014, Mr. Rajoub appeared on Al-Ghad Al-Arabi TV²¹ and said the following:

"All manifestations and means of official terrorism were revealed in this **fascist, Nazi Israeli mentality**... We will drag this government and these fascists, the new Nazis, to all international forums."

Mr. Rajoub publicized the interview on his personal Facebook page on Aug. 6, 2014. [http://www.palwatch.org/pages/news_archive.aspx?doc_id=12361]

- b) On April 4, 2014, Mr. Rajoub announced on official PA TV:

"I'm telling you, **if Hitler had come [here], he would have learned from them [Israelis]** how to oppress humans and learned from them **about concentration camps, extermination camps.**"



[http://www.palwatch.org/pages/news_archive.aspx?doc_id=11271]

- c) On Jan. 6, 2016, Mr. Rajoub appeared on official PA TV and said the following:

²¹ Broadcast in Egypt and England



Jibril Rajoub: "I say to the Israelis first of all: You sons of bitches, we will not accept less than a Palestinian state. We are the owners of the land, and we are the residents of the land and you are strangers in the land... Our relations with the occupation need to be first of all on a basis of clashes – until a Palestinian state is established. Do not believe in [Israeli Prime Minister] Netanyahu, he is a liar and a scoundrel, and he's a Fascist and represents the new Nazism... From here we say to the 145 Martyrs. You are heroes and we bless you and strengthen your families, and say to you: You are a crown on our heads."

[http://palwatch.org/pages/news_archive.aspx?doc_id=17502]

The following are additional examples of Mr. Rajoub's prohibiting and condemning peacebuilding through sports in recent years:

- a) On Jan. 5, 2014, the official PA daily *Al-Hayat Al-Jadida* reported as follows:

Rajoub: "There will be no youth or sports activity of any kind with the Israeli side"

"A joint meeting was held in the Al-Ram Football Association headquarters between the league's board of directors and the heads of the professional and semi-professional clubs in the presence of Jibril Rajoub, Chairman of the [Palestinian] Football Association..."

Rajoub said: 'There will be no youth or sports activity of any kind with the Israeli side, and we will not renounce our goal of building a free and independent national sports entity.'

[http://palwatch.org/pages/news_archive.aspx?doc_id=11110]

- b) On Jan. 8, 2012, the official PA daily *Al-Hayat Al-Jadida* reported that **Rajoub rejected “normalization” with Israel “in all its forms,” including sports:**

Headline: "Rajoub: We will not agree to normalization, which some elements are trying to introduce into the realm of Palestinian sports"

"Chairman of the Palestine Olympic Committee and the Palestinian Football Association, Jibril **Rajoub, once again yesterday expressed his opposition to normalization in all its forms, including normalization in the realm of sports.**"

[http://palwatch.org/pages/news_archive.aspx?doc_id=6907]

- c) On Jan. 2, 2012, Rajoub announced on official PA TV:

"The Israeli flag will not, not, not be raised in the Palestinian territories, and the Palestinian team will not play against any team within the Green Line (i.e., inside the state of Israel)."

[http://palwatch.org/pages/news_archive.aspx?doc_id=6486]

- d) On Sept. 2, 2016, official PA TV broadcast an interview by Egyptian TV channel ONTV with Mr. Rajoub, during which he rejected peacebuilding with Israel, not merely for Palestinians, but demanded that Egyptians and all Arabs likewise reject peacebuilding as “treason”:

Rajoub: “We say to the Arabs: **It is forbidden for anyone to create normalization with Israel! Normalization with Israel is treason.** We also say to members of the Egyptian press and [address] the Egyptian public opinion : You must distinguish between reaching us (i.e., traveling to the PA areas) - and after all we are your relatives and loved ones, and we are on our land and want you to come to us, and that is an important message – and normalization with Israel. There is no normalization with Israel!”

[http://palwatch.org/pages/news_archive.aspx?doc_id=19110]

- e) In the summer of 2013, the Barcelona FC travelled to Israel and to the areas controlled by the Palestinian Authority. Many preparations were made for the visit and much discussion was held regarding using the visit to bridge gaps between Israelis and the Palestinians. Time after time, Mr. Rajoub rejected these overtures.

On Feb. 25, 2013, on the sports program *Pulse of the Fields*, aired on the official PA TV, **Rajoub rejected sports contacts with Israelis:**

PA TV host: "He [President of the Barcelona Club] also came with a message of peace, and the visit was related to sports with a political side, and he spoke about a game between an Israeli and Palestinian team against Barcelona. What do you have to say about this?"

Rajoub: "Impossible, impossible, impossible that there be any sport-related contact with the Israeli side, in any situation."

[http://palwatch.org/pages/news_archive.aspx?doc_id=9311]

On May 23, 2013, the official PA daily *Al-Hayat Al-Jadida* reported as follows:

"Head of the [Palestinian] Football Association [and Deputy-Secretary of the Fatah Central Committee and Chairman of the Palestine Olympic Committee] Jibril Rajoub met with economic Vice President of the Barcelona Football Club Javier Faus. He discussed a few issues related to organizing the Catalonian team's future visit to Palestine, in addition to ways of strengthening cooperation between the Palestinian Association and the old club.

Rajoub reiterated his complete objection to holding joint meetings or games of any kind that would be attended by Israeli players or administrators."

[http://palwatch.org/pages/news_archive.aspx?doc_id=9135]

On June 2, 2013, the Al-Kass Sports Channel, broadcast in Qatar, aired an interview with Mr. Rajoub in which he said the following:

TV host: "Mr. Jibril, does the visit of Barcelona's [football] team include a visit to the occupied lands?"

Rajoub: "They are coming to the occupied lands. All of Palestine - from the [Jordan] river to the [Mediterranean] sea (i.e., all of Israel) - it's all occupied."

TV host: "I mean the Israeli occupied lands."

Rajoub: "You mean [occupied in] 1948 (i.e., Israel's establishment)?"

TV host: "Yes."



Rajoub: "On Aug. 3 [2013] they are coming to us. Where they go after that - I'm not responsible for them... **There was a stupid Israeli attempt to do something [a sports activity] together.**"

[http://palwatch.org/pages/news_archive.aspx?doc_id=9154]

Interim summary

By referring to Jews as "Satans" and "sons of bitches" that have "fascist, Nazi mentalities," and by prohibiting normalization between the two sides, calling it a "crime against humanity," the president of the PFA, Mr. Rajoub, is clearly and obviously in breach of Article 4 of the FIFA Statutes. His words are clearly discriminatory on account of race, ethnic, and national origin and obviously denigrate and offend the dignity of the Jewish People, and are thereby in breach of Article 58 of the FIFA Disciplinary Code.

Similarly, the official position of the PFA, which prohibits any and all attempts at normalization, by, *inter alia*, threatening legal and other proceedings against athletes and clubs that participate in such activities, is clearly in breach of Article 4 of the FIFA Statutes.

Conclusion

As shown above, the PFA and its president, Mr. Jibril Rajoub, regularly **violate** FIFA's Statutes and Disciplinary Code by using **Palestinian football as a vehicle to glorify and honor terrorist murderers**; by **inciting hatred and violence**; and by **promoting racism while prohibiting the use of sports as a bridge for peace** between Palestinians and Israelis.

The above actions are in direct contravention of Articles 3 and 4 of the FIFA Statutes and Articles 53 and 58 of the FIFA Disciplinary Code.

The considerable evidence set forth in this complaint is unequivocal insofar as it is based, for the most part, on official publications of the Palestinian Authority and on televised interviews with Mr. Rajoub.

The evidence shows that both the PFA and its president hold the most basic principles and documents of FIFA in contempt and trample on the intrinsic values of FIFA and the game of football.

Each of the aforementioned severe breaches of the FIFA Statutes and Disciplinary Code requires that FIFA take immediate disciplinary action against the PFA and its president, Mr. Rajoub.

It is important to recall that the sanction for **breaching Article 4 of the FIFA Statute** is "**suspension or expulsion.**"

The sanction for **breaching Article 53 of the FIFA Disciplinary Code** is a **match suspension for no less than twelve months and a minimum fine**, since the offences were committed using the mass media, **of CHF 20,000.**

The sanction for breaching Article 58 of the FIFA Disciplinary is a match suspension of at least five matches and a minimum fine of CHF 30,000.

The exact sanction(s) for breaching Article 3 of the FIFA Statutes are not prescribed by the article, but considering its important and fundamental nature, we would assume that the penalty for multiple breaches of this provision would be, in accordance with Article 11 of the FIFA Disciplinary Code, a ban on taking part in any football-related activity for an extended period of time.