



## **THE TRUTH ABOUT THE U.N. COMMISSION OF INQUIRY'S ALLEGATIONS OF SEXUAL AND REPRODUCTIVE VIOLENCE AGAINST ISRAELI FORCES**

### **I. INTRODUCTION**

The recent report published by the United Nations' Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel (COI or Commission) is titled “‘More than a human can bear’: Israel’s systematic use of sexual, reproductive and other forms of gender-based violence since 7 October 2023.”

This title, including the sectional headings, creates an image that Israeli soldiers are engaged in raping men and women, forcing miscarriages, performing forced sterilizations and genital mutilations, and committing sexual slavery, enforced prostitution, or forced pregnancies.

However, the COI’s report provides no examples or evidence of such instances. It does not even state that Israeli forces have engaged in such conduct. A question arises: what conduct does the COI allege as sexual and reproductive violence?

### **II. ALLEGED EXAMPLES OF SEXUAL, REPRODUCTIVE, AND GENDER-BASED VIOLENCE**

As hospitals have maternity wards, and their destruction has an adverse effect on women, the COI’s report alleges that any attack on a hospital is “reproductive violence,” regardless of the evidence of the hospital being used by terrorists to carry out their activities. In addition to hospitals, any destruction of roads leading to a hospital is also “reproductive violence” in the Commission’s eyes, as it also has an adverse effect on women. The COI clearly misunderstands the laws of war.

The Commission further calls the shortage of menstrual pads<sup>1</sup> and healthy food for pregnant women “reproductive violence.”<sup>2</sup> One example of “reproductive violence” the Commission cites is a pregnant woman who had to eat canned tuna due to the lack of flour to make bread, or lack of

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<sup>1</sup> Indep. Int’l Comm’n of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel, “*More than a human can bear*”: Israel’s systematic use of sexual, reproductive and other forms of gender-based violence since 7 October 2023, ¶ 75, A/HRC/58/CRP.6 (Mar. 13, 2025) [hereinafter COI Report].

<sup>2</sup> *Id.* ¶ 65.

milk or eggs.<sup>3</sup> Another example of “reproductive violence” the Commission provides is a woman who was no longer able to produce breastmilk due to stress and anxiety brought on by the hostilities.<sup>4</sup> One woman reported to the Commission that “due to the lack of menstrual pads, she had to use children’s nappies on one occasion or a piece of cloth.”<sup>5</sup> The Commission unashamedly alleges that these unfortunate secondary consequences of war constitute “reproductive violence.” Additionally, the Commission ignores the fact that it is not Israel who is responsible for the lack of supplies in Gaza. Hamas and other terrorist organizations in Gaza initiated the war, and they steal supplies intended for civilians in Gaza.<sup>6</sup>

Under the heading “Israel’s systematic use of sexual and gender-based violence,” the COI does not allege that Israeli soldiers are raping women, committing sexual slavery, or other forms of sexual violence as a method of warfare. What it alleges as evidence of “Israel’s systematic use of sexual and gender-based violence” is that “Israeli officials have used sexual violence committed [by Hamas terrorists] on Israeli women on 7 October to mobilize support for the [Israeli Defense Forces (IDF)] military operations in the Gaza Strip and . . . violence as a means of terrorizing the Israeli population . . . .”<sup>7</sup> Calling Hamas’s systematic sexual violence committed on October 7 “*Israel’s* systematic use of sexual violence”—simply because Israel has pointed out the horrific sexual violence committed on October 7 by terrorists from Gaza—is not only grossly unethical, it is shockingly appalling.

Moreover, the COI concludes that the IDF “specifically targeted men and boys on the ground of gender” by, among other things, disseminating videos of “alleged male perpetrators of sexual violence committed in Israel on 7 October[,] . . . revealing the identities of Palestinian men despite the absence of due process, formal prosecution and conviction by a court.”<sup>8</sup> The COI’s hypocritical bias becomes so apparent when it calls terrorists from Gaza “*alleged* male perpetrators” when there is clear video evidence of their vile conduct, and, at the same time, *concludes* that Israeli soldiers are committing sexual war crimes and crimes against humanity simply because videos (which terrorists from Gaza filmed themselves) were circulated. Again, this sad attempt to somehow twist Hamas’s evil actions and try to blame Israel for them is pathetic and inexcusable.

As examples of the gender-based impact of displacement, the COI alleges that “[t]he lack of food, safe shelter, privacy and educational opportunities, will lead families to resort to harmful coping mechanisms such as early marriage.”<sup>9</sup> According to the Commission, Israel is committing gender-

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<sup>3</sup> *Id.*

<sup>4</sup> *Id.* ¶ 66.

<sup>5</sup> *Id.* ¶ 77.

<sup>6</sup> *Caught on camera: Hamas terrorists steal humanitarian aid, beat civilians*, I24NEWS, Dec. 11, 2023, [https://www.i24news.tv/en/news/middle-east/palestinian-territories/1702285314-caught-on-camera-hamas-terrorists-steal-humanitarian-aid-beat-civilians#google\\_vignette](https://www.i24news.tv/en/news/middle-east/palestinian-territories/1702285314-caught-on-camera-hamas-terrorists-steal-humanitarian-aid-beat-civilians#google_vignette)

<sup>7</sup> COI Report, ¶ 79.

<sup>8</sup> *Id.* ¶ 201.

<sup>9</sup> *Id.* ¶ 141.

based violence because Palestinian families will marry their daughters early due to the difficulties of war. The COI further alleges that “[g]ender-based violence, including intimate partner violence, remains a threat for many women in Gaza.”<sup>10</sup> According to the Commission, Israel is guilty of gender-based violence when Palestinian men beat their female partners. The absurdity of the Commission’s distorted reasoning is stunning.

Other specious examples provided by the COI of gender-based violence by Israel included the fact that “[m]any women were also separated from their husband or widowed, leading to shifts in household dynamics that forced them to step into roles traditionally filled by men, such as being the principal income earner.”<sup>11</sup> According to the Commission, Israeli forces are guilty of gender-based violence because women in Gaza who lost their men (many of whom were terrorists who committed the horrific acts on October 7) might have to work outside the home.

The Commission further alleges that “[a]bout 12,000 women have been made widows in Gaza since October 2023.”<sup>12</sup> It states that “[w]idowed women lack protection in accessing rights to child custody and guardianship, as well as control over inheritance from a deceased spouse.”<sup>13</sup> Apart from not even remotely constituting sexual or gender-based violence, these examples ignore the fact that the men who are targeted by the IDF are *terrorists engaged in an armed conflict with Israel*. Many of them were the ones who attacked, brutally raped, and butchered Israeli men, women, and children on October 7. The Commission has essentially labeled an alleged number of 12,000 male casualties as innocent civilian casualties without any evidence. Once again, the COI’s faulty accusations demonstrate its lack of understanding of the laws of war, or of common sense. More importantly, any women in Gaza who have become widows is not a result of “gender-based violence” but of war—a war which was initiated by men from Gaza.

The COI also unashamedly blamed Israel for the gender-based discrimination by Palestinian men against Palestinian women. It states that “[p]rotracted conflict and displacement result in gendered impacts due to the exacerbation of pre-existing structural gender-discrimination. Women from Gaza have told the Commission about controlling behaviors from male family members that restricted their agency.”<sup>14</sup> The COI further states that Palestinian women are forced by their fathers to wear a veil throughout the conflict.<sup>15</sup> According to the Commission, Israel’s military operation in Gaza has caused this oppression of Palestinian women by their fathers. These issues, the Commission alleges, constitute “Israel’s systematic use of sexual, reproductive and other forms of gender-based violence.”

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<sup>10</sup> *Id.*

<sup>11</sup> *Id.* ¶ 142.

<sup>12</sup> *Id.* ¶ 143.

<sup>13</sup> *Id.*

<sup>14</sup> *Id.* ¶ 144.

<sup>15</sup> *Id.* ¶¶ 144-45.

In its own words, the most “egregious” examples of the gender-based violence the Commission presents are alleged videos showing the IDF strip-searching detainees. According to the Commission’s own report, the Israeli government has given two kinds of responses to the strip searches. First, the Israeli government stated that “[d]ue to the militants’ tactics of concealing explosives and other weapons under civilian clothing and the need to ensure they do not pose an immediate threat to the ground force, there may be a need to search them, including by partial removal of clothing.”<sup>16</sup> This legitimate security reason is well known and well documented. Second, in cases where it appears that the IDF conducted searches in an undignified manner or assaulted a detainee, the IDF stated that “the conduct of the soldiers was serious and not in line with the army’s orders and that the case was under investigation”<sup>17</sup> or the soldier’s “service was suspended.”<sup>18</sup> In fact, since October 7, 2023, Israel’s Military Advocate General’s Corps has launched at least seventy-four criminal investigations regarding incidents that raised suspicion of criminal misconduct.<sup>19</sup> Yet, the Commission falsely claims that there is a “clear culture of impunity within the [IDF].”<sup>20</sup>

Notably, as even acknowledged by the Commission, “strip-searches for security justifications are not unlawful *per se*.”<sup>21</sup> However, the Commission alleges that “in the situations and cases documented by [it,] the motivation from the outset *appeared* to have been retribution and a desire to humiliate, while in other cases, even if there was a security rationale, the processes were not conducted according to the acceptable standards and in a dignified manner.”<sup>22</sup> As reflected in its own language, the Commission relies on the “appearance” of bad intent on the part of the IDF instead of actual evidence. As the Commission should know, to rely on the “appearance” of bad intent, especially in light of valid security reasons, is disgraceful. The Commission simply ignores the legitimate, documented security reasons for strip searches. This is incredibly irresponsible and merely heightens yet again the Commission’s bias.

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<sup>16</sup> *Id.* ¶ 103.

<sup>17</sup> *Id.* ¶ 98.

<sup>18</sup> *Id.* ¶ 99.

<sup>19</sup> *Addressing Alleged Misconduct in the Context of the War in Gaza*, IDF MIL. ADVOC. GEN.’S CORPS (Feb. 24, 2024), <https://www.idf.il/en/mini-sites/military-advocate-general-s-corps/addressing-alleged-misconduct-in-the-context-of-the-war-in-gaza/>.

<sup>20</sup> COI Report, ¶ 148.

<sup>21</sup> *Id.* ¶ 103.

<sup>22</sup> *Id.* (emphasis added).

### III. INTERNATIONAL LAW REGARDING SEXUAL, REPRODUCTIVE, AND GENDER-BASED VIOLENCE

Crimes of a sexual nature include rape, sexual slavery, enforced prostitution, forced pregnancy, enforced sterilization,<sup>23</sup> trafficking for sexual exploitation,<sup>24</sup> mutilation of sexual organs,<sup>25</sup> sexual exploitation (such as obtaining sexual services in return for food or protection),<sup>26</sup> forced abortions,<sup>27</sup> enforced contraception,<sup>28</sup> sexual assault,<sup>29</sup> forced marriage,<sup>30</sup> forced inspections of virginity, sexual harassment (such as forced public nudity),<sup>31</sup> or *any other form of sexual violence of comparable gravity*.<sup>32</sup> These acts may constitute crimes against humanity “when committed as part of a widespread or systematic attack directed against any civilian population.”<sup>33</sup> Such acts, including “outrages upon personal dignity, in particular humiliating and degrading treatment,”<sup>34</sup> may also constitute war crimes “when committed as part of a plan or policy or as part of a large-scale commission of such crimes.”<sup>35</sup>

Further, the Fourth Geneva Convention states that “[w]omen shall be especially protected against any attack on their honour, in particular against rape, enforced prostitution, or any form of indecent assault.”<sup>36</sup> The Convention also prohibits “outrages upon personal dignity, in particular humiliating and degrading treatment, enforced prostitution and any form of indecent assault.”<sup>37</sup>

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<sup>23</sup> Rome Statute of the International Criminal Court, art. 7(1)(g), opened for signature July 17, 1998, 2187 U.N.T.S. 90 (1999).

<sup>24</sup> G.A. Res. 55/25, art. 3 (Nov. 15, 2000).

<sup>25</sup> *Prosecutor v. Bagosora*, Case No. ICTR-96-7, Judgment (Trial Chamber), ¶ 976 (Dec. 18, 2008).

<sup>26</sup> MEGAN BASTICK ET AL., *SEXUAL VIOLENCE IN ARMED CONFLICT: GLOBAL OVERVIEW AND IMPLICATIONS FOR THE SECURITY SECTOR* 19 (2007). *See also* WORLD HEALTH ORGANIZATION (WHO), *WORLD REPORT ON VIOLENCE AND HEALTH* 149 (Etienne G. Krug et al. eds., 2002).

<sup>27</sup> BASTICK, *supra* note 26, at 19; WHO, *supra* note 26, at 149.

<sup>28</sup> BASTICK, *supra* note 26, at 19.

<sup>29</sup> *See* Geneva Convention (IV) Relative to the Protection of Civilian Persons in Time of War art. 27, 12 Aug. 1949, 75 U.N.T.S. 306 [hereinafter GC IV]; Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I) art. 75(2)(b), June 8, 1977, 1125 U.N.T.S. 37 [hereinafter AP I]; Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of Non-International Armed Conflicts (Protocol II) art. 4(2)(e), June 8, 1977, 1125 U.N.T.S. 612 [hereinafter AP II]; Rome Statute, art. 8(2)(e)(vi); Statute of the International Tribunal for Rwanda (ICTR Statute) art. 4(e) (Nov. 8, 1994); Statute of the Special Court for Sierra Leone (SCSL Statute), art. 3(e) (Jan. 16, 2002); UN Transitional Administration in East Timor (UNTAET), Regulation on the Establishment of Panels with Exclusive Jurisdiction Over Serious Criminal Offences, § 6.1(e)(vi), U.N. Doc. UNTAET/REG/2000/15 (June 6, 2000).

<sup>30</sup> BASTICK, *supra* note 26, at 49; WHO, *supra* note 26, at 149.

<sup>31</sup> *Prosecutor v. Akayesu*, Case No. ICTR-96-4-T, Judgement, ¶¶ 688, 693 (Sept. 2, 1998); *Prosecutor v. Kunarac*, Case No. IT-96-23, 23/1-T, Judgement, ¶¶ 766-74 (Int'l. Crim. Trib. for the Former Yugoslavia Feb. 22, 2001).

<sup>32</sup> Rome Statute, art. 7(1)(g).

<sup>33</sup> *Id.* art. 7(1).

<sup>34</sup> *Id.* art. 8(2)(b)(xxi).

<sup>35</sup> *Id.* art. 8(1).

<sup>36</sup> GC IV, art. 27.

<sup>37</sup> AP I, art. 75(2)(b).

As is clear from the COI's examples of the so-called sexual and reproductive violence by the IDF, none of the allegations, even if considered true, fall within the scope of sexual or reproductive violence, let alone *acts of sexual violence of comparable gravity* to rape and sexual assault. Such clear disparity and manipulation of facts and law only lead to one conclusion: *the Commission has not only disgraced its mandate, but it has also disgraced the actual victims of sexual violence in every armed conflict, especially the victims of October 7.*

Regarding strip searches, international law does not forbid strip searches *per se*. It forbids “indecent assault,” “outrages upon personal dignity,” “humiliating and degrading treatment,” and the like.<sup>38</sup> The humiliation required under international law to rise to the level of a serious attack on human dignity must be “so intense that any reasonable person must be outraged.”<sup>39</sup> Strip searches for security purposes, even in prisons, are not interpreted to constitute humiliating and degrading treatment, let alone in combat zones where the enemy does not wear military uniform and hides explosives in plain clothes.

In other armed conflicts, international criminal tribunals have determined whether forcing detainees to remove their clothing constitutes sexual violence.<sup>40</sup> For instance, forcing detainees to dance naked on a table,<sup>41</sup> forcing prisoners to relieve themselves in their clothing,<sup>42</sup> undressing female prisoners to only their blouse to parade in front of other combatants,<sup>43</sup> and forcing a woman to strip and perform gymnastics naked for the entertainment of her captors<sup>44</sup> constituted humiliating and degrading treatment. In all of these cases, however, the forced nudity had nothing to do with strip searches for safety reasons in an active war zone.

The European Court of Human Rights has held that strip searches of prisoners are *not* generally cruel, inhuman, or degrading. The court said that a strip search procedure, including visual inspection of a prisoner's anus, was lawful if the search was “absolutely necessary” and there were “serious reasons” to suspect a prisoner was hiding something in the area being searched.<sup>45</sup> Here, since Hamas and other terrorists (both men and women) unlawfully wear civilian clothing in

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<sup>38</sup> See Eur. Consult. Ass., *Overview of Legal Protection Against Sexual Violence Afforded to Women During Situations of Armed Conflict*, CAHVIO 2–3 (2009), <https://rm.coe.int/1680593fc6>.

<sup>39</sup> *Prosecutor v. Aleksovski*, Case No. IT-95-14/1-T, Trial Chamber, Judgement, ¶ 56 (June 25, 1999). See Fionnuala Ní Aoláin, *Forced Nudity: What International Law and Practice Tell Us*, JUST SECURITY (June 1, 2016), <https://www.justsecurity.org/31325/forced-nudity-international-law-practice/>.

<sup>40</sup> *Prosecutor v. Katanga*, ICC-01/04-01/07, Decision on the confirmation of charges, ¶¶ 367-71 (Sept. 30, 2008).

<sup>41</sup> *Prosecutor v. Kunarac*, Case No. IT-96-23&23-1, Judgment ¶¶ 766–74 (Intl. Crim. Trib. for the Former Yugoslavia Feb. 22, 2001).

<sup>42</sup> *Prosecutor v. Bagosora*, Case No. ICTR-98-41-T, Trial Chamber, Decision on Motions for Judgement of Acquittal, 18, n. 84 (Feb. 2, 2005).

<sup>43</sup> *Id.* ¶¶ 373–77.

<sup>44</sup> *Akayesu*, Case No. ICTR-96-4-T, ¶ 429.

<sup>45</sup> See *Frerot v. France*, ECHR App. No. 70204/01 (June 12, 2007); Rebecca Pereira, *Strip Searching may Constitute Torture or other Cruel, Inhuman or Degrading Treatment or Punishment*, HUM. R. L. CTR., <https://www.hrlc.org.au/human-rights-case-summaries/frerot-v-france-2007-echr-7020401-12-june-2007> (last visited Apr. 3, 2025).

combat and use civilian facilities to carry out their terrorist attacks, strip searches are absolutely necessary for the safety of the IDF.

The COI gives a handful of examples of “sexual assault and harassment” allegedly suffered by female detainees at the hands of the IDF.<sup>46</sup> These include threats and insults, but no physical sexual assault is alleged.<sup>47</sup> While the Commission states that there is testimony from alleged victims of humiliating strip searches, there is no way to confirm these reports. What we do know for sure is that instances of misconduct are being properly investigated and prosecuted by Israel’s Military Advocate General’s Corps.<sup>48</sup> The evidence of Israel policing misconduct should at least be given as much weight as the testimony of alleged victims to such an obviously biased investigative body. The Commission ignores any such information and accuses Israel of impunity.

Further, the COI does cite to one case of a Palestinian man in detention who it claims was “raped.”<sup>49</sup> Ironically, the COI’s evidence for this case is an indictment in an Israeli military court, meaning Israel is investigating and prosecuting the case in a proper forum.<sup>50</sup> Based on this case alone, the COI makes generalized statements that it “documented *cases of rape* and sexual assault of male detainees.”<sup>51</sup> It also makes generalized conclusions that “these and other forms of sexualized torture, including rape and violence targeting the genitals, are committed with either explicit orders or an implicit encouragement by the top civilian and military leadership.”<sup>52</sup> Again, this bold accusation is made against the Israeli leadership without any evidence. The COI further states in the recommendations section that the Government of Israel “[i]mmediately cease the perpetration of *rape* and other forms of sexual and gender-based violence.”<sup>53</sup> The COI is asking Israel to stop something that is not even occurring.

The Commission’s example of only one case of alleged rape also shows that Israel does not have any policy or practice of sexual or reproductive violence. Ironically, the Commission’s report instead proves that Israeli forces have not stooped to the level of Hamas terrorists. The fact that the Commission can point to only one case of alleged rape shows the high level of discipline by the IDF in conducting its military operation in Gaza and elsewhere, even after watching videos of terrorists from Gaza raping hundreds of women and mutilating them, and picking up thousands of body parts, including genitals of men and women.

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<sup>46</sup> COI Report, ¶ 124.

<sup>47</sup> *Id.* ¶¶ 124-25.

<sup>48</sup> *Id.* ¶ 125; see *Addressing Alleged Misconduct in the Context of the War in Gaza*, IDF MIL. ADVOC. GEN.’S CORPS (Feb. 24, 2024), <https://www.idf.il/en/mini-sites/military-advocate-general-s-corps/addressing-alleged-misconduct-in-the-context-of-the-war-in-gaza/>.

<sup>49</sup> COI Report, ¶ 120.

<sup>50</sup> *Id.* ¶¶ 120, 155.

<sup>51</sup> *Id.* ¶ 119 (emphasis added).

<sup>52</sup> *Id.* ¶ 124.

<sup>53</sup> *Id.* ¶ 227(1).

While the instances of destruction of hospitals or the roads leading to them, or the scarcity of maternity equipment, sanitary pads, and healthy food, are a sad reality of an armed conflict, they do not constitute sexual, reproductive, or gender-based violence. Further, they are the result of Hamas's attacks on Israel, stealing humanitarian relief and supplies, and both stashing weapons in and carrying out their terrorist activities from hospitals and other civilian facilities. To call such instances "sexual and reproductive violence" is shameful and a slap in the faces of the hundreds of men, women, and children who were raped and mutilated by terrorists from Gaza on October 7, 2023.

Sadly, according to the COI, Gazan women having to use children's nappies instead of sanitary pads during menstruation, eating canned tuna instead of bread, milk, and eggs during pregnancies, and having to wear a veil due to the conflict are more serious examples of sexual, reproductive, and gender-based violence than terrorists from Gaza gang-raping Israeli women, shooting them while still raping them, shoving foreign objects in their vaginas, cutting their genitals, and leaving hundreds of bodies naked after sexually assaulting them. This is absolutely shameful and reflects so negatively on the COI that its credibility is gone.

What is more alarming is that the International Court of Justice (ICJ), U.N. Human Rights Council,<sup>54</sup> Security Council,<sup>55</sup> Secretary General,<sup>56</sup> international organizations, and media are all blindly relying on the COI's reports. The ICJ, in its Advisory Opinion on the Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem, relied on the COI's reports at least *fourteen* times.<sup>57</sup>

Relying on the COI's current report, Amnesty International stated the following:

These damning findings are another clear illustration of the devastating impact of Israel's genocide in Gaza and its use of gender-based violence to oppress Palestinian women and girls across the Occupied Palestinian Territory and to use sexual violence to perpetuate oppression on Palestinians of all genders, especially in Israeli detention centers.<sup>58</sup>

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<sup>54</sup> Press Release, "More than a human can bear": Israel's systematic use of sexual, reproductive and other forms of gender-based violence since October 2023, U.N.H.R. COUNCIL (Mar. 13, 2025), <https://www.ohchr.org/en/press-releases/2025/03/more-human-can-bear-israels-systematic-use-sexual-reproductive-and-other?sub-site=HRC>.

<sup>55</sup> S.C. Pres. Release 16023, UN (Mar. 18, 2025), <https://press.un.org/en/2025/sc16023.doc.htm>.

<sup>56</sup> U.N. Sec'y Gen., *Israeli Practices Affecting the Human Rights of the Palestinian People in the Occupied Palestinian Territory, including East Jerusalem*, ¶¶ 50, 53, U.N. Doc. A/78/502 (Oct. 2, 2023).

<sup>57</sup> Legal Consequences Arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, Including East Jerusalem, Advisory Opinion, I.C.J. Reports 2024, ¶¶ 89, 117, 120, 130-31, 135, 151-53, 163, 166, 168.

<sup>58</sup> *UN report on Israel's gender-based violence and genocidal acts against women's health facilities must spur action to protect Palestinians*, AMNESTY INT'L (Mar. 13, 2025), <https://www.amnesty.org/en/latest/news/2025/03/un-report-on-israels-gender-based-violence-and-genocidal-acts-against-womens-health-facilities-must-spur-action-to-protect-palestinians/>.



The International Center for Transitional Justice said the following about the report: “The UN experts determined there were ‘reasonable grounds to conclude’ the allegations were committed, and that ‘such systematic attacks were intentional.’”<sup>59</sup>

One of the Commission’s members, Chris Sidoti, said the following about the report: “‘Sexual violence is now so widespread that it can only be considered systematic. It’s got beyond the level of random acts by rogue individuals.’”<sup>60</sup>

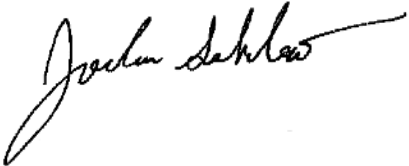
Yet, the evidence presented by the COI does not even remotely constitute sexual or gender-based violence.

The above discussion proves yet again the COI’s anti-Israel bias. The COI’s reports show that its members do not care about the actual victims of sexual, reproductive, and gender-based violence. They have one agenda: to demonize Israel—yet they continue to fail to provide an iota of evidence to support their absurd allegations. The COI’s reports are disgraceful, as are the decisions by international organizations and officials to blindly rely on them.

#### IV. RECOMMENDATIONS

In light of the COI’s unethically biased and grossly faulty reports, its mandate should be terminated, and its members investigated and reprimanded for gross unethical conduct.

Respectfully submitted,



Jordan Sekulow  
Senior Counsel



Shaheryar Gill  
Senior Counsel



CeCe Heil  
Senior Counsel

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<sup>59</sup> David Gritten, *UN experts accuse Israel of sexual violence and ‘genocidal acts’ in Gaza*, BBC, (Mar. 13, 2025), <https://www.bbc.com/news/articles/clyr154314vo>.

<sup>60</sup> *Id.*