

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
AMARILLO DIVISION**

DR. RONNY JACKSON, STUART and ROBBI
FORCE, and SARRI SINGER,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., et al,

Civil Action No. 2:22-cv-241-Z

Defendants.

**SECOND APPENDIX IN SUPPORT OF PLAINTIFFS'
MOTION FOR PARTIAL SUMMARY JUDGMENT**

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Dated: November 13, 2024

Respectfully submitted,

/s/ Michael Ding

REED D. RUBINSTEIN

D.C. Bar No. 400153

reed.rubinstein@aflegal.org

JULIE A. STRAUSS

D.C. Bar No. 387262

julie.strauss@aflegal.org

MICHAEL DING

Texas Bar No. 24129788

America First Legal Foundation

611 Pennsylvania Ave SE #231

Washington, D.C. 20003

(202) 964-3721

Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I certify that on November 13, 2024, a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) and served on all counsel of records.

/s/ Michael Ding

Michael Ding

AMERICA FIRST LEGAL FOUNDATION

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Defendants.

DECLARATION OF RONNY JACKSON, MD

1. My name is Ronny Jackson. I am over eighteen and competent to make this declaration.

2. The information in this declaration is based on my personal knowledge, information, and belief.

3. I am a resident of Amarillo, Texas and a citizen of the United States.

4. I am a Member of Congress representing the 13th District of Texas. I serve on the House Agriculture Committee, the House Armed Services Committee, the House Foreign Affairs Committee, the House Permanent Select Committee on Intelligence, and the House Select Subcommittee on the Coronavirus Pandemic. On the House Foreign Affairs Committee, I sit on the Subcommittee on Middle East, North Africa, and Central Asia, which has jurisdiction over matters affecting the political relations between the United States and the countries of the region.

5. I am a graduate of Texas A&M University and the University of Texas Medical Branch. I had twenty-five years of active-duty service in the United States Navy, completing my residency in Emergency Medicine. I deployed to Iraq to lead

Resuscitative Medicine efforts on the battlefield for a combat Surgical Shock Trauma Platoon. I then served in the White House Medical Unit during President George W. Bush's Administration and ultimately led the White House Medical Unit as Director of the White House Medical Unit and Physician to the President during the Obama Administration. In December 2014, I ended my duties as Director and continued being Physician to the President. In January 2019, President Donald J. Trump appointed me as Chief Medical Advisor and Assistant to the President. In December 2019, I retired from the United States Navy as a Rear Admiral.

6. I accompanied Presidents on their trips to Israel multiple times. More recently, I traveled to Israel in September 2022. I intend to travel to and visit the State of Israel again in the very near future for Congressional business, personal pleasure, and religious reasons.

7. I am aware that the Palestinian Authority encourages and incites terrorism in its schools, mosques, and media outlets, and funds and/or coordinates it through its pay-to-slay program, among other things.

8. I am aware that the Palestinian Authority facilitates, funds, and supports Palestinian terrorists who frequently attempt to attack and kill civilians who live in and tourists who visit the State of Israel. As the defendants know, terrorist attacks subsidized by the Palestinian Authority occur wherever Palestinian Arabs are allowed or gain access or entry to Israel, and/or in areas controlled by the Palestinian Authority or other Palestinian groups, including Hamas. Although the Palestinian Authority is

supposedly opposed to Hamas, it pays Hamas members for killing Israelis and foreign tourists to that country.

9. Because Israel is a free country, and because the Palestinians divert foreign aid to build tunnels in civilian areas, purchase and manufacture rockets and other weapons, and fund terrorist operations, this means that terrorist attacks against civilians, including tourists, can occur throughout Israel.

10. I am further aware and believe the Palestinian Authority organizes and facilitates terrorism through its U.S.-funded security services; multiple published reports confirm that the Palestinian Authority's employees and security officials plan and execute terror attacks against civilians in Israel.

11. I am further aware that it has long been U.S. government policy to take aggressive steps to "dry up" the flow of funds and resources to terrorists and their supporters. This is a basic principle of our anti-terrorism policy.

12. I am further aware that the defendants have actual knowledge of the Palestinian Authority's critical and extensive role in anti-Israel and anti-Semitic terrorism. For years, the Authority has chosen to fund terrorists rather than provide basic services to the people under its rule.

13. I am further aware that the defendants have actual knowledge that funding the Palestinian Authority increases the frequency and lethality of terrorist attacks against Israeli civilians and tourists to that country. They admit this in their November 5, 2024, report to the Congress. U.S. Dep't of State, *Determination on Imposition and Waiver of Sanctions under Sections 603 and 604 of the Foreign Relations Authorization*

Act, Fiscal Year 2003 (Public Law 107-228) at 10 (Nov. 5, 2024) attached and incorporated by reference hereto as Exhibit 1 (the “Defendants’ Report”).

14. I believe that the defendants know that their practice of flooding Gaza and the West Bank with economic support funds directly benefits the Palestinian Authority by relieving it of its obligations to provide education, health, and other services. In fact, I believe this was and remains their intention and purpose.

15. I further believe that the defendants have used payments to third-party organizations, to directly benefit the Palestinian Authority and, notwithstanding its corruption, anti-Semitism, violence, and support for terrorism, to ensure that it maintains a presence in Gaza and power in the West Bank by funding local government services that it ignores to pay terrorists. The December 14, 2021, Joint Statement on the US-Palestinian Economic Dialogue, as described in the Amended Complaint ¶¶ 68–72, is just one example of the defendants’ multipronged effort to support and directly benefit the Palestinian Authority. The Defendants’ Report also makes this clear. Defendants’ Report at 8. There, the defendants admit that it is their “expressed willingness to partner with the [Palestine Liberation Organization] and [Palestinian Authority] leadership.” *Id.* at 8.

16. The defendants say that the Palestinian Authority “continues to be challenged by a deep and extended fiscal crisis.” *Id.* at 2. It is \$6 billion in arrears, including \$1 billion to the “private sector,” and cannot pay 150,000 public sector employees their full salary. *Id.* at 3. The defendants say the “ongoing salary cuts and non-payment of bills put additional negative pressure on the constrained Palestinian

economy and increased the likelihood that public sector employees looked for financial opportunities elsewhere.” *Id.*

17. Yet my understanding is that the defendants have reported to Congress that the Palestinian Authority spent \$340 million on pay-to-slay just in 2018. There have been hundreds of terror attacks over the past six years, and the Palestinian Authority has promised to pay the perpetrators of the October 7 massacres. I believe that the amount being paid to terrorists and their families is therefore much larger today than it was six years ago. See Amended Complaint at ¶¶ 25–30. The Authority has chosen to pay terrorists rather than teachers or health care workers and the defendants know it. To pick up the slack, and to directly benefit and protect the Palestinian Authority and its leaders, the defendants admit funneling over \$1.6 billion into Gaza and the West Bank to “provide health care and education,” among other things. Defendants’ Report at 9. This allows them to spare the Authority from the political cost of choosing to fund terrorists rather than provide basic social services.

18. The defendants say that they “monitor and evaluate programs” to “mitigate the risk that U.S. foreign assistance could be diverted for terrorist purposes.” *Id.* at 9. I am extremely concerned because they do *not* say that they *prevent* U.S. foreign assistance from being diverted for terrorist purposes, or even substantially mitigate the risk that it is.

19. I further believe that the defendants have data and information showing that their decision to resume sending hundreds of millions of U.S. tax dollars into Gaza and the West Bank indeed increased terrorism and that they in fact expected it to do so. As set forth in the Amended Complaint ¶¶ 52–53, the defendants had actual knowledge

that U.S. anti-terrorism laws otherwise prohibited their decision to lavishly fund Gaza and the West Bank; accordingly, they requested and obtained a waiver from such laws and requirements. The Defendants' Report confirms this. Defendants' Report at 10.

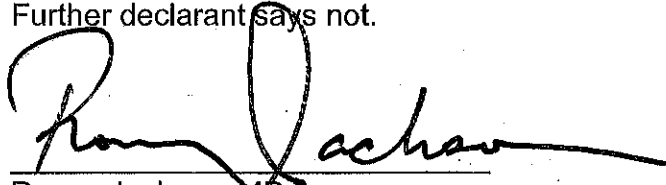
20. I further believe that the defendants are and have been aware that their obligation of approximately \$500 million in economic support funds for activities that are the primary obligation of the Palestinian Authority, even if such activities are conducted by supposed third parties, increases terrorism. Every dollar that the Palestinian Authority need not spend on education, health, or economic development is another dollar it may spend to incentivize terrorism through pay-to-slay, among other things. Although the Taylor Force Act prohibits the defendants from using economic support funds to directly benefit the Palestinian Authority because it supports terrorists, yet as outlined in the Defendants' Report at 10 and the Amended Complaint ¶ 68, they are committed to supporting the Palestinian Authority and pledged to "expand and deepen cooperation across a range of sectors."

21. Increased terrorism obviously raises the risk of serious harm and bodily injury to me and other U.S. citizens like me who visit Israel and worship or recreate there. However, I believe that the defendants believe that this increased risk is a necessary or even salutary result; politically, they are committed to funding programs and political policies that directly benefit the Palestinian Authority regardless of the cost to the victims of Palestinian terrorism.

22. I believe that the favorable resolution of this case, resulting in an end to the defendants' subsidies for Gaza and the West Bank, will reduce the Palestinian Authority's financial capability to subsidize terrorism, thereby reducing the risk of death,

physical injury, or other harm to me and to others whom the Taylor Force Act was enacted to protect.

Further declarant says not.



Ronny Jackson, MD

Exhibit 1



November 5, 2024

Transmittal of a DETERMINATION to Congress

Please find enclosed the following Determination and accompanying documentation from the Department of State. This material is for official Committee use only.

Department Report Number: 005621

Title of DETERMINATION: Palestine Liberation Organization (PLO) Commitments Compliance Act of 1989

Background: Pursuant to section 804 of the PLO Commitments Compliance Act of 1989 (title VIII, Foreign Relations Authorizations Act, Fiscal Years 1990 and 1991 (P.L. 101-246)), as amended; and sections 603 and 604 (Middle East Peace Commitments Act of 2002) and 699 of the Foreign Relations Authorization Act, Fiscal Year 2003 (P.L. 107-228) ("the Act"), enclosed is a report covering the period from April 1, 2023 to September 30, 2023. Pursuant to the President's Delegation dated April 30, 2009, the Secretary of State, through the Deputy Secretary of State, has made a Determination on Imposition and Waiver of Sanctions under sections 603 and 604 of the Act. Please find enclosed the Determination and accompanying documentation on this matter.

Recipients:

Speaker of the House of Representatives
House Foreign Affairs Committee
Senate Foreign Relations Committee

Sincerely,

A handwritten signature in blue ink, reading "Naz Durakoğlu".

Naz Durakoğlu
Assistant Secretary
Bureau of Legislative Affairs

Enclosure:

As stated.

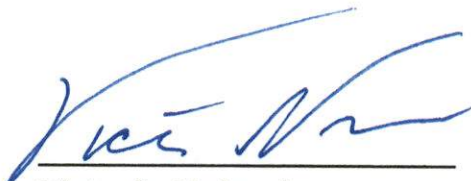
Determination on Imposition and Waiver of Sanctions under
Sections 603 and 604 of the Foreign Relations Authorization Act,
Fiscal Year 2003 (Public Law 107-228)

Consistent with the authority contained in section 604 of the Foreign Relations Authorization Act, Fiscal Year 2003 (Public Law 107-228) (the "Act"), the Presidential Memorandum dated April 30, 2009, and Department of State Delegation of Authority 513, and with reference to the determinations set out in the Report to Congress transmitted pursuant to section 603 of the Act regarding the extent of noncompliance by the Palestine Liberation Organization (PLO) or the Palestinian Authority with certain commitments, I hereby impose the sanction set out in section 604(a)(1), "Denial of Visas to PLO and Palestinian Authority Officials." This sanction is imposed for a period of 180 days from the date that the report under section 603 of the Act is transmitted to Congress or until such time as the next report under section 603 is required to be transmitted to Congress, whichever is later.

Furthermore, I hereby determine that it is in the national security interest of the United States to waive this sanction, pursuant to section 604(c) of the Act. This waiver shall be effective for a period of 180 days from the date hereof or until such time as the next report under section 603 of the Act is required to be transmitted to Congress, whichever is later.

This Determination shall be reported to Congress promptly and published in the Federal Register.

2/5/24
Date


Victoria Nuland
Acting Deputy Secretary of State



**Report to Congress on
Section 804 of the Palestine Liberation Organization Commitments
Compliance Act of 1989 ("PLOCCA")
(Title VIII, P.L. 101-246) and Sections 603-604 and 699 of
the Foreign Relations Authorization Act,
FY 2003 ("the Act") (P.L. 107-228)**

This report and related determinations are transmitted in accordance with the provisions cited above and cover the period from April 1, 2023 – September 30, 2023. This report describes compliance by the Palestine Liberation Organization (PLO) and the Palestinian Authority (PA), as appropriate, with respect to commitments specified in section 602(1) of the Act, and any additional commitments in Chairman Arafat's September 9, 1993 letters to Israeli Prime Minister Rabin and Norwegian Foreign Minister Holst and to those contained in, and resulting from, the good faith implementation of the Declaration of Principles. The commitments made by the PLO are cited in the Act. In addition, in 1998, the PLO, through the Palestine National Council, voted to affirm the PLO's decision to annul articles of the PLO covenant that deny Israel's right to exist and to strengthen cooperation with Israel on a wide range of security issues. As described in prior reports, both parties' further commitments are set out in the Wye River Memorandum of October 23, 1998 and the Sharm el-Sheikh Memorandum of September 4, 1999, which include ensuring the effective handling of any incident involving a threat or act of terrorism by cooperating in the exchange of information; coordinating policies; and taking measures to prevent acts of terrorism, violence, or incitement.

I. Overview of the Reporting Period

The Israeli Ministry of Defense retains responsibility for exercising Israel's security and civil administration in the West Bank. Under the Oslo Accords, the PA obtained full civil and security control of 17.5 percent (called Area A) of the West Bank and has a mandate to maintain law and order there. Israeli authorities retain responsibility for security in Areas B and C, as well as for security of Israelis living in settlements throughout the West Bank. During the reporting period, Israeli and Palestinian security forces coordinated throughout the West Bank to provide security for civilians, prevent violent attacks, arrest members of U.S. designated Foreign Terrorist Organizations (FTO) such as Hamas and Palestinian Islamic Jihad, and confiscate illegal weapons.

The period covered by this report continued to be characterized by an increase in West Bank violence, which resulted in Israeli and Palestinian deaths. As of September 2, 2023, approximately 196 Palestinians were killed by Israeli soldiers or settlers, and approximately 28 Israelis and one foreign tourist were killed by Palestinians during 2023. Israeli security forces (ISF) continued incursions into Area A of the West Bank throughout the reporting period, including a large-scale, two-day raid of the Jenin refugee camp, which resulted in 12 Palestinians killed, one ISF member dead, and 5,500 refugees temporarily displaced. Palestinian militants and criminal networks reportedly continued to acquire illegal and sophisticated weaponry, a trend PA officials blamed largely on Israeli weapons smugglers, as Israel maintains control of the West Bank's borders.

The PA accepted tax and customs revenues collected on its behalf by Israel during the reporting period, but this revenue was not sufficient to cover its expenses and the PA continues to be challenged by a deep and extended fiscal crisis. The PA has paid only 80-85 percent of salaries to its 150,000 public sector employees in the West Bank and Gaza, including security forces, since 2019 and throughout the reporting period, and will likely continue to pay reduced salaries at or near the 80 percent level absent new donor budget support. Significantly higher food prices exacerbated by

Russia's invasion of Ukraine, together with the reduced salary payments, have fueled public discontent, including significant, short-term strikes by teachers and health care workers. In this reporting period, arrears for the PA surpassed \$6 billion, including \$1 billion to the private sector, leading many suppliers to no longer provide goods and services to the PA. The ongoing salary cuts and non-payment of bills put additional negative pressure on the constrained Palestinian economy and increased the likelihood that public sector employees looked for financial opportunities elsewhere.

U.S.-designated FTO Hamas, which is not part of the PLO and has de facto control of Gaza, largely maintained understandings with Israel during the reporting period, although it praised terror attacks against Israelis that occurred during the reporting period. Palestinian Islamic Jihad (PIJ), which is also not part of the PLO, and other militant groups pose a threat to Israel's security and sporadically continued attacks during the reporting period, most notably in early May when PIJ claimed responsibility for firing over 1,500 rockets and mortars from Gaza toward Israel in response to the death of West Bank PIJ leader Khader Adnan in Israeli jail following a hunger strike. Militants also fired rockets and flew drones from Gaza sporadically throughout the reporting period, with various groups claiming responsibility.

The PA continued to make payments to the families of prisoners convicted of committing acts of terrorism and the families of individuals who were wounded or died while committing acts of terrorism, whom they dubbed "martyrs." Israeli government officials state these payments incentivize and reward terrorism.

PA President Mahmoud Abbas stoked outrage after news broke that he had delivered a speech featuring antisemitic tropes in late August. The comments included claims that Ashkenazi Jews were not descended from ancient Israelites and Hitler murdered Jews in the Holocaust because of their "role in society, which had to do with money."

II. Determinations as to Palestinian Compliance with Their Commitments Required by Section 603 of the Act

“Recognition of the right of the State of Israel to exist in peace and security”:

President Abbas has repeatedly stated a commitment to nonviolence, a two-state solution, and previous PLO commitments, including recognition of the right of the State of Israel to exist in peace. He reiterated his commitment to nonviolence during Palestinian political faction talks in Egypt on July 30, and cited Hamas’s refusal to commit to peaceful resistance as one reason for the talks’ failure.

In an August 10 trilateral meeting with Egypt President Sisi and Jordanian King Abdallah, President Abbas reaffirmed his intention to continue efforts with international powers and parties interested in peace to revive a serious peace process, based on the rules of international law, the references of the peace process, and within a mechanism and a clear and specific timetable.

President Abbas has publicly condemned the killing of Israeli civilians on several occasions and has also condemned terrorism in general terms, though he did not explicitly condemn every terrorist attack that occurred during the reporting period. PA and PLO officials at times made statements that honored terrorists that killed Israelis and often remained silent following terrorist attacks inside Israel. Praise and glorification of Palestinians who were suspected militants or who carried out attacks against Israelis was echoed in some media outlets, and some summer camps and schools in the West Bank remain named after Palestinians who committed attacks.

“Acceptance of United Nations Security Council Resolutions 242 and 338”:

The PA and PLO maintained their acceptance of UN Security Council Resolutions 242 and 338 as the basis for achieving a peaceful and comprehensive resolution of the Palestinian-Israeli conflict.

“Resolution of all outstanding issues in the conflict between the sides through negotiations and exclusively peaceful means:”

The PA [and PLO] reaffirmed their commitment to previous agreements and de-escalation at the February and March meetings in Aqaba, Jordan, and Sharm el-Sheikh, Egypt respectively, which were attended by the United States, Jordan, and Egypt. During a meeting with most political factions in Egypt on July 30, Abbas said, “We have practiced different forms of struggle at different stages in our national march, and we see today that peaceful popular resistance, at this stage, is the best way to continue our struggle and achieve our national goals.” He went on to describe peaceful resistance to Israeli occupation as a strategic choice.

“Renunciation of the use of terrorism and all other acts of violence and responsibility over all PLO elements and personnel in order to assure their compliance, prevent violations, and discipline violators”:

The PA took steps during this reporting period to prevent terrorism and other acts of violence in the West Bank areas under its control. However, ISF sometimes took action where they believed the efforts of Palestinian Security Forces (PASF) were inadequate, events that often led to further clashes that resulted in Palestinian injuries and deaths. The most significant example of this was Israel’s prolonged counterterrorism raid of the Jenin refugee camp on July 2-4, which temporarily displaced over 5,500 residents and resulted in the death of 12 Palestinians and one Israeli soldier.

Israeli authorities, among others, have underscored the importance of the PASF’s continued commitment to security coordination and steady performance in contributing to the maintenance of security in the West Bank. Areas of the West Bank, particularly Jenin and Nablus, are home to numerous armed groups, including armed political factions. Some of the violence in these areas is criminal and/or economic in nature, but at times it has been politically motivated. During the reporting period, Israel conducted frequent counterterrorism raids in Jenin and Nablus, particularly in refugee camps in both governates.

An Israeli military order criminalizing the facilitation of financial transactions that “support, promote, fund, or reward” terror came into effect in the West Bank and Gaza on December 31, 2020, and remains in effect. During the reporting period, the PA continued to utilize post office branches in the West Bank and Gaza to facilitate payments to prisoners and families of “martyrs” to avoid causing Palestinian banks to run afoul of the Israeli military order. However, senior PA/PLO officials publicly defended the payments and criticized Israel’s withholding of clearance and tax revenues, which Israel claimed were withheld in an amount equivalent to prisoner/“martyr” payments made by the PA.

During the reporting period, PASF continued to counter potential terrorist activity, though they also appeared to prioritize targeting political opponents, including student activists and social media personalities who criticized the PA. Some of those targeted were affiliated with U.S.-designated FTOs, but opposition to the Fatah-dominated PA appeared to be the primary concern. PASF often disperses funerals for Hamas and PIJ members in the West Bank as well as parades celebrating attacks against Israelis. On August 5, PASF dispersed a march in Jenin celebrating a terrorist attack in Tel Aviv. PASF allegedly shot live bullets and tear gas against marchers, injuring two Palestinian journalists.

The PA trial of 14 low-level PASF officers for the murder of political activist and PA-critic Nizar Banat during his arrest on June 24, 2021 in Hebron is ongoing. However, the Security Forces Justice Commission in Ramallah postponed his trial again to October 2.

The PA and PLO have had no effective security control in Gaza since 2007. Gaza remained under the de facto control of Hamas during this reporting period, though some PA ministers stated they continued to oversee their ministries’ staff in Gaza and sometimes worked out of their ministerial offices there several days each week. On August 10, President Abbas ordered the PA’s remaining four governors in Gaza to retire.

The Popular Front for the Liberation of Palestine (PFLP), a designated FTO since 1997, is the second largest PLO faction despite boycotting PLO meetings since 2018. PFLP has not held any leadership positions in the PLO since 2016. PFLP remained committed to terrorist activity through its armed apparatus, the Martyr Abu Ali Mustafa Brigades. Israeli security reportedly foiled efforts of a PFLP operative who was attempting to coordinate attacks on Israelis in the West Bank. PFLP General Command (GC), another PLO faction, was also designated as a FTO in 1997 and remains so; it last took credit for committing violence (rocket attacks on Israel from Lebanon) in 2015. PFLP GC also boycotted the latest PLO Central Committee meeting on February 6-7 and the political factions meeting in Egypt on July 30. PFLP's armed apparatus in Gaza operates jointly with Hamas, PIJ, and other terrorist groups in attacks against Israel. PFLP GC's armed apparatus is largely based in Lebanon and Syria. Other terrorist groups unaffiliated with the PLO, including Hamas and PIJ, remained active during the reporting period.

The Democratic Front for the Liberation of Palestine (DFLP), a specially designated global terror organization, is the third largest PLO faction and remains committed to terrorist activity. The DFLP claims responsibility for some of the rockets fired from Gaza into Israel.

Due in part to the fact that militants exploit the limits of PA/PLO control, the PA/PLO has not fully complied with commitments to assume responsibility over all elements and personnel to prevent violations and discipline violators.

III. Imposition of Sanction under Section 604

Pursuant to section 603 of the Act, the Deputy Secretary of State has determined that the PLO and the PA are not in compliance with certain commitments to prevent violations, discipline violators, and assume responsibility over all PLO elements, as noted in this report. Thus, the sanction specified in section 604(a)(1) of the Act – denial of visas for PLO and PA officials – has been imposed.

IV. Waiver of Sanction

An enduring and comprehensive peace between Israel and the Palestinians remains a longstanding goal of U.S. foreign policy. The Administration remains committed to advancing this objective. A blanket denial of visas to PLO members and PA officials, to include those whose travel to the United States to advance U.S. goals and objectives, is not consistent with the U.S. government's expressed willingness to partner with the PLO and PA leadership. For these reasons, the Acting Deputy Secretary has exercised the waiver authority granted by section 604(c) of the Act, based on her determination that such a waiver is in the national security interests of the United States. Please see the determination attached hereto.

V. Other PLOCCA Requirements

In addition to a report on compliance with the commitments detailed above, section 804(b) of the PLOCCA requires a report (covering the same reporting period) on the PLO's progress toward achievement of certain additional measures consistent with its commitments. Previous commitments, policy, and information from past PLOCCA reports remain as stated, unless new information is provided below.

- **Measures Taken to Prevent Violence and Punish Offenders:** PASF continued to prevent violence and punish offenders in the West Bank both on its own and in coordination with Israel. PASF continued to operate against terrorist groups in areas under PA security control in the West Bank (Area A) and to a lesser extent in areas under Israeli security control (Area B), coordinated through a standing joint mechanism. Offenders arrested by the PA are tried under the authority of the PA. Those apprehended by Israel are tried by Israeli civil courts if the person is an Israeli citizen or in Israeli military courts if they are Palestinian.
- **PLO Charter:** As mentioned in previous reports, the PLO complied with its commitment to amend its charter.

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- **Arab League Boycott of Israel:** As previously reported, the PLO and the PA officially disavowed the Arab League boycott.
- **Assistance to Palestinians:** Since April 2021, the United States has provided more than \$1.6 billion in development, economic, and humanitarian aid for Palestinian people, including more than \$1.1 billion in humanitarian assistance to the UN Relief and Works Agency for Palestine Refugees in the Near East (UNRWA). This includes humanitarian assistance to Palestinians living in the West Bank and Gaza to provide health care and education, and to address food insecurity, among other assistance. The United States continues to monitor and evaluate programs to ensure that U.S. assistance is provided consistent with requirements under relevant laws and to mitigate the risk that U.S. foreign assistance could be diverted for terrorist purposes.
- **Role of the Palestinian Legislative Council (PLC):** The PLC remains dissolved according to a 2018 Supreme Constitutional Court decision. [Note: The Supreme Constitutional Court was created by presidential decree in 2016.] PLC elections were scheduled to take place on May 22, 2021. President Abbas postponed them indefinitely on April 29, 2021, citing Israel's refusal to allow voting in East Jerusalem.
- **Additional PLOCCA Reporting Requirements:** There are no new developments in the cases of Abu al-Abbas, Force 17, or the Hawari group, because they reportedly no longer exist. Force 17 was previously dissolved and became the presidential guard force.

VI. Report on Transfer of Proscribed Weapons to Persons or Entities in the West Bank and Gaza: Terrorist groups and their sympathizers reportedly continued to smuggle weapons and cash into Gaza during the reporting period; the volume of smuggled goods and cash is unknown. There is no indication the Egyptian or Jordanian governments were complicit in the smuggling of weapons. The smuggling of weapons from Israel into the West Bank also remains a concern and is likely the largest source of weapons in

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the West Bank. Israel is increasingly blaming Iran and its proxies for the steady influx that has contributed to the uptick in deadly attacks over this reporting period and particularly since March 2022.

Egypt made efforts during this period to deter smuggling and violent extremist activity in the North Sinai, including security improvements at the Rafah border. The smuggling of arms into Gaza, however, remains a serious concern. Egyptian military operations against ISIS in the Sinai have been ongoing since at least 2013, when the security situation in the Sinai significantly deteriorated.

No basis exists to determine that smugglers along the Egypt/Gaza border received official support from any foreign person or entity to which U.S. assistance might be given or to which defense articles or services might be sold by the United States.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
AMARILLO DIVISION**

DR. RONNY JACKSON, STUART and ROBBIE
FORCE, and SARRI SINGER,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., et al.,

Civil Action No. 2:22-cv-241-Z

Defendants.

DECLARATION OF STUART FORCE

1. My name is Stuart Force. I am over eighteen and competent to make this declaration.

2. The information in this declaration is based on my personal knowledge, information, and belief.

3. I am a resident of Lakeway in the State of Texas and a citizen of the United States.

4. In 1973, I joined the United States Air Force, completing pilot training at Laughlin Air Force Base in Texas. Thereafter, I was assigned to Mather Air Force Base in California, where I flew the military version of the Boeing 737 until I was honorably discharged in 1980. I continued serving my country with the Colorado Air National Guard, after which I was a pilot for Southwest Airlines for 29 years.

5. My wife Robbi and are the parents of two children, Taylor and Kristen. My son Taylor, who we nicknamed "Tay," was an Eagle Scout. He attended New

Mexico Military Institute and then graduated from West Point in 2009, having been commissioned a 2nd Lieutenant in the United States Army. Taylor was assigned to Ft. Hood, where he rose to the rank of Captain. He deployed to active-duty combat in Iraq, where he served from September 2010 to August 2011, and then in Afghanistan from October 2012 to July 2013.

6. Taylor was honorably discharged in August 2014 and later attended Vanderbilt University, where he studied for his MBA. While on a University-sponsored trip in Israel, Taylor was walking with six classmates on a seaside boardwalk in Jaffa on March 8, 2016, when he and ten other individuals unknown to him were stabbed by Bashar Masalha, a 22-year-old Palestinian terrorist. Taylor, age 28, succumbed to the terrorist's heinous act in an ambulance en route to the hospital. Masalha was shot and killed by the police.

7. On that day, I received the worst call of my life from a Vanderbilt University chaplain who shared the horrible news with me that my son was murdered by a Palestinian terrorist. This forever changed my life and that of my wife, Robbi, and our daughter, Kristen. Though I was in complete shock, I will forever vividly recall that I asked the chaplain two questions: i. Are you sure it was Taylor and ii. Have you contacted my wife Robbi? The chaplain confirmed the victim was Taylor. She said she had not contacted Robbi because I was listed as Taylor's emergency contact. I told her that I needed to be the one to tell Robbi.

8. As I drove home, I struggled through my overwhelming grief as I tried to sort through how I was going to share this devastating news with Robbi. Telling her

that we had lost our wonderful son was the hardest thing I had ever done or will ever do, and it was horrible. We realized we needed to call Kristen in New York City before she saw the news reports about her beloved brother. That was the second hardest thing I've ever done or will ever do. We struggled as we called Kristen, who was in New York City at the time. Telling her that her brother, her best friend in the world, had been killed by a terrorist was so horrendous. There are no words to describe the disbelief and denial I felt then and continue to feel now.

9. Several months after we lost Taylor, I received an email from a gentleman in New York whom I did not know but who had obtained my email from my daughter, whose contact information he tracked down. He expressed his condolences for the loss of our son and asked if I would be amenable to receiving additional information about Taylor that was very disturbing.

10. When I responded that I was, he sent a second mail with two attachments and offered to speak to me by telephone if I wished to do so. One attachment was a YouTube video that was posted on the internet that showed Palestinians celebrating the death of my son and the proclamation that Taylor's killer was a martyr for the Palestinian Youth Movement. The other was a pdf translation of a document detailing a terrorism program run by the Palestinian Authority. The attachments were shocking and very upsetting to view.

11. The gentleman and I spoke by telephone soon after, and he explained that he had two people translate the pdf document into English from Arabic for accuracy. Referring to the program as "pay- to-slay," he explained that the Palestinian

Authority runs this terrorism program by incentivizing and rewarding Palestinians to commit acts of terror by paying terrorists to kill innocent Israelis and others. The greater the injury inflicted, the more the terrorist gets paid. If a terrorist is killed, his or her family will be paid from the Palestinian Authority's "families' martyrs fund." I understand that these monthly payments, which are awarded to the terrorist's family for life, are greater than a Palestinian's average monthly income.

12. I had no knowledge that this barbaric pay-to-slay program existed until then. I also had no idea Taylor's murderer Masalha was celebrated as a hero by the Palestinians or that the family of this Palestinian terrorist who murdered my son was being paid through this fund. I have also since learned that the official Facebook page for Fatah, the ruling party of the Palestinian Authority, called Masalha a "heroic Martyr" for killing my son. Knowing all this only compounded and continues to compound our unbearable grief and emotional and physical distress.

13. We were also shocked to learn that the United States sends millions of dollars every year to the Palestinian Authority and that the Palestinian Authority diverts funds to pay terrorists or their families under its pay-to-slay program. The gentleman also told me that he had shared the pdf document with Senator Graham, who was very upset to learn the United States was partially underwriting pay-to-slay. Senator Graham wanted to take action legislatively to stop this and asked if we would be involved in this effort given the devastating terrorist act perpetrated on my son Taylor.

14. I was glad we were given an opportunity to have a voice in trying to stop pay-to-slay, this horrible program that had taken our son away, and I wanted to be part of whatever Senator Graham had in mind. While I did not have direct knowledge about the legislative process, I believe it was and continues to be Robbi and my mission to tell members of Congress and others about my Tay and the barbaric terrorist act perpetrated on him and how terrible it is to have U.S. taxpayer money not just fund pay-to-slay but encourage it by these payments.

15. In September 2016, Robbi and I traveled to Washington, D.C., for a press conference to announce the introduction of the Taylor Force Act bill. We had no idea prior to the press conference that the bill was named after Taylor. When this was shared with us, Robbi and I broke down, crying and hugging each other as the memory of March 8 came flooding back to us. We were so grateful that something was being done in memory of our Taylor to stop taxpayer funds finance terrorism.

16. Robbi and I returned to Washington, D.C. in January 2017 for the re-introduction of the bill named after my son in the new Congress by Senator Graham and other senators. Additionally, Congressman Doug Lamborn introduced the House version of the Taylor Force Act at a press conference they held. We spent the next year on the road several times a month advocating for the Taylor Force legislation. We met with congressmen and senators and other government officials to make the legislation personal. Accompanied by Senator Graham, Congressman Lamborn, or the gentleman from New York on our visits, we shared Taylor while the others provided the details and goals of the bill. Robbi and I, or sometimes just I, also traveled to other states to

educate and ask for support for the legislation from groups and individuals. They were as upset as we were that taxpayer dollars supported terror payments and responded with tens of thousands of emails, texts, telephone calls, and personal contacts to their elected officials to voice the people's disgust that their tax dollars were being used to fund terrorism. We viewed all of this as our mission. I remember we named our final trip to D.C. the "Classmates Blitz" since five or six of Taylor's West Point classmates joined Robbi, Kristen, and me on Capitol Hill.

17. Robbi and I were elated on March 23, 2018, when the Taylor Force Act became law with President Trump's signature. The payments to the Palestinian Authority stopped and the incidents of terror attacks on innocent civilians decreased. That changed when the defendants resumed sending U.S. taxpayer dollars to the Palestinian Authority.

18. Three months after the Taylor Force Act was signed into law on March 23, 2018, in July 2018, I traveled to the State of Israel. I was concerned for my safety, but the purpose of the trip was very important to me. I was invited to observe the Knesset debate a bill similar in content to the Taylor Force Act. The bill passed and the members of the Knesset stood for a standing ovation. I cried in gratitude for their actions but also because of the emotional distress and grief I felt and continue to feel for the horrible death of my son.

19. In Spring 2023, Robbi and I traveled to Israel with dear friends who invited us to join them on a cruise that stopped in Ashdod and Haifa. We hired a driver and guide to be with us for safety. Even then, I felt unsafe and very aware of the

continued risk of injury or death to Robbi and me by Palestinian terrorists because the defendants are not enforcing the Taylor Force Act and are instead giving taxpayer funds to the Palestinian Authority, which only encourages more and more terrorism. I continue to feel this way now.

20. I made myself go to the seaside boardwalk where Taylor was stabbed, but I was very apprehensive. We took flowers, leaving some to the side of the boardwalk, throwing others into the ocean. It was extremely painful. We all joined in a circle—the guide who had been with Taylor, our friends, Robbi and I—and we “talked” to Tay, telling him we missed him dearly, that he was in our thoughts continually, and that he would be with us always.

21. Robbi and I were very aware of our surroundings as we stood at the place where our son was taken from us. She noticed there was a young man watching us while we were on the boardwalk. We felt very uneasy that we were being watched. Robbi pointed to a security camera on a pole nearby while looking at the man as if to say, “don’t try to do anything to us.” We well remembered the time we had thought our son Taylor would be safe in Israel, and instead, he was murdered. We looked over our shoulders the whole time we were there because we were fearful of being victims of Palestinian terrorism.

22. I want to travel to and spend some time in the State of Israel, but I am very concerned about going because there is a significant increase in the risk of injury and even death due to acts of Palestinian terrorism and I truly believe this will not stop until the Taylor Force Act is fully enforced. That is because I know the Palestinian

Authority teaches, encourages, and incites terrorism in its schools, mosques, and media outlets, and that Palestinian terrorists travel throughout Israel.

23. It is hard to fathom that knowing the Palestinian Authority actually encourages, facilitates, funds, and supports Palestinian terrorists to attack and kill innocents who live in or travel to Israel through its pay-to-slay program, defendants violate the very law named after my son passed to stop U.S. taxpayer funds supporting pay-to-slay. Every day I live the nightmare that my son was a victim of this terrorism and that the family of his killer is still being rewarded by getting paid money through the pay-to-slay families martyrs fund for the brutality that took my son's life.

24. It is very distressing to know defendants are well aware of the Palestinian Authority's pay-to-slay program that incentivizes and encourages terrorism by subsidizing terrorist attacks, yet defendants send U.S. taxpayer funds to the Palestinian Authority. Also, although the Palestinian Authority is supposedly opposed to Hamas, I am aware of a poll done by the Palestinian Center for Policy Survey and Research in 2023 that more than 70% of Palestinians believed Hamas' decision to launch the October 7 cross-border rampage in southern Israel was correct. I am also aware from the news that the Palestinian Authority's head, Abbas, has never spoken out against the October 7 rampage. Instead, the Palestinian Authority has been paying Hamas Palestinian terrorists for their October 7 slaughter, rewarding them or their families through the Palestinian Authority's pay-to-slay program. This has been reported in the news, so I believe the defendants must know this.

25. This rampage, involving murder, rape, mutilation, and binding and burning of live persons, as well as the taking of hostages, including Americans, was videotaped. I saw some videos and photos, and it was horrible to view. I am aware the U.S. designated Hamas a Foreign Terrorist Organization many years ago. I am also aware defendants know the Palestinian Authority pays Hamas to kill Israelis and tourists in Israel. Yet, the defendants knowingly continue to give U.S. taxpayer funds to the Palestinian Authority, the same entity that rewards the family of my son's murderer.

26. I believe that the defendants have actual knowledge of the Palestinian Authority's critical and extensive role in anti-Israel and antisemitic terrorism and that funding the Palestinian Authority increases the frequency and lethality of terrorist attacks against Israeli civilians and tourists in that country.

27. I also believe that the defendants know that sending U.S. taxpayer funds to the Palestinian Authority despite that the Palestinian Authority continues to incentivize acts of terror through pay-to-slay violates the law that bears the name of my son. This only makes it easier for the Palestinian Authority to continue its pay-to-slay program because it relieves the Palestinian Authority of its obligations to provide education, health, and other services, thereby directly benefitting the Palestinian Authority.

28. It is common sense that facilitating terrorism by helping to finance it clearly raises the risk of serious harm, bodily injury, and even death to me, my family,

and other U.S. citizens like me who want to visit Israel and worship or recreate there but am deterred from going because I am really fearful to do so because of this risk.

29. I believe that the favorable resolution of this case is to fully enforce the Taylor Force Act. This will result in an end to the defendants' subsidies for Gaza and the West Bank and will reduce the Palestinian Authority's financial capability to subsidize terrorism, thereby reducing the risk of death, physical injury, or other harm to me and to others whom the Taylor Force Act was enacted to protect from Palestinian terrorists. Until that happens, I know I am exposing myself to the increased risk of death, physical injury, or other harm should I go to Israel, and that acts as a significant deterrence to me.

30. Robbi and I remain traumatized by Taylor's brutal death. Recently, as Robbi was being released from a hospital, we informed the attending doctor, puzzled by the cause of her illness, about the loss of Taylor. We recounted the horror and our subsequent efforts with the Taylor Force Act. He diagnosed Robbi with PTSD. While stress levels may be hard to measure, their effect on Robbi's health is obvious and severe. I imagine that I, too, suffer from PTSD, but I have put my focus and energy on the mission. The mission consumes my attention, but I know that someday I will need to pay the emotional toll of Taylor's death.

Further declarant says not.

A handwritten signature in cursive script, appearing to read "Stuart Force", is written above a horizontal line.

Stuart Force

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
AMARILLO DIVISION**

DR. RONNY JACKSON, STUART and ROBBI
FORCE, and SARRI SINGER,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., et al.,

Civil Action No. 2:22-cv-241-Z

Defendants.

DECLARATION OF ROBBI FORCE

1. My name is Robbi Force. I am over eighteen and competent to make this declaration.

2. The information in this declaration is based on my personal knowledge, information, and belief.

3. I am a resident of Lakeway in the State of Texas and a citizen of the United States.

4. I attended Texas Technical University for several semesters and was a flight attendant with Southwest Airlines for 30 years.

5. My husband Stuart and I are the parents of two children, Taylor and Kristen. My son Taylor, who we nicknamed "Tay," was an Eagle Scout. He attended New Mexico Military Institute and then graduated from West Point in 2009, having been commissioned a 2nd Lieutenant in the United States Army. Taylor was assigned to Ft. Hood, where he rose to the rank of Captain. He deployed to active-duty combat

in Iraq, where he served from September 2010 to August 2011, and then in Afghanistan from October 2012 to July 2013.

6. Taylor was honorably discharged in August 2014 and later attended Vanderbilt University, where he studied for his MBA. While on a University-sponsored trip in Israel, Taylor was walking with six classmates on a seaside boardwalk in Jaffa on March 8, 2016 when he and ten other individuals unknown to him were stabbed by Bashar Masalha, a 22-year-old Palestinian terrorist. Taylor, age 28, succumbed to the terrorist's heinous act in an ambulance en route to the hospital. Masalha was shot and killed by the police.

7. On that day, Stuart received the worst call of our lives from a Vanderbilt University chaplain who shared the horrible news that my son was murdered by a Palestinian terrorist. This forever changed my life, that of my husband Stuart, and our daughter Kristen. I was not with Stuart when the chaplain called him. When he came home and told me, I remember saying, "it can't be Taylor." We hugged and cried until we realized that we needed to call Kristen, who was in New York City at the time. Telling her that her brother, her best friend in the world, had been killed by a terrorist was the hardest thing we have ever done. There are no words to describe the disbelief and denial I felt then and continue to feel now.

8. I have experienced and continue to experience severe physical and emotional illnesses ever since that horrific day when I learned we lost our beloved Tay. At one point, I was admitted to the hospital, and the doctor could not discern the cause of my illness. After Stuart and I explained our loss of Taylor and the deep emotional

stress we both have experienced, the doctor said I am suffering from PTSD. I tried therapy to no avail. The PTSD will remain with me forever.

9. Several months after we lost Taylor, Stuart received an email from a gentleman in New York whom we did not know but who had obtained Stuart's email from my daughter, whose contact information he tracked down. He expressed his condolences for the loss of our son and asked if Stuart would be amenable to receiving additional information about Taylor that was very disturbing. When Stuart responded that he was, the gentleman sent a second mail with two attachments and offered to speak to Stuart by telephone if he wished to do so. One attachment was a YouTube video that was posted on the internet that displayed Palestinians celebrating the death of my son and the proclamation that Taylor's killer was a martyr for the Palestinian Youth Movement. The other was a pdf translation of a document detailing a terrorism program run by the Palestinian Authority. The attachments were shocking and very upsetting to view.

10. Stuart spoke with the gentleman by telephone soon after, and he explained that he had two people translate the pdf document into English from Arabic for accuracy. Referring to the program as "pay-to-slay," he explained that the Palestinian Authority runs this terrorism program by incentivizing and rewarding Palestinians to commit acts of terror by paying terrorists to kill innocent Israelis and others. The greater the injury inflicted, the more the terrorist gets paid. If a terrorist is killed, his or her family will be paid from the Palestinian Authority's "families'

martyrs fund.” I understand that these monthly payments, which are awarded to the terrorist’s family for life, are greater than a Palestinian’s average monthly income.

11. I had no knowledge that this barbaric pay-to-slay program existed until then. I also had no idea Taylor’s murderer Masalha was celebrated as a hero by the Palestinians or that the family of this Palestinian terrorist who murdered my son was being paid through this fund. I have also since learned that the official Facebook page for Fatah, the ruling party of the Palestinian Authority, called Masalha a “heroic Martyr” for killing my son. Knowing all of this only compounded and continues to compound our unbearable grief and emotional and physical distress.

12. We were also shocked to learn that the United States sends millions of dollars every year to the Palestinian Authority and that the Palestinian Authority diverts funds to pay terrorists or their families under its pay-to-slay program. The gentleman also told Stuart that he had shared the pdf document with Senator Graham, who was very upset to learn the United States was partially unwriting pay-to-slay. Senator Graham wanted to take action legislatively to stop this and asked if we would be involved in this effort given the devastating terrorist act perpetrated on our Tay.

13. I was glad we were given an opportunity to have a voice in trying to stop pay-to-slay, this horrible program that had taken our son away, and I wanted to be part of whatever Senator Graham had in mind. While I did not have direct knowledge about the legislative process, I believe it was and continues to be Stuart’s and my job to tell members of Congress and others about my Tay and the barbaric terrorist act

perpetrated on him. They needed to know how terrible it is to have U.S. taxpayer money not just fund pay-to-slay but encourage it by these payments.

14. In September 2016, Stuart and I traveled to Washington, D.C., for a press conference to announce the introduction of the Taylor Force Act bill. We had no idea prior to the press conference that the bill was named after Taylor. When this was shared with us, Stuart and I broke down, crying and hugging each other as the memory of March 8 came flooding back to us. We were so grateful that something was being done in memory of our Taylor to stop taxpayer funds finance terrorism.

15. In January 2017, the bill was re-introduced in the Senate by Senator Graham, with Congressman Doug Lamborn introducing the House version of the Taylor Force Act bill, and Stuart and I traveled to Washington, D.C. For over a year thereafter, Stuart and I, or just he, traveled to Washington, D.C. monthly to share Tay's wonderful life and details about the Palestinian Authority's horrific pay-to-slay with members of Congress and seek their support for the legislation named in memory of our wonderful son Taylor. We also traveled frequently to other states to educate individuals and groups about Tay and the pay-to-slay program that incentivized his murder. They responded with tens of thousands of emails, letters, telephone calls, and personal contacts to their legislators to voice the people's disgust that their tax dollars were being used to fund terrorism. We viewed all of this as our mission. I remember we named our final trip to D.C. the "Classmates Blitz" since five or six of Taylor's West Point classmates joined Stuart, Kristen, and me on Capitol Hill.

16. Three months after the Taylor Force Act was signed into law on March 23, 2018, in July 2018, Stuart traveled to the State of Israel. He had been invited to observe the Knesset debate a bill similar in content to the Taylor Force Act. I did not go with Stuart because I was so emotionally injured then and continue to be from losing Taylor at the hands of a terrorist.

17. Despite my immense discomfort, in Spring 2023, I reluctantly agreed to travel to Israel with Stuart and dear friends who had invited us to join them on a cruise that stopped in Ashdod and Haifa. I knew then, as I do now, that there is an increased risk of harm in the form of injury or death by the defendants violating the Taylor Force Act. Therefore, we hired a driver and guide to be with us for safety. Even then, I felt unsafe and very aware of the continued risk of injury or death to Stuart and me by Palestinian terrorists because the defendants are not enforcing the Taylor Force Act and are instead giving taxpayer funds to the Palestinian Authority, which only encourages more and more terrorism. I continue to feel this way now.

18. I made myself go to the seaside boardwalk where Taylor was stabbed, but I was very apprehensive. We took flowers, leaving some to the side of the boardwalk, throwing others into the ocean. It was extremely painful. We all joined in a circle—the guide who had been with Taylor, our friends Stuart, and I—and we “talked” to Tay, telling him we missed him dearly, that he was in our thoughts continually, and that he would be with us always.

19. Stuart and I were very aware of our surroundings as we stood at the place our son was taken from us. I noticed there was a young man watching us while we

were on the boardwalk. We felt very uneasy that we were being watched. I vividly recall pointing to a security camera on a pole nearby while looking at the man as if to say, "don't try to do anything to us." We well remembered the time we had thought our son Taylor would be safe in Israel, and instead, he was murdered. We looked over our shoulders the whole time we were there because we were fearful of being victims of Palestinian terrorism.

20. While I very much want to return to Israel, it is very difficult for me to visit Israel because I am very concerned about the significant increase in the risk of injury or death due to acts of Palestinian terrorism that will not stop until the Taylor Force Act is fully enforced. That is because I know the Palestinian Authority teaches, encourages, and incites terrorism in its schools, mosques, and media outlets, and that Palestinian terrorists travel throughout Israel. That we thought our son would be safe and was killed only makes that feeling stronger.

21. It is hard to fathom that knowing the Palestinian Authority actually encourages, facilitates, funds, and supports Palestinian terrorists to attack and kill innocents who live in or travel to Israel through its pay-to-slay program, defendants violate the very law named after my son passed to stop U.S. taxpayer funds from supporting pay-to-slay. Every day I live the nightmare that my son was a victim of this terrorism and that the family of his killer is still being rewarded by getting paid money through the pay-to-slay families martyrs fund for the brutality that took my son's life.

22. It is very distressing to know defendants are well aware of the Palestinian Authority's pay-to-slay program that incentivizes and encourages terrorism by subsidizing terrorist attacks, yet defendants send U.S. taxpayer funds to the Palestinian Authority. Also, although the Palestinian Authority is supposedly opposed to Hamas, I am aware of a poll done by the Palestinian Center for Policy Survey and Research in 2023 that more than 70% of Palestinians believed Hamas' decision to launch the October 7 cross-border rampage in southern Israel was correct. Instead, the Palestinian Authority has been paying Hamas Palestinian terrorists for their October 7 slaughter, rewarding them or their families through the Palestinian Authority's pay-to-slay program. This has been reported in the news, so I must believe the defendants know this.

23. This rampage, involving murder, rape, mutilation, and binding and burning of live persons, as well as the taking of hostages, including Americans, was videotaped. I saw some videos and photos, and it was horrible to view. I am aware the U.S. designated Hamas a Foreign Terrorist Organization many years ago. I am also aware defendants know the Palestinian Authority pays Hamas to kill Israelis and tourists in Israel. Yet, the defendants knowingly continue to give U.S. taxpayer funds to the Palestinian Authority, the same entity that rewards the family of my son's murderer.

24. I believe that the defendants have actual knowledge of the Palestinian Authority's critical and extensive role in anti-Israel and antisemitic terrorism and that

funding the Palestinian Authority increases the frequency and lethality of terrorist attacks against Israeli civilians and tourists in that country.

25. I also believe that the defendants know that sending U.S. taxpayer funds to the Palestinian Authority despite that the Palestinian Authority continues to incentivize acts of terror through pay-to-slay violates the law that bears the name of my son. This only makes it easier for the Palestinian Authority to continue its pay-to-slay program because it relieves the Palestinian Authority of its obligations to provide education, health, and other services, thereby directly benefitting the Palestinian Authority.

26. It is common sense that facilitating terrorism by helping to finance it clearly raises the risk of serious harm, bodily injury, and even death to me, my family, and other U.S. citizens like me who want to visit Israel and worship or recreate there but am deterred from going because I am really fearful to do so because of this risk.

27. I believe that the favorable resolution of this case is to fully enforce the Taylor Force Act. This will result in an end to the defendants' subsidies for Gaza and the West Bank and will reduce the Palestinian Authority's financial capability to subsidize terrorism, thereby reducing the risk of death, physical injury, or other harm to me and to others whom the Taylor Force Act was enacted to protect from Palestinian terrorists. Until that happens, I know I am exposing myself to the increased risk of death, physical injury, or other harm should I go to Israel, and that acts as a significant deterrence to me.

Further declarant says not.

13/ Robbi Force
Robbi Force

**RIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
AMARILLO DIVISION**

DR. RONNY JACKSON, STUART and ROBBIE
FORCE, and SARRI SINGER,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., et al.,

Civil Action No. 2:22-cv-241-Z

Defendants.

DECLARATION OF SARRI SINGER

1. My name is Sarri Singer. I am over eighteen and competent to make this declaration.

2. The information in this declaration is based on my personal knowledge, information, and belief.

3. I am a resident of the State of New Jersey and a citizen of the United States.

4. I am a graduate of Touro University in New York, where I received my undergraduate degree in psychology. Prior to college, I had spent a gap year in Israel, as well as every winter break while I was in college. In the summer 1999, I staffed a summer program for high school students from North America on behalf of the National Conference of Synagogue Youth (NCSY). The following year, I became Director of Recruitment for NCSY summer programs and led trips in 2000 and 2001.

5. Following 9-11, in December 2001, I decided to leave NCSY and led a Birthright trip to Israel. I stayed in Israel and volunteered with non-profit organizations

assisting victims of terror. While volunteering, I later also took a position at a school in Har Nof, Jerusalem. Each day, I took two buses to work and two buses home.

6. On June 11, 2003, after attending work meetings, I was scheduled to meet a friend for dinner. I had to take two buses to the location where I was to meet my friend. I boarded the #14 bus during rush hour. The bus was very crowded. Initially, I stood. When we approached the next bus stop, I saw there were two seats that had opened up on the right side in the front section. While I normally sat in an aisle seat, for some reason I moved in and took the window seat. That decision saved my life.

7. I recall vividly placing my knapsack on the floor between my legs. I bent over in my seat to put my cell phone into my knapsack when I felt a huge shockwave hit my face. I remember trying to lift my hands to my face while the shockwave was pulling them down. I instinctively closed my eyes as a bomb detonated, which saved my eyesight. After the blast stopped, I couldn't open my left eye because it was swollen shut by an object that hit it. I was barely able to open my right eye when I saw the roof of the bus fall in. I can still visualize seeing a man's head in front of me, and he was not moving.

8. After the blast, there was a split second of silence and then my ears started ringing very loudly. I started screaming, and someone pulled me from the burning bus and took me to the sidewalk, where I lay until I was put in an ambulance and taken to the hospital. At the time, I had no idea the degree of my injuries as I was in shock. I later learned that shrapnel had penetrated my left shoulder, breaking my clavicle bone, and both of my eardrums were blown from the impact of the blast. My hair

was burned, and my face was burned and bruised. My legs were cut up from metal from the bus. I also had shrapnel in my mouth, which remains inoperable to this day.

9. I was taken by ambulance to Hadassah Ein Kerem Hospital, where I was operated on that same day. I was told that when a victim of a terrorist attack needs surgery, it is scheduled within five or six hours of the attack. This is because it is common practice for terrorists to dip nuts, bolts, nails, or other objects into rat poison before adhering them to a bomb to have maximum impact on the intended victims. Therefore, it is important for the victim to undergo surgery within five or six hours to minimize the effects of rat poison in the blood stream.

10. I remained in the hospital for approximately 11 days and then remained in Israel for five days before returning to New Jersey to be with my family. A nurse came to my apartment daily over those five days to help me. Once I returned to the United States, I was home-bound for several weeks. I underwent physical therapy for a year and a half. I have a constant hissing noise in my left ear, as well as shrapnel in my mouth. I also have PTSD and live with emotional pain daily.

11. I learned that the suicide bomber on my #14 bus was an 18-year-old Palestinian terrorist, a member of Hamas, who had been radicalized and indoctrinated on the Palestinian soccer field by Hamas. He was the eighth young man who had been recruited to carry out attacks by Hamas that year. He disguised himself as an ultra-Orthodox Jew and boarded my #14 bus wearing a suicide bomb vest. He injured over 100 of us and murdered seventeen innocent people including all those seated and standing around me.

12. On June 26, prior to my flight to the United States, I returned to the site of the bombing. This was extremely difficult for me to do but I knew from working with prior victims of terror that if I was going to return to Israel again, I needed to face the location that forever changed my life.

13. I am well aware the Palestinian Authority incentivizes and encourages terrorists to injure or kill innocent people, rewarding terrorists with money. Known as the Palestinian Authority's pay-to-slay program, if the terrorist dies when committing a terrorist act, the family is paid a monthly stipend for life from the Palestinian Authority's families martyr fund. The family of the Hamas terrorist who carried out the suicide bomb attack on my #14 bus has been paid hundreds of thousands of dollars by the Palestinian Authority as a bounty for the people he killed and injured. It is my understanding that the family continues to get paid from the Palestinian Authority's families martyr fund.

14. After I returned home, a month later in July 2003, I participated in a U.S. trip hosted by an Israeli non-profit organization for 25 Israeli victims of terror to travel through various cities on the East Coast to share their stories. I had worked on this trip earlier in the year in Israel when I had volunteered at the non-profit. While I had not planned to join the trip at the time, I had no idea that I, too, would be a victim of terror. I decided to be a part of the trip I had helped plan because I knew being with those victims would also help me emotionally.

15. I returned to Israel in September 2003 and continued working at the school in Har Nof until April 2004. I was able to also volunteer at non-profit organizations supporting victims of terror as my work hours were 8:00 am – 2:00 pm.

After I returned to the United States in June 2004, the Israeli non-profit One Family Fund, which supports terror victims and their families in Israel, hired me as the Director to set up their U.S. operations at that time. I held that position until February 2006. Following that, I worked as a consultant for a non-profit organization. Thereafter, in April 2007, I began working at Touro University as the Assistant Director of Career Services, being promoted to the Director of Career Services in June 2016. I also obtained my Masters in Peace and Conflict Resolution from Rutgers University in October 2021.

16. In 2012, while simultaneously working for Touro University, I founded the non-profit organization Strength to Strength. My drive to founding Strength to Strength arose from the trauma I had experienced on that horrible day of June 11, 2003, that will forever affect and haunt me. While I suffered after the terror attack in Israel, I was surrounded and was able to connect with terror victims' support organizations, as well as other victims of terror. Unfortunately, terror attacks were not infrequent in Israel. That was not the case in the United States, and I needed support for the trauma I was experiencing and continue to experience every day.

17. My organization, purely driven by volunteers, brings victims of terrorism together globally to deal with long-term psychological trauma through peer-to-peer support. We work with organizations in 16 different countries around the world that are working on the ground with civilian victims of terrorism and their families to help victims of terrorism around the world connect, share, and heal through various programs, retreats, and memorial events. (www.stosglobal.org)

18. I have traveled to Israel yearly for two to three weeks since 2007, mainly to meet with and support victims of terror. My trips typically include Jerusalem, Tel Aviv,

and Haifa. I know that there have been Palestinian terrorist attacks in all these cities, and elsewhere in Israel. I remain traumatized by the horrific terrorist attack on the bus, and I have not been able to take any public transportation in Israel since that date, nor do I think I will ever be able to do so. I will only travel by private transportation regardless of the distance of my travel, which is quite expensive. I am well aware that I have an increased and real risk of harm from a terrorist because of the Palestinian Authority's pay-to-slay program that the defendants are supporting by sending U.S. taxpayer funds.

19. I remain fearful of being a victim yet again. Despite this, it is my intention to return to Israel at least yearly, as I did this year, in prior years, and will this coming Summer 2025. It is a huge part of my life emotionally and professionally, and I know it is crucial that I go to Israel despite the heightened risk to me given my victims of terror work. I do not understand, however, that, given the increase of risk to innocent people—Israelis or Americans like me—of being victims of terror because of the Palestinian Authority's pay-to-slay program, why the defendants give the Palestinian Authority U.S. taxpayer monies.

20. The defendants' payments to the Palestinian Authority, despite pay-to-slay, continue even after the massacre by Palestinian Hamas terrorists on October 7. This only increases my fears as I have seen the horrific acts suffered by the victims of October 7. I know from newspaper reports that the Palestinian Authority has not disavowed the heinous acts committed by the Hamas Palestinian terrorists on October 7. To the contrary, the Palestinian Authority has paid and is paying terrorists or their families for these barbaric acts the world has seen in videos and photos. I believe that

defendants are aware the Palestinian Authority is using its pay-to-slay program to reward those October 7 terrorists, and that only increases my fears for safety when I am in Israel as terrorists are incentivized to commit acts of terror, especially given the defendants sending U.S. taxpayer funds to the Palestinian Authority.

21. It is extremely upsetting that I will forever live with the physical and emotional pain from the Palestinian terrorist attack, that the terrorist's family continues to get paid by the Palestinian Authority for his heinous act, and that the defendants continue to give U.S. taxpayer funds to the Palestinian Authority despite this knowledge.

22. It is my understanding that the defendants admit that terrorism increased between March 2022 and September 30, 2023. This correlates to the time that the defendants surged funds into Gaza and the West Bank.

23. If defendants followed the Taylor Force Act, the Palestinian Authority would have less money for pay-to-slay. Having less funds to pay terrorists would reduce terrorism. This decreased potential harm to me and others would, therefore, be significantly reduced.

24. However, funding the Palestinian Authority while its pay-to-slay program is in place means terrorism increases. This obviously raises the risk of serious harm, bodily injury, and potentially death to me and other U.S. citizens like me who visit Israel and worship or recreate there. The Taylor Force Act protects people like me.

25. I believe that the defendants view this increased risk to be a necessary and positive result; politically, they are committed to funding programs and political policies that directly benefit the Palestinian Authority regardless of the cost to past

victims of Palestinian terrorism like me or to future victims of terror attacks that are occurring daily.

26. Not a day goes by that I don't suffer pain and infirmity, anxiety, sleeplessness, and fear from the attack I survived. The fact that the defendants are knowingly and intentionally subsidizing the Palestinian Authority's pay-to-slay program, thereby funding the family of the terrorist who attacked me and supporting the terrorists who have murdered and maimed so many other innocent people, creates additional emotional pain and distress for me. I truly cannot understand why the defendants are helping the Palestinian Authority encourage and support more such attacks. As an American, I feel that my country should be protecting me wherever I am and not contributing to the ongoing cycle of violence of terrorism, especially not financially. This is particularly so when we have a federal law, the Taylor Force Act, in place which clearly acknowledges that pay-to-slay incentivizes and encourages terrorism. It should be enforced.

27. I believe that if I win this case, the defendants will be forced to stop their illegal subsidies to the Palestinian Authority. If those subsidies stop, then the Palestinian Authority will have much less money to encourage and incentivize acts of terror and to pay terrorists. This should reduce my risk of harm when I visit Israel.

28. No one should have to go through being a victim of a suicide bomb attack by a terrorist. Defendants exhibit such disregard for protecting the lives of American citizens or for following U.S. law. Instead, it seems to me that the defendants are more concerned about supporting Palestinian terrorists than they are about protecting us and enforcing the Taylor Force Act, named after a U.S. Army veteran who lost his life to a

Palestinian terrorist whose family still gets funded, just as the terrorist's family of my bus bombing.

Further declarant says not.


Sarri Singer