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October 7, 2025

Hon. Robert Sprague  
Treasurer of Ohio  
30 E Broad St., 9<sup>th</sup> Floor  
Columbus, OH 43215-3414  
Via email to: Robert.Sprague@tos.ohio.gov  
robert.sprague@gmail.com  
constituentaffairs@tos.ohio.gov

RE: Illegality of Ohio Treasurer Investments in Israel Bonds

Dear Mr. Sprague:

We are Ohio's No New Bonds campaign, numbering over 20 organizations statewide that work to align Ohio's public investments with fiscal responsibility and the public interest. We oppose your recurring investments of millions of taxpayer dollars to purchase tranches of Israel Bonds and ***we demand that you immediately and permanently cease and desist from any future purchases of Israel Bonds.*** Your recurring acts of investing Ohio taxpayer funds in Israel Bonds are acts of criminal lawbreaking. You have made Ohio's taxpayers accomplices with the governments of Israel and the United States in committing genocide, war crimes and human rights violations upon Palestinians in the Gaza Strip and in the West Bank. Israel's repayments of Israel Bonds come from revenues garnered from Israeli's lawbreaking settlements. Your knowing acceptance of these repayments suggests that you may be assisting the commission of felony money laundering.

### **I. Israel Bonds Directly Finance War Crimes, Human Rights Violations and Genocide**

Israel's government uses money from Israel Bonds to promote and perpetrate the commission of mass murder via purchases of weapons of war and the conduct of the genocide, complete with famine in Gaza.<sup>1</sup> Bond proceeds also go for the development and operation of illegal Israeli settlements in Palestine.<sup>2</sup> The Development Corporation for Israel exclusively sells Israel Bonds in the United States

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<sup>1</sup> "Israel's Ever-Expanding War Machine Is Financed Through International Bond Sales," Truthout (July 26, 2025), <https://truthout.org/articles/israels-ever-expanding-war-machine-is-financed-through-international-bond-sales/>

<sup>2</sup> United Nations: Include 'Israel Bonds' in Settlement Businesses Blacklist and Corporate Crimes Report - DAWN (January 10, 2025), <https://dawnmena.org/united-nations-include-israel-bonds-in-settlement-businesses-blacklist-an-corporate-crimes-report/>

and has promoted bond sales to finance Israel's illegal war on Iran.<sup>3</sup> "The "Development Corporation for Israel tripled its annual bond sales to funnel nearly \$5 billion to Israel since October 2023, while offering investors the option of sending the return on bond investments to charitable organizations supporting the Israeli military and the colonies."<sup>4</sup> Bond proceeds also underwrite seizures of land from Palestinian owners without cause, compensation and due process; and home demolitions by Israel's government in the West Bank of Palestine.<sup>5</sup>

Hence your investment decisions as Ohio Treasurer, Mr. Sprague, have made the State of Ohio an active criminal accomplice with Israel and the United States in the perpetration of human rights crimes, war crimes and genocide in violation of international law and U.S. federal law.<sup>6</sup>

Moreover, your repeated investments in Israel bonds violate your public trust and are by their nature categorically imprudent public fiduciary decisions. Your receipt and acceptance of interest, taxes or other fees charged to repay Israel Bonds aids and abets the crime of money laundering. The Bonds are redeemed by taxes and other charges imposed on Israeli settlers who reside in illegal settlements.<sup>7</sup> All Israeli settlements dating back to 1967 are illegal acts of occupation of Palestine. In 2024 the International Court of Justice ordered all Israeli settlements in Palestine to be vacated immediately and for reparations to be paid to the victims of Israel's nearly 60-year-long occupation.<sup>8</sup> Repayments on

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3 *Israel Bonds Supports Israel Amid Fight With Iran*, a televised interview titled, *Israel Bonds and Israel's Economic Resilience*. Video, <https://www.youtube.com/watch?v=g0zOP2vFWII&t=324s> (DCI President & CEO Dani Naveh explains how Israel Bonds support Israel amid its fight with Iran, highlights how Israel's economy continues to show resilience in the face of ongoing security threats, and emphasizes the essential role of investing in Israel Bonds); Also see, *Building Tomorrow, Together*, Israel Bonds promotional video, <https://www.youtube.com/watch?v=IFDaYSc4ksw&t=51s>

4 F. Albanese, "From economy of occupation to economy of genocide Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967," UN Special Rapporteur (July 2, 2025), <https://docs.un.org/en/A/HRC/59/23>

5 *Breaking the Bonds Between U.S. Local and State Public Funds and the Occupation of Palestine*, Internationalist Law Center (April 16, 2025), <https://www.palestinepolicy.org/news/breaking-the-bonds-between-u-s-local-and-state-public-funds-and-the-occupation-of-palestine> (proceeds from Israel Bonds are utilized to reimburse U.S. exports of weapons to Israel, which weapons are used to commit serious violations of international humanitarian law and international human rights law); also, see *United Nations: Include 'Israel Bonds' in Settlement Businesses Blacklist and Corporate Crimes Report*, Democracy for the Arab World Now (January 2025), <https://dawnmena.org/united-nations-include-israel-bonds-in-settlement-businesses-blacklist-and-corporate-crimes-report>

6 Each crime is prohibited under treaty law and customary international law, and provides for universal jurisdiction. See *Genocide: Convention on the Prevention and Punishment of the Crime of Genocide*, Dec. 9, 1948, S. Exec. Doc. O, 81-1 (1949), 78 U.N.T.S. 277 and under Article 6 of the Rome Statute of the International Criminal Court, UN Doc. A/CONF.183/9, July 17, 1998, 2187 U.N.T.S. 38544, art. 6 ("ICC Statute"); war crimes: 1949 Geneva Convention Relative to the Protection of Civilian Persons in Time of War, Aug. 12, 1949, 6 U.S.T. 3516, 75 U.N.T.S. 287, art. 147; ICC Statute, art. 8. Crimes against humanity are prohibited under customary international law and under the ICC Statute (Article 7). See also UN, *Framework of Analysis for Atrocity Crimes: A tool for prevention*, (2014), [Genocide-Framework-of-Analysis-English.pdf](#). Genocide, war crimes, and torture are also proscribed under U.S. federal criminal statutes, specifically 18 U.S.C. §§ 1091, 2441 and 2340-2340A.

7 *Proceeds of Crime: Israeli Settlements*, Global Legal Action Network (2025), <https://www.glanlaw.org/proceeds-israel-crimes> (Israel Bonds repaid using tax revenues collected from Israeli residents of illegal settlements, therefore the funds used for repayment are proceeds of crime)

Israel Bonds, then, are composed of ill-gotten profits and rents on illegally-appropriated Palestinian lands. Consequently, your receipt and acceptance of ill-gotten revenues from the government of Israel could comprise the crime of money laundering under federal and Ohio state law, *see* 18 U.S.C. § 1956, 26 U.S.C. § 60501 and O.R.C. § 1315.53.

## II. Your Investment Decisions Intentionally Support the Political Decisions of Israel

As an elected public fiduciary, you have grown Ohio's Israel Bond investments to some \$262,500,000. You're a recognized promoter – salesman -- of purchases of Israel Bonds by state and local governments. Your purchases of Israel Bonds as Treasurer reflect your apparent personal political beliefs, *i.e.*, that it is morally necessary to provide financial support for the political aims of Israel. You have repeatedly pursued fulfillment of your personal political beliefs with formal state investment policy that is summarized below.

- At an April 2023 meeting of the Israel Bonds International Leadership Conference in Washington, DC, you explained that purchasing Israel Bonds was important to you as a means of supporting Israel.<sup>9</sup>
- In August 2023, in response to a sales pitch from an executive at Israel Bonds, you reportedly agreed within 40 minutes to buy millions of dollars of Israel Bonds.<sup>10</sup> At the same time, you were planning to take a luxury trip to Israel where you would stay at a five-star hotel, attend a gala dinner, meet with Israeli army officers, tour Israeli military bases, and meet with the Israeli president, Isaac Herzog.
- In October 2023, you announced plans to purchase \$20 million in Israel Bonds.<sup>11</sup>
- In December 2023, you became the first chair of the newly formed Israel Bonds Government, Industry, and Financial Services Leadership Group, an organization dedicated to promoting financial support for Israel.<sup>12</sup> The group explicitly linked investments in Israel Bonds to providing essential support for Israel, a position you highlighted by saying: “*We can't stay neutral. It is very clear to me*

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8 The International Court of Justice determined, among other things, that Israel's occupation of the oPt (Occupied Palestinian Territory) is unlawful and must end, and that all nations of the world are under an obligation to not recognize the legality of Israel's presence in the oPt, and to cooperate in bringing an end to Israel's violations. *See Legal Consequences Arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, Including East Jerusalem, Advisory Opinion*, 2024 I.C.J 186, paras. 88-94, 267, 274-79 (19 July 2024), <https://www.icj-cij.org/sites/default/files/case-related/186/186-20240719-adv-01-00-en.pdf>.

9 *Ohio state treasurer: Israel Bonds are a valuable investment*, (Israel National News) (April 10, 2023), <https://www.israelnationalnews.com/news/369850>

10 *Inside the sophisticated sales operation funneling billions from US state and local governments to Israel* (International Consortium of Investigative Journalists) (July 25, 2024) <https://www.icij.or/news/2024/07/inside-the-sophisticated-sales-operation-funneling-billions-from-us-state-and-local-governments-to-israel/>

11 *Treasurer Sprague Announces Plans for \$20 Million Israel Bond Purchase* (Office of Robert Sprague, Ohio Treasurer) (October 11, 2023), <https://tos.ohio.gov/newsroom/article/treasurer-sprague-announces-plans-for-20-million-israel-bond-purchase/#:~:text=COLUMBUS%20-%20Ohio%20Treasurer%20Robert%20Sprague,investment%20for%20the%20Ohio%20Treasury>

12 *State treasurers, other elected officials join Israel Bonds leadership group* (JNS.org) ( December 20, 2023), <https://www.jns.org/wire/state-treasurers-other-elected-officials-join-israel-bonds-leadership-group/>

*that if we stay neutral, we are going to benefit Hamas. It benefits the aggressor, the attacker. And I think that is what they want—for everyone to stand on the sidelines and do nothing.”*

- In a May 2024 press release, you announced an additional \$30 million purchase of Israel Bonds and touted Ohio’s overall investments the bonds, noting that the Ohio Treasury held a total of \$262.5 million in Israel Bonds, which was “continuing Ohio’s standing as one of the largest government holders of these bonds in the United States.” You said this purchase brought Ohio’s total purchases of the bonds to \$357.5 million since you took office.<sup>13</sup>

- In December 2024, you again linked your investment of state funds in Israel Bonds to your personal support for Israel: You said, *“We need to stand with Israel because Israel has stood with the United States. We can’t let this pass, and so that’s why I was willing to make the investment in a critical time.”*<sup>14</sup>

- In February 2025, you announced an additional \$35 million investment in Israel Bonds.<sup>15</sup>

While you’re certainly entitled to hold strong personal opinions and beliefs about the Israel-Palestine controversy, you may not implement them through official governmental investment channels. Your insistence on doing so is more evidence of your intention to further genocide, war crimes and human rights violations by Israel against Palestine.

### **III. Ohio’s Investments In Israel Bonds Are Assisting Commission of Genocide and War Crimes in the Gaza Strip**

Two U.S. presidential administrations have participated in the Gaza genocide as a co-belligerent, providing weapons and weapons delivery systems, intelligence, and material aid and assistance to Israel of many forms. There are dozens of authoritative findings and rulings that an active genocide is being conducted in Gaza, and ethnic cleansing in the West Bank.<sup>16</sup> Yet as Ohio Treasurer,

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13 *Sprague Announces \$30 Million Israel Bond Purchase*, (Office of Robert Sprague, Ohio Treasurer) (May 3, 2024), <https://tos.ohio.gov/newsroom/article/sprague-announces-30-million-israel-bond-purchase/>

14 *Robert Sprague | 2024 Difference Makers* (columbusjewishnews.com) (December 5, 2024), [https://www.columbusjewishnews.com/differencemakers/2024\\_difference\\_makers/robert-sprague/article\\_aa1c419c-b19a-11ef-af77-ff6650a41252.html](https://www.columbusjewishnews.com/differencemakers/2024_difference_makers/robert-sprague/article_aa1c419c-b19a-11ef-af77-ff6650a41252.html)

15 *Treasurer Robert Sprague Announces \$35 Million Israel Bond Purchase* (Office of Robert Sprague, Ohio Treasurer) (February 2, 2025), <https://tos.ohio.gov/newsroom/article/treasurer-robert-sprague-announces-35-million-israel-bond-purchase/>

16 13 October 2023, Raz Segal, <https://jewishcurrents.org/a-textbook-case-of-genocide...>; 15 October 2023: *Public Statement: Over 800 Scholars Warn of Potential Genocide in Gaza* <https://twailr.com/public-statement-scholars-warn-of-potential-genocide-in-gaza/...>; 2 November: *UN experts call to prevent genocide*: <https://un.org/unispal/document/gaza-is-running-out-of-time-un-experts-warn-demanding-a-ceasefire-to-prevent-genocide/...>; 16 November: *UN experts call to prevent genocide*: <https://ohchr.org/en/press-releases/2023/11/gaza-un-experts-call-international-community-prevent-genocide-against...>; 16 November, William Schabas: [https://ccrjustice.org/sites/default/files/attach/2023/11/Declaration%20Expert%20William%20Schabas\\_w.pdf...](https://ccrjustice.org/sites/default/files/attach/2023/11/Declaration%20Expert%20William%20Schabas_w.pdf...); 16 November: *Holocaust and genocide scholars John Cox, Victoria Sanford, and Barry Trachtenberg declaration*, [https://ccrjustice.org/sites/default/files/attach/2023/11/Historians%20Declaration\\_w.pdf...](https://ccrjustice.org/sites/default/files/attach/2023/11/Historians%20Declaration_w.pdf...); 29 December, *South Africa submission to ICJ*: <https://icj-cij.org/sites/default/files/case-related/192/192-20231228-app-01-00-en.pdf...>; 29 May, *South Africa's dossier of evidence of Israel's genocidal intent*, the UN Security Council:

you've only increased investment of Ohio taxpayer money in this criminal enterprise. Since taking office in January 2025, the Trump administration, instead of pressing to stop war crimes violations, has made statements and acted as an accomplice in unlawful acts by Israeli forces.

On January 25, 2025, President Trump proposed that regarding Gaza, "just clean out that whole thing," effectively endorsing the mass forcible deportation of the Palestinian population from Gaza, a war crime and as ethnic cleansing, also act of genocide.<sup>17</sup> On February 9, 2025, while flying to New Orleans for the Super Bowl, Trump said to think of Gaza "as a big real estate site, and the United States is going to own it and we'll slowly — very slowly, we're in no rush — develop it." He described his

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<https://tinyurl.com/nb6ua4a5>; Martin Shaw, <https://x.com/martinshawx/status/1820389008880361676...>; UN Expert Francesca Albanese, *first report on the Genocide* (March 2024): <https://ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session55/advance-versions/a-hrc-55-73-auv.pdf...> UN Expert Francesca Albanese, *second report on the Genocide* (October 2024): <https://documents.un.org/doc/undoc/gen/n24/279/68/pdf/n2427968.pdf.....>; John Quigley, "Legal Standard for Genocide Intent: An Uphill Climb for Israel in Gaza Suit", 14 March 2024, EJIL: <https://ejiltalk.org/legal-standard-for-genocide-intent-an-uphill-climb-for-israel-in-gaza-suit/>; UK Judges' and Lawyers' Open Letter Concerning Gaza, 3 April 2024: <https://lawyersletter.uk>; Jinan Bastaki, "Gaza, Forced Displacement, and Genocide", EJIL, April 2024, <https://ejiltalk.org/gaza-forced-displacement-and-genocide/>; Nimer Sultany, "A Threshold Crossed: On Genocidal Intent and the Duty to Prevent Genocide in Palestine", May 2024: <https://tandfonline.com/doi/full/10.1080/14623528.2024.2351261...>; University Network for Human Rights report, May 2024: <https://humanrightsnetwork.org/publications/genocide-in-gaza...>; Aryeh Neier, NYRB, 6 June 2024: <https://nybooks.com/articles/2024/06/06/is-israel-committing-genocide-aryeh-neier/?srsltid=AfmBOopOf1xbflUcx3Bvo11nN7VEEL-J7IA6jCND9mhgWGeSUcLgQ9Y7...>; UN Commission of Inquiry, 10 June: Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023: <https://ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf...>; Oxfam, Water War Crimes report, July 2024: <https://oxfam.org/en/press-releases/israel-using-water-weapon-war-gaza-supply-plummets-94-creating-deadly-health...>; Omer Bartov, 13 August 2024: <https://theguardian.com/world/article/2024/aug/13/israel-gaza-historian-omer-bartov...>; Haaretz, "The Numbers Show: Gaza War Is One of the Bloodiest in the 21st Century", 14 August 2024: <https://haaretz.com/middle-east-news/palestinians/2024-08-14/ty-article-magazine/.premium/the-death-toll-in-gaza-is-bad-even-compared-to-the-wars-in-ukraine-iraq-and-myanmar/00000191-50c6-d6a2-a7dd-d1decf340000...>; Maryam Jamshidi, On Genocidal Intent, August 2024: <https://opiniojuris.org/2024/08/02/reflecting-on-genocidal-intent-in-the-icj-case/>; Forensic Architecture: cartographic analysis of the genocide in support of South Africa's case in the ICJ: <https://forensic-architecture.org/investigation/a-cartography-of-genocide...>; AOAV analysis that shows vast majority of killed in Gaza are civilians: <https://aoav.org.uk/2024/casualties-in-gaza-israels-claims-of-50-combatant-deaths-dont-add-up-at-least-74-of-the-dead-are-civilians/>; 10 October 2024: UN Commission of Inquiry: Israel's destruction of the health system in Gaza, <https://ohchr.org/en/press-releases/2024/10/un-commission-finds-war-crimes-and-crimes-against-humanity-israeli-attacks...>; 8 November 2024: UN Commission of Inquiry: 70 percent of verified victims (October - 30 April) were children and women: <https://ohchr.org/en/documents/reports/six-month-update-report-human-rights-situation-gaza-1-november-2023-30-april-2024...>; 12 November 2024: 8 aid organizations of the systematic violation of ICJ orders on humanitarian assistance, thereby establishing genocidal intent, <https://oxfam.org/en/press-releases/joint-release-israel-receives-failing-grade-us-demands-gaza...>; 14 November 2024: UN Special Committee Report <https://ohchr.org/en/press-releases/2024/11/un-special-committee-finds-israels-warfare-methods-gaza-consistent-genocide...>; North Gaza: 9 October 2024: 18 Aid organizations warn of dramatic escalation of humanitarian catastrophe in northern Gaza. <https://oxfam.org.uk/media/press-releases/aid-organisations-warn-of-dramatic-escalation-of-humanitarian>



vision for Gaza as excluding all Palestinians and creating a new “Riviera.”<sup>18</sup>

The ongoing atrocities being perpetrated directly against Palestinians by the Israeli military and government – with the unconditional support of the U.S. government through two presidencies -- include the deliberate inducement of famine, cynical manipulation of starvation conditions, destruction of the Gaza health care system and widespread deprivation of safe drinking water. These acts are occurring against a daily backdrop of military carnage against thousands of noncombatant Palestinians. And it is directly supported by the U.S. government as well as via your purchases of Israel Bonds.

Since Israel launched its military assault and siege on Gaza following the attacks of October 7, 2023, the Israeli military has killed at least 67,139 Palestinians in Gaza and injured over 169,583.<sup>19</sup> At least 2,605 Palestinians have been murdered while seeking aid from the Gaza Humanitarian Foundation.<sup>20</sup> Credible estimates of the Palestinian death and injury rates range much higher.<sup>21</sup> As of late August 2025, the daily toll of Israel’s assault and the enforced starvation of Gaza has averaged approximately 100 Palestinian deaths per day, combining casualties from aerial bombardment, targeted attacks, and deaths caused by the deliberate obstruction of food and aid.<sup>22</sup> Israel has destroyed or damaged 92% of the housing units, the majority of hospitals and health care centers, almost 90% of schools and a majority of universities, and the vast majority of the road network across Gaza, while destroying and controlling access to most water and sanitation facilities.<sup>23</sup>

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-catastrophe-following-further-mass-forced-displacement-of-civilians-in-northern-gaza/...; 15 October 2024, 38 organizations: “Northern Gaza is being wiped off the map”: <https://oxfam.org/en/press-releases/urgent-joint-statement-northern-gaza-being-erased-global-leaders-must-act-now-end...>; 1 November 2024: statement by 15 UN and humanitarian organizations: <http://bit.ly/40pLGqx> ; ‘You Feel Like You Are Subhuman:’ Israel’s Genocide Against Palestinians in Gaza, Amnesty International, 4 December 2024, <file:///C:/Users/tjlod/Downloads/MDE1586682024ENGLISH.pdf>

17 <https://apnews.com/article/trump-biden-israel-bomb-gaza-hamas-war-023b36984c6116c128b5e47f117bba2a?>

18 *Trump describes Gaza as a ‘big real estate site’ as he doubles down on plans to redevelop the enclave*, (CNN Politics), <https://www.cnn.com/2025/02/09/politics/trump-gaza-real-estate>

19 *Gaza: Hospitals receive 65 martyrs, death toll climbs to 67,139 martyrs*, <https://english.palinfo.com/news/2025/10/05/349139/>

20 *Id.*

21 The reported death toll is widely understood to be a severe undercount. See Rasha Khatib *et al.*, *Counting the Dead in Gaza: Difficult but Essential*, 404 *Lancet* 237 (2024) (letter to the editor) (doi:10.1016/S0140-6736(24)01169-3), [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(24\)01169-3/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(24)01169-3/fulltext) (projects possibly 186,000 deaths as of July 2024).

22 Medical Aid for Palestinians, Amnesty International UK & Médecins Sans Frontières/Doctors Without Borders, *Almost 4,000 Palestinians Killed by Israeli Forces in Gaza During Parliamentary Recess – Joint Call by Leading NGOs: ‘Stop the Genocide’*, Medical Aid for Palestinians (3 Sept. 2025), <https://www.map.org.uk/news/archive/post/1765-almost-4000-palestinians-killed-by-israeli-forces-in-gaza-during-parliamentary-recess-a-joint-call-by-leading-ngos-astopthegenocidea> (noting that from 26 July 2025 through September 1, 2025, Israel had killed 3,740 Palestinians – an average of 110 lives lost every day); also, see Spragat *et al.*, *Violent and Nonviolent Death Tolls for the Gaza War: New Primary Evidence*, <https://www.medrxiv.org/content/10.1101/2025.06.19.25329797v4#:~:text=https%3A//doi.org/10.1101/2025.06.19.25329797> (estimated 83,740 violent and nonviolent deaths in Gaza from October 7, 2023 through January 5, 2025).

23 Oxfam International, *Water War Crimes: How Israel has weaponised water in its military campaign in Gaza*, (July 2024), <https://oxfamlibrary.openrepository.com/bitstream/handle/10546/621609/bp-water-war->

Throughout Israel's 24-month assault on Gaza, Israel has deliberately limited access to basic necessities for life, which were already in short supply owing to Israel's closure and occupation of Gaza commencing in 2006. On October 9, 2023, Israel's then-Minister of Defense Yoav Gallant declared: "*I have ordered a complete siege on the Gaza Strip. There will be no electricity, no food, no fuel, everything is closed.*"<sup>24</sup> A plethora of Israeli government officials have uttered more than 500 incitements to genocide against Palestinians,<sup>25</sup> including demands for the use of nuclear weapons on the Palestinians.<sup>26</sup>

In 24 months of the most technologically sophisticated military assault in global history, Israel has made good on the promise of denying basic necessities of food, water, medical supplies, and other humanitarian aid to millions of noncombatants by tightly controlling humanitarian assistance through Gaza's borders at land, air and sea.

Malnutrition and starvation among Gaza's civilians was evident by December 2023.<sup>27</sup> July 2025 set a record as Gaza's deadliest month for child malnutrition deaths, with 24 children under five dying, representing 85% of all such deaths in 2025.<sup>28</sup> Over 500,000 people, one in four residents of Gaza, are facing the most severe level of famine.<sup>29</sup> All 320,000 Gazan children under five are at risk of acute malnutrition, increasing their vulnerability to childhood illnesses and potential long-term physical and mental health.<sup>30</sup> Gaza hospitals are overwhelmed, handling an average of eight mass casualty incidents

[crimes-180724-en.pdf;jsessionid=F0106B24E8CFAC29E814175755B16629?sequence=1](https://www.timesofisrael.com/crimes-180724-en.pdf;jsessionid=F0106B24E8CFAC29E814175755B16629?sequence=1) (Since October 7, 2023, Gazans have had only 4.74 litres of water per person per day for all uses, a 94% reduction in the amount of water available before and well below the internationally accepted minimum standard of 15 litres of water per person per day for basic survival in emergencies. Water supplied via the three Israeli Mekorot lines has been at only 22% of total supply capacity; from October 2023 to May 2024, the lines supplying Khan Younis and Gaza City were completely cut for 81% and 95% of the time, respectively. By 26 May 2024, water production from sources within the whole Gaza Strip had reduced by 84% due to destruction of water infrastructure and restrictions on fuel, electricity, and water and sanitation spare parts entering Gaza. By 3 June 2024, five water and sanitation infrastructures had been taken out of service every three days (1% per three days) by the bombardment. By 3 June 2024, Gaza City had lost nearly all its water production capacity, with 88% of its water wells, 100% of its brackish water desalination plants and 100% of its seawater desalination plants damaged or destroyed and put out of service. The Israeli military has destroyed the two main water quality testing laboratories (the first in November 2023 and the second on 21 March 2024) inside Gaza and restricted the entry of Oxfam water testing equipment. By 3 June 2024, the Israeli military had destroyed 100% of all water and sanitation warehouses in Gaza City and Khan Younis. By 3 June 2024, the Israeli military had destroyed 70% of all sewage pumps and by 26 June 2024, 100% of all wastewater treatment plants in Gaza.)

24 *Defense minister announces 'complete siege' of Gaza: No power, food or fuel*, *Times of Israel*, (October 9, 2023) [https://www.timesofisrael.com/liveblog\\_entry/defense-minister-announces-complete-siege-of-gaza-no-power-food-or-fuel/](https://www.timesofisrael.com/liveblog_entry/defense-minister-announces-complete-siege-of-gaza-no-power-food-or-fuel/)

25 <https://law4palestine.org/law-for-palestine-releases-database-with-500-instances-of-israeli-incitement-to-genocide-continuously-updated/>

26 *Commentary: Nuclear weapons, Israel, and Gaza*,

[https://www.icanw.org/commentary\\_nuclearweapons\\_israel\\_gaza](https://www.icanw.org/commentary_nuclearweapons_israel_gaza)

27 UN declares 'catastrophic' risk of famine in Gaza <https://www.thecanary.co/global/2023/12/22/gaza-un-famine/>

28 *UNICEF State of Palestine Humanitarian Situation Report No. 41 - July 2025, United Nations Childrens Emergency Fund (July 2025)*, <https://reliefweb.int/report/occupied-palestinian-territory/unicef-state-palestine-humanitarian-situation-report-no-41-july-2025>

29 *Id.*

30 *Id.*

per day, with rare diseases like Guillain-Barré Syndrome also claiming child lives.<sup>31</sup> The U.S. State Department’s own famine identification unit, the Famine Early Warning Systems Network, or FEWS, reported on August 22, 2025 that “Famine (IPC Phase 5) is ongoing in Gaza Governorate and possibly ongoing in North Gaza Governorate as of mid-August,” with “direct evidence that the Famine (IPC Phase 5) thresholds for starvation and acute malnutrition have been crossed, alongside reasonable evidence that mortality from the interaction of hunger and disease has also crossed the threshold.”<sup>32</sup> The FEWS report affirmed the other IPC findings, that in North Gaza Governorate (North Gaza), where evidence of acute malnutrition and mortality is more limited, direct evidence of starvation combined with mass displacement, the collapse of health and nutrition services, and humanitarian access constraints strongly suggest outcomes are similar to or worse than that observed in Gaza. Further, the State Department said that in Deir al-Balah and Khan Younis governorates, Famine (IPC Phase 5) was expected to materialize by the end of September unless immediate action is taken to increase the availability of and access to food, clean water, and nutrition and health supplies.”<sup>33</sup>

Following the establishment of a the militarized distribution system, the Gaza Humanitarian Foundation, operated by the Israeli military in the Gaza Strip on May 27, 2025, by October 4, 2025, at least 2,605 people – mostly young men and boys – were killed while seeking food in Gaza, near militarized distribution sites and along convoy supply routes.<sup>34</sup> Most appear to have been killed by the Israeli military, and there is no information to suggest that these people “were directly participating in hostilities or posed any threat” to Israeli forces or other people.<sup>35</sup>

This catastrophe accelerated following the end of a brief ceasefire in early 2025, when Israel escalated its siege on Gaza and imposed a total closure over an 11-week period from March to May 2025, during which it prohibited any aid from entering Gaza, leaving Gaza on the brink of complete starvation, while simultaneously intensifying military operations so as to cause forced relocation of the Palestinian population in northern Gaza to southern Gaza.<sup>36</sup>

A total of 13,549 people have been killed and 57,542 others have been injured since the Israeli occupation army resumed its genocidal war on Gaza on March 18, 2025.<sup>37</sup>

In November 2024, the International Criminal Court (“ICC”) Pre-Trial Chamber issued arrest warrants for Israel’s Prime Minister Benjamin Netanyahu and former Defense Minister Gallant for the crimes against humanity of persecution and the war crime of starvation.<sup>38</sup>

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31 *Id.*

32 *Famine is now occurring in northern Gaza and expected to expand to southern Gaza*, (FEWS Net), <https://fews.net/middle-east-and-asia/gaza/alert/august-2025>

33 *Id.*

34 *Gaza: Hospitals receive 65 martyrs, death toll climbs to 67,139 martyrs*, <https://english.palinfo.com/news/2025/10/05/349139/>

35 *OCHA Humanitarian Situation Update #315 – Gaza Strip*, <https://www.unocha.org/publications/report/occupied-palestinian-territory/humanitarian-situation-update-315-gaza-strip>

36 *In Private, Some Israeli Officers Admit That Gaza Is on the Brink of Starvation*, <https://www.nytimes.com/2025/05/13/world/middleeast/gaza-famine-starvation-israel.html>

37 See fn. 34 *supra*.

38 *Situation in the State of Palestine: ICC Pre-Trial Chamber I rejects the State of Israel’s challenges to jurisdiction and issues warrants of arrest for Benjamin Netanyahu and Yoav Gallant* | *International Criminal*



The Israel Defense Force's own internal analysis shows that 83% of the casualties caused by Israel are civilians, an unusually high rate particularly since Israel has waged the genocide with advanced technological surveillance and stupendous artificial intelligence methodologies.<sup>39</sup> The high proportion of civilian deaths bolsters the perception that civilian deaths have been a priority military objective and not merely a collateral effect of combat.<sup>40</sup>

#### **IV. The U.S. Government Is Partnering with Israel in Genocide And War Crimes In Gaza**

The nongovernmental watchdog Human Rights Watch has concluded that “Direct participation by US forces in military operations in Gaza since October 2023, including by providing intelligence for Israeli strikes and conducting extensive coordination and planning, has made the United States a party to the conflict between Israel and Palestinian armed groups. As a warring party, US forces could be jointly responsible for participating in laws-of-war violations by Israeli forces, and US personnel implicated could be held individually responsible for war crimes.”<sup>41</sup>

U.S. officials have acknowledged that since hostilities between Palestinian armed groups and Israel began on October 7, 2023, the United States has provided Israel with extensive actionable intelligence assisting in the striking of targets in Gaza, along with extensive coordination, planning and intelligence gathering with Israeli forces to target Hamas leaders. Two U.S. presidents have confirmed publicly that the US has been involved in the Israeli invasions of Gaza.<sup>42</sup>

Court, <https://www.icc-cpi.int/news/situation-state-palestine-icc-pre-trial-chamber-i-rejects-state-israels-challenges>

39 Israeli army database suggests at least 83% of Gaza dead were civilians, <https://www.972mag.com/israeli-intelligence-database-83-percent-civilians-militants>

40 *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel - Britain Palestine Project* (June 25, 2025)

<https://britainpalestineproject.org/report-of-the-independent-international-commission-of-inquiry-on-the-occupied-palestinian-territory-including-east-jerusalem-and-israel/> (Israeli security forces directed air strikes against scores of educational facilities, with no or inadequate advance warning, despite the presence of civilians inside some of the facilities at the time of attacks. . . many resulted in disproportionate harm to civilians. . . the Commission finds that Israeli security forces committed the war crimes of: (a) directing attacks against civilians; (b) willful killing (where civilians were killed due to the attacks); and (c) intentionally launching an attack in the knowledge that such attack would cause incidental loss of life or injury to civilians which would be clearly excessive in relation to the concrete and direct overall military advantage anticipated. Furthermore, the Commission finds that, in killing civilians sheltering in schools, Israeli security forces committed the crime against humanity of extermination.)

41 *Gaza: US Forces Can Be Liable for Assisting Israeli War Crimes* (Human Rights Watch) (August 26, 2025), <https://www.hrw.org/news/2025/08/26/gaza-us-forces-can-be-liable-for-assisting-israeli-war-crimes>

42 In October 2024, then-President Joe Biden said that he had “directed Special Operations personnel and our intelligence professionals to work side-by-side with their Israeli counterparts to help locate and track [Yahya] Sinwar and other Hamas leaders hiding in Gaza.”

<https://web.archive.org/web/20250119221241/https://www.whitehouse.gov/briefing-room/statements-releases/2024/10/17/statement-from-president-joe-biden-on-the-death-of-yahya-sinwar/>

After Israeli forces resumed airstrikes across Gaza on March 18, 2025, White House press secretary Karoline Leavitt told the media that “the Trump administration and the White House were consulted by the Israelis on their attacks in Gaza tonight.” More than 400 people were killed that night, mostly children and women. <https://www.reuters.com/world/middle-east/israel-consulted-us-its-strikes-gaza-white-house-told-fox->

The Trump administration has openly supported the initiation of the Gaza Humanitarian Foundation (GHF) as the sole food aid distributor in Gaza even as its aid distribution activities have routinely resulted in daily mass casualty incidents.<sup>43</sup> The GHF system is run by two US private subcontracted companies and claims to be independent of any government. Israeli forces have repeatedly opened fire on Palestinian civilians seeking assistance at these sites, causing nearly 2,000 casualties, including in acts that comprise war crimes.<sup>44</sup>

As an active perpetrating partner in the crimes in Gaza, the United States is responsible for internationally wrongful acts. The International Law Commission's<sup>45</sup> 2001 "Draft Articles on State Responsibility for Internationally Wrongful Acts"<sup>46</sup> are widely accepted as reflecting customary international law. The Articles provide that a state bears responsibility under international law if it "aids or assists" another state to commit an internationally wrongful act "with knowledge of the circumstances." Assistance alone can trigger state responsibility if it contributes "significantly" to the commission of a wrongful act and when a state provides material aid subsequently used to commit human rights violations.<sup>47</sup> U.S. provision of weapons to Israel, accompanied by the requisite "knowledge of the circumstances" of the internationally wrongful act, is a recognized violation of article 16 of the Draft Articles.

Both the Biden and second Trump administrations have provided massive quantities of arms and other security assistance to Israel.<sup>48</sup> The United States has transferred at least \$4.17 billion in arms to Israel between October 2023 through May 2025.<sup>49</sup> There have been, as of April 2025, 751 active Foreign Military Sales cases with Israel, valued at \$39.2 billion.<sup>50</sup> These transfers occurred despite official U.S. government awareness that Israeli forces were repeatedly committing serious laws-of-war violations, including war crimes. As of March 2024, the United States had approved more than 100 military sales, including thousands of small-diameter bombs, precision-guided munitions, bunker-buster bombs, and other munitions and materiel.<sup>51</sup> In September 2025, the Trump administration announced plans to sell nearly \$6 billion in arms and munitions to Israel, including \$3.8 billion for 30 AH-64 Apache helicopters (nearly doubling Israel's current stock), and \$1.9 billion for 3,200 infantry assault vehicles for the Israeli army.<sup>52</sup>

For these reasons, we conclude that your purchases of Israel Bonds are aiding and abetting the commission of war crimes, human rights violations and genocide. "In order to aid and abet another to commit a crime it is necessary [1] that a defendant in some sort associate himself with the venture, [2]

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news-2025-03-18/?utm\_source=chatgpt.com

43 <https://www.hrw.org/news/2025/08/01/gaza-israeli-killings-of-palestinians-seeking-food-are-war-crimes>

44 See fn. 15, *supra*.

45 The Commission is a United Nations entity.

46 [https://legal.un.org/ilc/texts/instruments/english/commentaries/9\\_6\\_2001.pdf](https://legal.un.org/ilc/texts/instruments/english/commentaries/9_6_2001.pdf)

47 *Id.*, ILC Draft Articles, Article 16, Commentary note 5.

48 <https://www.hrw.org/news/2025/02/04/suspend-arms-transfers-end-us-complicity-israeli-abuses>

49 <https://internationalpolicy.org/publications/security-assistance-monitor-special-report-arming-israels-atrocities-in-gaza/>

50 *Id.*

51 <https://archive.ph/zffk3>

52 Defense News, *Trump administration plans nearly \$6B in arms sales to Israel: Report* (September 19, 2025), <https://www.defensenews.com/global/mideast-africa/2025/09/19/trump-administration-plans-nearly-6b-in-arms-sales-to-israel-report/>

that he participate in it as in something that he wishes to bring about, [3] that he seek by his action to make it succeed,”<sup>53</sup> and [4] that someone commits the offense.<sup>54</sup> A defendant’s level of participation may be relatively minimal and need not advance every element of the crime.<sup>55</sup> As for seeking to make it succeed, the defendant must intend the commission of the underlying offense.<sup>56</sup>

Alternatively, as discussed below, your investments in Israel Bonds fulfill the elements of the crime of complicity.

## **V. Taxpayer Funds Are Helping to Finance the Commission of Genocide and War Crimes in Gaza; Knowing Purchases of Bond Instruments to Finance Them Is the Crime of Complicity**

Given the conclusive evidence that the United States is actively aiding and abetting the genocide in Gaza, your provision of financial means for Israel to commit genocide using vast U.S. weapons and munitions and intelligence support equals criminal complicity. “[T]here is no doubt that ‘complicity’, in the sense of Article III, paragraph (e) of the [Genocide] Convention, includes the provision of means to enable or facilitate the commission of the crime. . . .”<sup>57</sup> The accomplice does not have to share with the perpetrator the genocidal intent.<sup>58</sup> “[I]t is not necessary to show that the entity or

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53 *Nye & Nissen v. United States*, 336 U.S. 613, 619 (1949); *United States v. Tanco-Baez*, 942 F.3d 7, 27 (1st Cir. 2019); *United States v. Daniels*, 930 F.3d 393, 403 (5th Cir. 2019); *United States v. Sineneng-Smith*, 910 F.3d 461, 482 (9th Cir. 2018) (aiding and abetting elements are: “(1) that the accused had the specific intent to facilitate the commission of a crime by another, (2) that the accused had the requisite intent of the underlying substantive offense, (3) that the accused assisted or participated in the commission of the underlying substantive offense, and (4) that someone committed the underlying substantive offense.”).

54 *United States v. Martinez*, 921 F.3d 452, 472 (5th Cir. 2019) (“Nonetheless, the Government must first prove that someone committed the underlying substantive offense.’ Otherwise ‘there was no crime . . . to have abetted.’”); *Sineneng-Smith*, 910 F.3d at 482.

55 *Rosemond v. United States*, 572 U.S. 65, 72-3 (2014) (“The common law imposed aiding and abetting liability on a person (possessing the requisite intent) who facilitated any part—even though not every part—of a criminal venture. . . . [W]here several acts constitute[d] together one crime, if each [was] separately performed by a different individual . . . all [were] principals as to the whole. . . . Indeed . . . a person’s involvement in the crime could be not merely partial but minimal too: [t]he quantity [of assistance was] immaterial, so long as the accomplice did something to aid the crime. . . . That principle continues to govern aiding and abetting law under § 2: As almost every court of appeals has held, a defendant can be convicted as an aider and abettor without proof that he participated in each and every element of the offense. In proscribing aiding and abetting, Congress used language that comprehends all assistance rendered by words, acts, encouragement, support, or presence—even if that aid relates to only one (or some) of a crime’s phases or elements.”); *United States v. De Nieto*, 922 F.3d 669, 677-78 (5th Cir. 2019) (“The statute’s purview is broad, comprehending all assistance rendered by words, acts, encouragement, support, presence . . . even if that aid relates to only one (or some) of a crime’s phases or elements.”); *United States v. Daniel*, 887 F.3d 350, 356 (8th Cir. 2018) (“For a person to be convicted as an aider and abettor he must have facilitated any part—even though not every part—of a criminal venture.”); but see *United States v. Scott*, 892 F.3d 791, 798-99 (5th Cir. 2018) (“But a defendant need not commit each element of the substantive offense, so long as he aided and abetted each element.”)

56 *Rosemond*, 572 U.S. at 77-8 (“So for purposes of aiding and abetting law, a person who actively participates in a criminal scheme knowing its extent and character intends that scheme’s commission . . . [W]e think that means knowledge at a time the accomplice can do something with it—most notably, opt to walk away.”).

57 *Bosn. & Herz. v. Serb. & Montenegro*, 2007 I.C.J. ¶ 149 (emphasis added).

58 *Id.* at 181 (“[A]n accomplice to genocide need not necessarily possess the *dolus specialis* of genocide, namely the specific intent to destroy, in whole or in part, a national, ethnic, racial or religious group, as such.”).

individual intended the particular harm; it is sufficient that in providing logistical, financial or operational support, they had actual or constructive knowledge that the principal perpetrators were engaged in a given crime. . . .”<sup>59</sup> For individual criminal responsibility, complicity is accomplished by instigation, aiding and abetting or by procuring the means for the commission of the genocide, such as providing weapons or other instruments and means used in the commission of genocide, knowing that they would be used for that purpose.<sup>60</sup>

As noted above, you, as Ohio Treasurer, are procuring the means for the commission of war crimes, human rights violations and genocide in Gaza and the West Bank by making it possible for Israel to acquire weapons and munitions, objects and tools to commit those crimes, and you have done so with knowledge that you were fostering those crimes.

## **VI. Conclusion**

Based on the foregoing, the No New Bonds campaign accuses you, as Ohio Treasurer, of complicity in the perpetration of genocide, war crimes and human rights violations in Gaza and the West Bank. Further, by accepting repayment on behalf of the State of Israel Bonds proceeds, knowing that those proceeds are funded by taxes and other charges collected from residents and business enterprises profiting from illegal Israeli settlements, you are repeatedly committing acts as Treasurer that may comprise criminal money laundering.

We therefore demand that you cease and desist all prospective investments of Ohio taxpayer funds in Israel Bonds. Further, we are filing a formal complaint with the Ohio Inspector-General for a thorough investigation of your investment practices in line with the criminal law violations we believe you have committed.

Sincerely,

/s/ Terry J. Lodge  
Counsel for No New Bonds

cc: Hon. Randall J. Meyer, Office of the Inspector-General, State of Ohio, [watchdog@oig.ohio](mailto:watchdog@oig.ohio)

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<sup>59</sup> F. Albanese, “*From economy of occupation to economy of genocide Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967*,” UN Special Rapporteur (July 2, 2025), <https://docs.un.org/en/A/HRC/59/23> p. 33.

<sup>60</sup> *The Prosecutor v. Alfred Musema*, Case No. ICTR-96-13-T (International Criminal Tribunal for Rwanda) (January 27, 2000) (“Complicity by aiding or abetting implies a positive action which excludes, in principle, complicity by failure to act or omission. Procuring means is a common form of complicity. It covers those persons who procured weapons, instruments or any other means to be used in the commission of an offence, with the full knowledge that they would be used for such purposes.”).