



October 11, 2024

Ms. Maddie Lubeck
Hearing Clerk
Senate Committee on the Judiciary

Dear Ms. Lubeck,

Please find below my response to questions for the record from Senator Lindsey O. Graham for the September 17, 2024, hearing entitled “A Threat to Justice Everywhere: Stemming the Tide of Hate Crimes in America.”

Best regards,

A handwritten signature in black ink, appearing to read 'Maya Berry', with a stylized flourish at the end.

Maya Berry
Executive Director

Question #1: *In 2023, there was a reported 140% year-over-year increase in antisemitic incidents across the United States, the most in at least 45 years. Most of this dramatic increase took place following the October 7th Hamas attack on Israel. What steps should the Department of Justice take to ensure that antisemitic hate crimes are thoroughly reported and prosecuted?*

Answer: According to the FBI’s hate crime data, there were 1,832 anti-Jewish hate crimes in 2023. This is a dramatic 63% increase from the previous year, making 2023 the highest year on record for anti-Jewish hate crimes since the FBI began publishing such data in 1991.¹ Many of these incidents occurred in the last quarter of 2023, following October 7th.

Though not asked, but certainly related in that it is a community also impacted by the October 7th backlash effect, 2023 saw the highest-ever number of anti-Arab incidents since the FBI began collecting data on the category in 2015 and a 34% increase since 2022.²

While the question relates to actions that should be taken to respond to the increase in hate crimes targeting the Jewish American community, it is worth noting the FBI’s 2023 statistics also reveal a disturbing rise in bias-motivated incidents across the United States, affecting various racial, ethnic, religious, and LGBTQ+ communities. Overall, hate crimes increased significantly, and represented

¹ FED. BUREAU OF INVESTIGATION. 2023. Hate Crime Statistics Annual Report, 2023. Retrieved October 9, 2024 (<https://cde.ucr.cjis.gov/LATEST/webapp/#/pages/downloads>).

² *Id.*

the third consecutive year that incidents have increased to an all-time high, underscoring a broader trend of intolerance and violence.³ Anti-Black hate crimes continue to account for the highest number of reported incidents,⁴ while anti-Latino hate crimes saw a sharp rise,⁵ contributing to the overall surge in racially motivated violence. Anti-Muslim hate crimes saw a 49% increase between 2022 and 2023.⁶ Incidents targeting communities also reached a record high, reflecting the growing hostility towards LGBTQ+ individuals in many areas of public life.⁷

A 2021 threat assessment found “racially or ethnically motivated violent extremists who advocate for the superiority of the white race” to be one of the most lethal threats facing our country.⁸ The year with the highest number of violent anti-Jewish hate crime offenses was 2018, the same year an armed white supremacist fueled with hatred for Jews and immigrants murdered eleven worshippers at the Tree of Life synagogue in Pittsburgh, Pennsylvania. The stark numbers from the official FBI hate crime statistics, both the data related to the staggering increase in anti-Jewish hate crimes in 2023 and those demonstrating the continues increase against other targeted communities, highlight the urgent need for a comprehensive, collective approach. Indeed, civil rights organizations have advocated for a multi-faceted approach to hate crime prevention that not only ensures accurate reporting and prosecution of hate crimes, but also addresses the broader escalation of bias-motivated violence affecting *all* communities.⁹

Regarding actions the Department of Justice can take to improve the response to hate crime, the following would be helpful:

- **Continue Prioritizing the Response to Hate Crimes**

After a DOJ review of the department’s response to the increase in hate crime, Attorney General Merrick Garland issued internal guidance in May 2021 outlining steps DOJ should take to “enhance our current efforts to combat unlawful acts of hate by improving incident reporting, increasing law enforcement training and coordination at all levels of government, prioritizing community outreach, and making better use of civil enforcement mechanisms.”¹⁰ These significant steps were followed by the FBI elevating hate crimes to a Level 1 national threat in October 2021, increasing resources for hate crime responses and prioritizing hate crimes for all 56 FBI field offices. DOJ should remain focused on these efforts.

³ FED. BUREAU OF INVESTIGATION. 2023. Hate Crime Statistics Annual Report, 2023. Retrieved October 9, 2024 (<https://cde.ucr.cjis.gov/LATEST/webapp/#/pages/downloads>); Statement on the FBI’s 2023 Hate Crime Data Release: Highest Year on Record for Total Hate Incidents for Third Consecutive Year, ARAB AM. INST. (Sept. 23, 2024), <https://www.aaiusa.org/library/2023hatecrime>.

⁴ ARAB AM. INST. *Id.* (“Anti-Black or African American” incidents (3,027) accounted for the most single-bias hate crimes based on race, ethnicity, or ancestry.”).

⁵ FED. BUREAU OF INVESTIGATION, *supra* note 1.

⁶ *Id.*

⁷ *Id.*

⁸ *Fact Sheet: National Strategy for Countering Domestic Terrorism*, WHITE HOUSE (June 15, 2021), <https://www.whitehouse.gov/briefing-room/statements-releases/2021/06/15/fact-sheet-national-strategy-for-countering-domestic-terrorism/>.

⁹ *Letter from Civil Rights Organizations on Countering All Forms of Hate*, THE LEADERSHIP CONF. ON CIV. AND HUMAN RIGHTS (Jul 25, 2024) <https://civilrights.org/wp-content/uploads/2024/07/Leadership-Conference-Letter-to-Congressional-Leadership-on-Countering-Hate.pdf>.

¹⁰ *Memorandum for Department of Justice Employees*, DEPT. OF JUSTICE (May 27, 2021), <https://www.justice.gov/ag/file/1557621/dl?inline=1>.

- **Enhance and Standardize Federal Hate Crime Reporting**

Inconsistent reporting practices remain a major barrier to accurately tracking hate crimes, as many law enforcement agencies either underreport or fail to report hate crimes at all. Nearly 20% of cities with populations over 100,000 did not report to the national hate crime statistic system in 2022, leaving millions out of the new reporting system. In 2023, 60 agencies with populations over 100,000 and 80% of all reporting jurisdictions turned in “zero” data.¹¹ The DOJ should continue its focus on training for law enforcement to ensure consistent reporting of incidents across the country.

- **Support Mandatory Hate Crime Reporting**

The expansion of the Hate Crime Statistics Act and full participation in the National Incident-Based Reporting System (NIBRS) must remain a priority. Federal and local law enforcement agencies should be held accountable for their reporting practices, including conditioning federal funding on compliance with robust reporting requirements. Congress can contribute to the bettering of our hate crime prevention and reporting systems by supporting legislation that conditions federal funding for law enforcement agencies on credible reporting of hate crimes, such as the proposed Improving Reporting to Prevent Hate Act (IRPHA).¹² Incentivizing agencies to prioritize accurate hate crime reporting must be a priority for DOJ and lawmakers.

- **Focus on Strengthening Protections Across All Communities**

The DOJ must take a holistic approach to combating hate crimes, ensuring that all communities impacted by hate are supported and protected. For example, the rise in anti-Jewish and anti-Arab hate crimes after October 7th may warrant the development of targeted outreach that address the specific needs of each community. However, an effective approach must also recognize the interconnectedness of hate-based violence and respond accordingly, bringing communities out of isolation and into partnership with each other. Community-based approaches to hate prevention, such as the grants made available under the Jabara-Heyer NO HATE Act, can help communities heal and foster improved relations with law enforcement to increase reporting.¹³

- **Continue Community Engagement and Education**

Collaboration with community groups must continue, including outreach to civil rights organizations, religious communities, and local advocacy groups. Strengthening relationships with diverse communities will enable law enforcement to better understand and respond to the specific forms of hate crime affecting each group. Congress and the DOJ should continue to support the full funding of grant initiatives through Matthew Shepard and James Byrd, Jr. Hate Crimes Program, which supports state, local, and tribal law enforcement in outreach and education about hate crime to affected communities.¹⁴ Additionally, expansion of the Jabara-Heyer State Run Hate Crimes Hotline Program, allowing for more states to

¹¹ ARAB AM. INST. *Id.* (Table 14 Hate Crime Zero Data Reported).

¹² Improving Reporting to Prevent Hate Act, H.R.7648, 118th Cong. (2023-2024).

¹³ *Community-based Approaches to Prevent and Address Hate Crimes Program*, DEPT. OF JUSTICE (Aug. 20, 2024), <https://bja.ojp.gov/program/prevent-address-hate-crimes/overview>.

¹⁴ *Matthew Shepard and James Byrd, Jr. Hate Crimes Program*, DEPT. OF JUSTICE (Aug. 20, 2024), <https://bja.ojp.gov/program/shepard-byrd-hate-crimes-program/overview>.

create a statewide reporting hub would allow reporting to be more accessible to more victims and help streamline reporting efforts across the state.¹⁵

A Note Regarding the Data Cited in Questions #1:

Accurate hate crime data collection is fundamental to the fight against hate. While flawed, state and federal hate crime reporting data remain the only source of credible information on hate crimes targeting communities, including the rise of anti-Jewish hate crimes. The 140% increase cited in the question is not from the FBI's hate crime statistics, but rather a data set from a report produced by the Anti-Defamation League (ADL).¹⁶ The issues associated with the data collection methods of non-governmental organizations such as the ADL exemplify the need to rely on federal data.

The ADL has adopted a definition of antisemitism that includes criticism of the state of Israel or the political ideology of Zionism, significantly harming the utility of its statistics.¹⁷ This broader categorization can lead to inaccuracies in understanding the nature and scope of antisemitism. In examining the organization's 2023 report on hate incidents, since the Oct. 7th attack, the ADL made a midyear-change to its collection methodology to include "certain expressions of opposition to Zionism, as well as support for resistance against Israel or Zionists that could be perceived as supporting terrorism or attacks on Jews, Israelis or Zionists."¹⁸ The report itself notes that 15% of the increase from 2022-23 was due to the updated methodology, which picked up many of the nonviolent protests led by groups such as Jewish Voice for Peace for political chants during protected First Amendment activity.¹⁹ Additionally, ADL's methodology previously only included incidents if there was a "clear victim" and incidents that involved anti-Israel rhetoric had to target Jewish institutions or feed into anti-Jewish tropes. However, the "clear victim" standard shifted, leading to the publishing of data that include non-violent protests and political statements as antisemitic incidents.²⁰ As a result, the ADL's 2023 data is not only incomparable month-to-month, but also unable to give a picture of incidents year-to-year.

Further, the inclusion of First Amendment protected activities into its data collection have severely damaged the credibility of ADL's reporting, undermining the ability to accurately track true antisemitic hate crimes. The potential for distorted data can harm efforts to protect Jewish American communities by diverting resources and attention from genuine anti-Jewish hate crimes. This must be a central consideration at any time, but it is particularly important as our country is experiencing an increase in antisemitic hate crimes. Policymakers must be mindful of these nuances when

¹⁵ *Jabara-Heyer Hate Crime Reporting Hotline Program Overview*, OFFICE FOR VICTIMS OF CRIME, OFFICE OF JUSTICE PROGRAMS, DEPT. OF JUSTICE, <https://ovc.ojp.gov/topics/hate-crimes/jabara-heyer-state-run-hate-crimes-hotline-program-overview.pdf> (last visited Oct. 10, 2024).

¹⁶ *Audit of Antisemitic Incidents in 2023*, ANTI-DEFAMATION LEAGUE (Apr. 16, 2024), <https://www.adl.org/resources/report/audit-antisemitic-incidents-2023>.

¹⁷ *FAQ: Countering Antisemitism Act*, ARAB AM. INST. 9-10 (2023), <https://static1.squarespace.com/static/5faecb8fb23a85370058aed8/t/6646676818fcc1452330b1a7/1715890024848/CA.FAQ.24.pdf>.

¹⁸ *Audit of Antisemitic Incidents in 2023*, ANTI-DEFAMATION LEAGUE (Apr. 16, 2024), <https://www.adl.org/resources/report/audit-antisemitic-incidents-2023>.

¹⁹ *Id.*

²⁰ *Id.* ("Of the 8,873 incidents tabulated in 2023, 3,162 (36% of the total) contained elements referencing Israel or Zionism . . . The majority (2,526) of Israel-related incidents took the form of harassment, including 1,352 incidents that took place at anti-Israel protests.").

analyzing data on hate incidents, including antisemitic hate incidents.²¹ The FBI hate crime statistics are required to adhere to rigorous, transparent, and consistent standards, guaranteeing accountability and ensuring that decisions about hate crime prevention are informed by unbiased and reliable information.

Question #2: In 2023, 1 in every 10 antisemitic incidents took place at a school or on a college campus. What steps should the Department of Education take to make campuses safe for Jewish students and faculty?

Answer: According to the FBI's 2023 hate crime statistics, 6.8% of antisemitic incidents took place on college or university campuses.²² This marks a nearly 2% increase from 2022, when 4.4% of antisemitic incidents occurred on campuses.²³ It should go without saying that all students deserve to pursue their education without being subjected to a hostile environment.

While the Department of Education (ED) is not a law enforcement agency and does not have the authority to prosecute hate crimes, it plays a crucial role in creating educational environments for all students, free from discrimination. It is crucial to remember that robust mechanisms and safeguards already exist within the Department of Education to address instances of antisemitism, anti-Arab racism, and all forms of hate on college campuses.²⁴ Presently, there are ongoing Title VI cases at numerous universities demonstrating the Department's commitment to upholding the civil rights of all students, including Jewish American students.²⁵ By approaching incidents of discrimination seriously via the rigorous and established procedures set in place, allegations of discrimination can be thoroughly investigated and addressed, not politicized.

The Department of Education provides various mechanisms for students and faculty to report incidents of discrimination, ensuring their voices are heard and their concerns addressed. Students can report incidents through the following channels:

1. **Office for Civil Rights (OCR):** The OCR investigates complaints of discrimination based on race, color, national origin, including shared ancestry or ethnic characteristics, sex, disability, and age in educational programs and activities that receive federal funding. Students can file complaints with OCR when they believe they have experienced discrimination, harassment, or a hostile environment based on their identity. OCR then has the ability to investigate the school's handling of the incidents and existing policies,

²¹ Kai Wiggins, *How to Read Two Data Sets on Domestic Antisemitism*, LAWFARE (June 4, 2024), <https://www.lawfaremedia.org/article/how-to-read-two-data-sets-on-domestic-antisemitism>.

²² FED. BUREAU OF INVESTIGATION, *supra* note 1.

²³ *Reported Hate Crime at Schools: 2018-2022*, FED. BUREAU OF INVESTIGATION, DEPT. OF JUST. 9 (2024), <https://www.justice.gov/hatecrimes/reported-hate-crimes-schools/dl>.

²⁴ 42 U.S.C. 2000d, *et seq.*

²⁵ *Pending Cases Currently Under Investigation at Elementary-Secondary and Post-Secondary Schools*, U.S. DEPT. OF ED., https://ocras.ed.gov/open-investigations?field_ois_state=All&field_ois_discrimination_statute=All&field_ois_type_of_discrimination=711&items_per_page=20&field_ois_institution=&field_ois_institution_type=All&field_open_investigation_date_1=&field_open_investigation_date_2=&field_open_investigation_date_3=&page=2 (last visited Oct.10, 2024).

employing consent decrees where needed to compel school compliance with actions and policies that eliminate discrimination on their campus.

2. **Campus Title IX Coordinators:** Most colleges and universities have Title IX coordinators responsible for overseeing the institution's compliance with Title IX, which prohibits sex-based discrimination. These coordinators can also address cases of harassment that create a hostile educational environment.
3. **Campus Safety and Reporting Systems:** Many institutions have established their own reporting systems, including anonymous reporting options, where students can disclose incidents of discrimination. The Department of Education encourages institutions to create transparent and accessible processes for reporting and responding to such incidents.

The Department of Education's future efforts can focus on ensuring students have knowledge of and access to the existent channels to report incidents. Additional steps can include:

- **Increase Funding for the Office for Civil Rights (OCR):** Congress should increase funding for ED's Office of Civil Rights.²⁶ Enhancing OCR's funding is essential to enable it to effectively investigate complaints, conduct outreach, and implement educational initiatives aimed at preventing discrimination and hate incidents on campuses. Increased resources will allow OCR to support institutions in developing policies and training programs that promote understanding and tolerance. It will also offer the Department the ability to ensure each complaint is handled in a timely and complete manner.
- **Develop Comprehensive Training Programs:** The Department of Education should work with colleges and universities to ensure these institutions have the training and technical assistance to comply with guidance and regulations addressing discrimination.
- **Promote a Culture of Inclusivity:** The Department of Education should encourage colleges and universities to adopt policies that actively promote inclusivity and respect for all.²⁷ This can be achieved by funding initiatives that foster dialogue among diverse student groups and provide resources for cultural competency training.
- **Enforce Anti-Discrimination Policies:** The Department should issue clear guidelines that reinforce the responsibility of educational institutions to create nondiscriminatory environments for all students. Examples include the continued guidance on Title VI complaints related to shared ancestry,²⁸ and timely reminders to educational institutions on their duties to protect students.

²⁶ *Letter Urging Congress to Double the Funding for the Department of Education's Office for Civil Rights*, THE LEADERSHIP CONF. ON CIV. AND HUMAN RIGHTS (Feb. 14, 2024) <https://civilrights.org/resource/letter-urging-congress-to-double-funding-for-the-department-of-education-office-for-civil-rights/>.

²⁷ *Strengthening Diversity, Equity, and Inclusion in Higher Education*, AM. COUNCIL ON ED., <https://www.acenet.edu/Documents/ace-dei-cop-strengthening-dei.pdf> (last visited Oct. 10, 2024).

²⁸ *Dear Colleague Letter: Discrimination, including Harassment, Based on Shared Ancestry or Ethnic Characteristics*, DEPT. OF ED. (NOV. 7, 2023) <https://www.ed.gov/sites/ed/files/about/offices/list/ocr/letters/colleague-202311-discrimination-harassment-shared-ancestry.pdf>.

- **Improve and Expand Collection and Accessibility of Disaggregated Data from the Civil Rights Data Collection (CRDC):** The Civil Rights Data Collection (CRDC) is essential to this work, equipping schools with the insights needed to address disparities and ensure fair treatment for all students.²⁹ Adequate funding is crucial for OCR to maintain consistent, reliable data collection; without it, the scope and accessibility of the CRDC are compromised, making it harder to meet legal obligations and advance educational equity.

While the Department of Education does not have prosecutorial authority for instances of hate crime as covered by the hearing, it holds a vital role in ensuring that all students can pursue their education in an environment free of discrimination.

Question #3: *In August, a United Nations spokesperson announced that the U.N. had found sufficient evidence to conclude that 9 individuals employed by the United Nations Relief and Works Agency for Palestinian Refugees were involved in the October 7th Hamas attack on Israel. Given this finding, do you believe Congress erred in its decision to not appropriate any funding for UNRWA in fiscal year 2024?*

Answer: As I expressed during my testimony, it is profoundly confusing as to why matters related to foreign policy were introduced into a hearing focused on hate crimes entitled, "A Threat to Justice Everywhere: Stemming the Tide of Hate Crimes in America." While I do not believe a question related to the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) is relevant to formulating a better policy response to hate crime, I am happy to answer it.

I do believe Congress erred by not appropriate funding to UNRWA in fiscal year 2024.

First, the United Nation's Office of Internal Oversight Services (OIOS) conducted an internal investigation into the misconduct allegations against UNRWA staff. Contrary to the assertion in the question, the OIOS investigation did not conclude that nine individuals employed by UNRWA "were involved" in the attacks of October 7th. Rather, the OIOS stated, "the evidence – if authenticated and corroborated – could indicate that the UNRWA staff members may have been involved in the attacks of 7 October."³⁰ Why wasn't the evidence corroborated? As UN Deputy Spokesperson Farhan Haq noted on the day of the report's release, "OIOS was not able to independently authenticate most of the information provided to it that was in the hands of the Israeli authorities — that is, information that remains in the custody of Israel."³¹ Despite that, all nine individuals associated with these allegations were fired from UNRWA's nearly 30,000 workforce.

Also, UNRWA provides critical programs to millions of Palestinian refugees in the Occupied Palestinian Territory and Lebanon, Jordan, and Syria. In addition to food aid, UNRWA's programs include education and health services to nearly 6 million Palestinian refugees. During the unfolding

²⁹ *Civil Rights in Education: About the Civil Rights Data Collection*, DEPT. OF ED., <https://civilrightsdata.ed.gov/about/crdc> (last visited Oc. 10, 2024).

³⁰ *Investigation Completed: Allegations on UNRWA Staff Participation in the 7 October Attacks*, UNITED NATIONS OFF. OF THE UNRWA COMMISSIONER GEN., (Aug. 5, 2024) (<https://www.unrwa.org/newsroom/official-statements/investigation-completed-allegations-unrwa-staff-participation-7-october>)

³¹ *Daily Press Briefing by the Office of the Spokesperson for the Secretary-General*, UNITED NATIONS, (Aug. 5, 2024) <https://press.un.org/en/2024/db240805.doc.htm>.

genocide in Gaza, UNRWA is the single most effective relief agency, providing vital life-saving assistance. In this context, congressional action suspending UNRWA's funding was also a moral failure.

Further, perhaps the more central question is why hasn't the United States joined the 15 other member states in resuming support for UNRWA following the swift and decisive actions taken by UNRWA and the UN in response to allegations about staff?³² It is illogical to think these nations, including Australia, Austria, Canada, Germany, Italy, and the United Kingdom, have less of a commitment to the appropriate use of their taxpayer funds than the United States. Rather, their resumption of support reflects a recognition of the facts, not the global disinformation campaign to which UNRWA is being subjected.³³

The independent outside review of UNRWA neutrality processes, ordered by Secretary-General Guterres and led by former French Foreign Minister Catherine Colonna, confirmed that UNRWA had "established a significant number of mechanisms and procedures to ensure compliance with the humanitarian principles, with emphasis on the principle of neutrality and that it possesses a more developed approach to neutrality than other similar UN or NGO entities."³⁴

Among Colonna's observations was the fact that UNRWA shares its staff lists with host countries and that it is the host's responsibility to alert UNRWA to any information that may deem a staff member unsuitable for employment.³⁵ Colonna went on to say, "Of note, the Israeli Government has not informed UNRWA of any concerns relating to any UNRWA staff based on these staff lists since 2011."³⁶ The donor states that have resumed support to UNRWA understand that humanitarian agencies are not intelligence services and require the help of host countries to effectively address potential staffing issues.

The Colonna report also went on to make fifty recommendations to strengthen UNRWA's neutrality processes.³⁷ These 15 nations saw UNRWA management immediately endorse those recommendations and their implementation being overseen by an American, UNRWA Deputy Commissioner-General (Operations) Antonia De Meo.³⁸ Of course, some of these recommendations will require funding, something made more problematic by Congress' ill-advised actions.

³² *UK to Resume Funding to UN Gaza Aid Agency*, BBC (Jul. 19, 2024), <https://www.bbc.com/news/articles/cjm9r0w71g8o> ("The announcement brings the UK into line with other countries that have resumed funding since then, leaving the United States, UNRWA's single biggest donor, as the only country not to have restarted donations.").

³³ Paresch Dave, *Israel is Buying Google Ads to Discredit the UN's Top Gaza Aid Agency*, WIRED (Aug. 26, 2024), <https://www.wired.com/story/israel-unrwa-usa-hamas-google-search-ads/>.

³⁴ Final Report for the United Nations Secretary General: Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, 4-5 (April 20, 2024), <https://www.un.org/unispal/wp-content/uploads/2024/04/unrwa-independent-review-on-neutrality.pdf>.

³⁵ *Id.* at 21-22.

³⁶ *Id.* at 22.

³⁷ *Id.* at 36-43.

³⁸ *UNRWA Preliminary Response – Final Report of the Independent Review of Mechanisms and Procedures to Ensure Adherence By UNRWA to the Humanitarian Principle of Neutrality*, UNRWA (Apr. 20, 2024) <https://www.unrwa.org/resources/reports/unrwa-preliminary-response-final-report-independent-review-mechanisms-and>.

Providing an alternative and constructive path, some members of Congress have introduced H.R. 9649, the UNRWA Restoration Act. It takes a balanced approach to the issue, including requiring quarterly reports to Congress on the steps UNRWA is taking to implement the Colonna report recommendations.³⁹

Finally, justice cannot be limited to the nine individuals that are the focus of the question submitted for the record. 226 UNRWA employees have been killed in Gaza.⁴⁰ Policymakers should join UN Secretary General Guterres and UNRWA Commissioner General Lazzarini in their call for an investigation and accountability for the UN aid workers deaths.

³⁹ UNRWA Funding Emergency Restoration Act of 2024, H.R. 9649, 118th Congress (2023-2024) <https://www.congress.gov/bill/118th-congress/house-bill/9649>.

⁴⁰ Statement of Philippe Lazzarini, Commissioner-General of UNRWA, at the United Nations Security Council, UNRWA (Oct. 9, 2024), <https://www.unrwa.org/newsroom/official-statements/statement-philippe-lazzarini-commissioner-general-unrwa-united-nations-security-council>.