STATEMENT OF CASE TO DESIGNATE AL-AQSA MARTYRS' BRIGADES, AS A TERRORIST ENTITY

PURPOSE

- 1. The purpose of this paper is to set out the case demonstrating that Al-Aqsa Martyrs' Brigades ("AAMB"), meets the statutory criteria for designation as a terrorist entity within New Zealand pursuant to the Terrorism Suppression Act 2002 ("TSA").
- 2. The paper concludes that AAMB meets the criteria for designation as a terrorist entity under the TSA.

STRUCTURE OF THIS PAPER

- 3. This paper sets out background information about AAMB covering various aspects of the group's history, objectives, structure, tactics, weapons and involvement in terrorism, before detailing three case studies of attacks which meet the definition of a "terrorist act" under the TSA.
- 4. The discussion preceding the case studies provides background about AAMB, which helps inform the analysis of the case studies. The events detailed in the three case studies represent actual attacks attributed to, and claimed by, AAMB. It is these three events that have been analysed as meeting the definition of a "terrorist act" under s 5 of the TSA, and which provide the basis for the paper's conclusion that AAMB meets the legal criteria for designation as a "terrorist entity" under the TSA.

STATUTORY CRITERIA FOR THIS DESIGNATION UNDER THE TSA

- 5. The Prime Minister has the power under the TSA to designate individuals or groups as terrorist entities. Section 22 provides that the Prime Minister may designate an entity as a terrorist entity if the Prime Minister believes on reasonable grounds that the entity has knowingly carried out, or has knowingly participated in the carrying out of, one or more terrorist acts.
- 6. A "terrorist act" is defined in s 5 of the TSA. A number of different acts fall within this definition. The s 5 criteria relevant to this paper are those which deem an act to be a "terrorist act" if that act:
 - 6.1 Is intended to cause the death of, or serious bodily injury to, one or more persons;
 - 6.2 Is carried out for the purpose of advancing an ideological, political, or religious cause; and
 - 6.3 Is intended to either:
 - 6.3.1 Induce terror in a civilian population; or
 - 6.3.2 Unduly compel or force a government or an international organisation to do or abstain from doing any act; and
 - 6.4 Is not an act that occurs in a situation of armed conflict and is, at the time and in the place that it occurs, in accordance with rules of international law applicable to the conflict.

CREDIBILITY OF SOURCES

7. This paper has been prepared using open or unclassified sources which have a reputation for careful and unbiased reporting. These include: the Jane's series (World Insurgency & Terrorism, Terrorism & Security Monitor and Intelligence Review); Council on Foreign Relations; the Jamestown Foundation; The Centre for Strategic and International Studies; The New York Times; the BBC; The Washington Post; The Guardian; Reuters. This paper also utilises public information from the US Department of State and the Israeli Foreign Ministry, as well as a range of international organisations and think tanks, and international and regional media sources including the Jerusalem Post and Haaretz.

BACKGROUND

Establishment and History of the AAMB

- 8. The AAMB was established as a network of Palestinian militias during the second Palestinian uprising (*intifada*) in late 2000.¹ The group's name refers to the Al-Aqsa Mosque in Jerusalem (after which the Second or "Al-Aqsa" Intifada also takes its name), located atop the contested holy site known to Muslims as the Noble Sanctuary (Haram Al-Sahrif) and to Jews as the Temple Mount.²
- 9. The AAMB was established as a loose network of associated cells drawing recruits primarily from the Fatah party (the largest faction of the Palestinian Liberation Organisation which was led by Yasser Arafat until his death in 2004). As such, initial links between Fatah and the AAMB appeared strong, leading some to conclude that it was Fatah's armed wing. A BBC investigation in 2003 found that US\$50,000 a month was being sent to the AAMB by an associate of Arafat in the Palestinian Authority.³
- 10. But in recent years, especially since the death of Arafat, the links between Fatah and AAMB have waned, although the majority of its members adhere to Fatah political objectives.⁴ The current nature of the relationship between the AAMB and Fatah (to which the current Palestinian President Mahmoud Abbas belongs) remains unclear, in part due to the decentralised nature of the AAMB. In recent years the AAMB appears to have moved away from its traditional relationship with Fatah towards other sponsors, including the Lebanese group Hizbollah. Recent media reports indicate that Hizbollah has filled the void in terms of providing material support to AAMB.⁵
- 11. AAMB was initially focussed on small arms attacks against Israeli military personnel and settlers in the West Bank. In 2002, however, the group began to take part in suicide bombing against Israeli civilians, either by itself, or in collaboration with other groups, for example the Palestinian Islamic Jihad. Between 2002 and 2008 the AAMB claimed responsibility for some of the most significant attacks against Israel including: a pair of January 2003 suicide bombings in Tel Aviv which killed 23 people and injured over 100, a January 2004 attack on a bus in Jerusalem that killed 11 people, and a March 2002 suicide attack at a Jerusalem café that killed 11 and wounded more than 50.⁶
- 12. Since 2008 AAMB has primarily carried out shootings in the West Bank and rocket and mortar attacks into southern Israel from Gaza.⁷

13. The AAMB was designated as a terrorist entity by the United States in March 2002, by the European Union in June 2002, and by Canada in April 2003 (renewed in November 2008).

Ideology and objectives

- 14. The AAMB is a secular nationalist Palestinian group. While linked to the Fatah party, AAMB represents the violent fringe which rejects negotiations with Israel and seeks the establishment of a Palestinian state through violent means. The AAMB rejects making concessions to Israel, and seeks an unconditional Israeli withdrawal from the West Bank (and Gaza) to pre-1967 borders, and the right of return for Palestinian refugees to their former homes in Israel.⁸ The AAMB believes that the use of violence is a legitimate tactic for achieving this objective and in numerous public statements has declared that it believes that "liberation cannot be realised except through armed resistance."⁹ The AAMB has also issued statements declaring that "resistance and martyrdom operations... [are their] only option."¹⁰
- 15. While the AAMB is a secular group with a Palestinian nationalist agenda, and does not seek the creation of an Islamic state in the same manner as Hamas, some members do, however, share the ideological view of more extreme Islamists, and oppose the existence of Israel.¹¹ The AAMB also views those who are involved in suicide attacks as being "martyrs", and works in collaboration with other violent Islamist groups, namely Hizbollah, Hamas' Izz al-Din al-Qassam Brigades and Palestinian Islamic Jihad.¹²
- 16. AAMB has a clearly articulated intent to force Israel to withdraw from the West Bank and Gaza through violent attacks against Israelis and Israeli interests. This is reflected in the following comment from an AAMB spokesperson: "We exist to fight the occupation. When the occupation ends we will dissolve."¹³

Organisation and structure

- 17. The AAMB consists of a number of small loosely-affiliated cells in the West Bank and Gaza Strip split amongst the various cities and towns, which, to a large extent, act autonomously.¹⁴ These cells often adopt the names of Palestinian fighters (often those killed in action against Israel) when forming cells to undertake attacks. For example, a group calling itself the "Al-Aqsa Martyrs Brigade – Imad Mugniyeh Group" (taking its name from the high-profile senior member of Hizbollah who was killed in early 2008), has claimed responsibility for numerous attacks in the West Bank in the past two years.¹⁵
- 18. Although AAMB members adhere to Fatah's political agenda and are usually members of its party, the degree of control that Fatah exerts over the organisation is not clear.¹⁶ There is no clearly defined hierarchy within AAMB. In part, this decentralised structure represents a deliberate decision to make it harder for Israel to disrupt the groups' activities.¹⁷
- 19. Due to the autonomous nature of the AAMB cells, AAMB members often take part in joint attacks with other Palestinian rejectionist groups, including the Izz al-Din al-Qassam Brigades of Hamas and the Palestinian Islamic Jihad, leading to multiple groups claiming responsibility for the same attack.

Weapons and Tactics

- 20. AAMB has access to, and has used, a wide range of weaponry in its attacks, including small arms and assault rifles, explosives (used both in suicide attacks and in the construction of crude roadside bombs) and home-made rockets.¹⁸
- 21. AAMB initially engaged primarily in shootings against Israeli soldiers and settlers in the West Bank, but in 2002 (following the targeted killing of one of its leaders by Israel) changed its focus to carrying out suicide attacks against Israeli civilians, including within Israel.¹⁹ Since late 2007, the AAMB has primarily reverted to shooting attacks against Israeli targets in the West Bank, and launching rockets from the Gaza Strip into Israel.²⁰
- 22. Attacks claimed by AAMB have often been in retaliation for Israeli actions. The Imad Mughniyeh Group of the AAMB, for example, claimed responsibility for an attack against Israeli settlers in June 2010, stating that it was a response to an attack on a Palestinian teenager near Ramallah, allegedly by Israeli settlers.²¹ The settlers received only minor injuries in the attack.²² The same group also claimed responsibility for shooting dead two Police officers, David Rabinowitz and Yehezkel Ramzarkar, in the West Bank in March 2009.²³

CASE STUDIES

1. The shooting of an Israeli civilian, West Bank, November 19 2007

The facts

- 23. On the evening of 19 November an Israeli civilian, Ido Zoldan, was shot in a small arms/assault rifle attack near the settlement of Kedumim in the northern West Bank. Zoldan was injured in the neck and chest, and later died of his wounds, after the car he was driving was shot at nine times.²⁴
- 24. The attack was claimed by the AAMB as "an act of protest against the Annapolis Conference", which was about to be held in the United States, and "a response to Israel's crimes against the Palestinians".²⁵ The attack was widely attributed to the AAMB, and not claimed by any other groups.²⁶

The act meets the TSA criteria for designation

- 25. The shooting attack on the Israeli civilian in his car on 9 November 2007 is consistent with the definition of a terrorist act under s 5 of the TSA.
- 26. The nature of this targeted shooting attack and the kinds of weapons used by the attackers clearly shows an intention to cause the death of, or serious bodily injury to, the Israeli civilian in his car (s 5(3)(a) TSA).
- 27. The shooting is part of a strategy by AAMB, which was recently revived, of attacks on civilian Israeli targets in the West Bank (see paragraph 21 above). Such attacks, and the use of extreme violence in carrying them out, demonstrate an intention to induce terror in the civilian population (s 5(2)(a) TSA). Further, the AAMB expressed its political motivations for carrying out this attack, which included its opposition to a forthcoming Middle East Peace Conference. This attack is thus also an example of AAMB's pursuit, through its preferred strategy of violence, of its objective to force Israel to withdraw from the West Bank and to bring about the establishment of a Palestinian state (s 5(2)(b) TSA). This shooting attack was therefore also carried out

with the purpose of advancing the AAMB's own ideological/political cause (s 5(2) TSA).

2. The shooting of an Israeli civilian, West Bank, 24 December 2009

The facts

- 28. On the evening of 24 December 2009, Meir Avshalom Chai, an Israeli civilian, was killed when AAMB militants opened fire on his car using small arms as he drove near his home in the West Bank settlement of Shavei Shomron.²⁷ One of the affiliated cells of AAMB, calling itself the Imad Mughniyeh Group of the AAMB, claimed responsibility for the attack.²⁸ In an email statement, the group warned of "a series of attacks to come."²⁹ The attack was widely attributed in the media to AAMB, and no other groups claimed responsibility.³⁰
- 29. Three days after the shooting the Israeli military launched a raid on a Palestinian home in Nablus, killing three men. According to Palestinian sources two of the men were AAMB militants and, according to the Israeli military, a ballistic analysis of weapons found in the house showed that they had been used in the attack that killed Meir Chai.³¹

The act meets the TSA criteria for designation

- 30. The shooting attack on the Israeli civilian in his car on 24 December 2009 is consistent with the definition of a terrorist act under s 5 of the TSA.
- 31. The nature of this targeted shooting attack and the kinds of weapons used by the attackers clearly shows an intention to cause the death of, or serious bodily injury to, the Israeli civilian in his car (s 5(3)(a) TSA).
- 32. The shooting is part of a strategy by AAMB, which was recently revived, of attacks on civilian Israeli targets in the West Bank (see paragraph 21 above). AAMB also warned of further attacks to come. Such attacks, coupled with the use of extreme violence in carrying them out and the threat of future attacks, demonstrate an intention to induce terror in the civilian population (s 5(2)(a) TSA). This attack is also an example of AAMB's pursuit, through violent means, of its objective to force Israel to withdraw from the West Bank and to bring about the establishment of a Palestinian state (s 5(2)(b) TSA). This shooting attack was therefore also carried out with the purpose of advancing the AAMB's own ideological/political cause (s 5(2) TSA).

3. The shooting of an Israeli Police Officer, Hebron, West Bank, 14 June 2010

The facts

- 33. At around 7.20am on 14 June 2010, one Israeli Police officer, Yehushua Sofer, was killed and two others were seriously wounded when the police vehicle they were travelling in came under attack from small arms fire. The attack happened on route 60 north of the city of Hebron, and around nine kilometres from the Dahariya checkpoint, which had been dismantled by Israeli authorities three weeks earlier. The officers were being transported from Beersheba to Jerusalem.³² Investigators suggested the shooting was a planned ambush attack.³³
- 34. The affiliated cell calling itself the "Al-Aqsa Martyrs' Brigades Imad Mughniyeh Group" claimed responsibility for the attack stating it was in response to Israel's

deadly raid on the 'aid flotilla' bound for Gaza on 31 May. The attack was widely attributed in the media to AAMB, and no other groups claimed responsibility.³⁴

The act meets the TSA criteria for designation

- 35. The shooting attack on the Israeli police officers is consistent with the definition of a terrorist act under s 5 of the TSA.
- 36. The nature of this targeted shooting attack and the kinds of weapons used by the attackers clearly shows an intention to cause the death of, or serious bodily injury to, the Israeli civilian police officers in their car (s 5(3)(a) TSA).
- 37. The shooting is part of a strategy by AAMB, which was recently revived, of attacks on civilian Israeli targets in the West Bank (see paragraph 21 above). Such attacks, and the use of extreme violence in carrying them out, demonstrate an intention to induce terror in the civilian population (s 5(2)(a) TSA). The attack is consistent with AAMB's custom of carrying out attacks in retaliation for Israeli actions (see paragraph 22 above). This attack is also an example of AAMB's pursuit, through violent means, of its objective to force Israel to withdraw from the West Bank and to bring about the establishment of a Palestinian state (s 5(2)(b) TSA). This shooting attack was therefore also carried out with the purpose of advancing the AAMB's own ideological/political cause (s 5(2) TSA).

LAW OF ARMED CONFLICT

Is there an armed conflict and are AAMB members combatants?

- 38. For the s 5(4) exemption to apply, two conditions must be satisfied. First that at the time the attacks detailed in the case studies were carried out, a state of armed conflict existed in the areas in which the AAMB conducts its operations; and second, that the attacks carried out complied with the law of armed conflict ("LOAC"). If one of these conditions is not met, the exemption does not apply.
- 39. The first question that arises under this definition is whether there exists within Palestine/Israel a state of "armed conflict" for the purposes of international law.
- 40. Although the level of violence arising from the three most recent periods of Intifada (uprising) has generally been relatively sustained and often intense, many experts consider that it has not consistently held the characteristics needed to be an armed conflict for the purposes of international law. The activities of AAMB, however, have generally been at the lower level of organisational violence.
- 41. Israel has conceded that customary international law applicable to armed conflict, and certain parts of the Geneva Conventions of 1949, apply to the conflict. For the purposes of this analysis, it is accepted that some form of armed conflict has occurred in Israel / Palestine, although its characteristics do not fit in well with many of the basic criteria of the established treaty law.
- 42. In addition to open hostilities, however, LOAC also applies during a state of armed occupation, even if that occupation meets no armed resistance. The International Court of Justice decided in its advisory opinion on the legal consequences of the construction of a wall in the Occupied Palestinian Territory that the land seized by Israeli forces during the 6-Day War is occupied territory, and that Israel is therefore an occupying power for the purposes of the Hague Convention of 1907, the Fourth

Geneva Convention, and for the purposes of Customary International Law. Whether or not the situation in the occupied territories is, therefore, an armed conflict per se, LOAC applies to the actions of the occupying power and the activities of those who resist the occupation.

- 43. It should be noted that, although Additional Protocol I extends the definition of international armed conflict to include situations where peoples are fighting for self-determination against alien occupation and racist regimes, Israel is not a party to this Protocol. Israel is also not a party to Additional Protocol II which applies to non-international armed conflict. The Palestine Liberation Organisation, on behalf of the Palestinian people, has stated its intention to be bound by the Geneva Conventions of 1949 and the two Additional Protocols of 1977 but cannot be a party to any of these treaties due to its lack of State personality.
- 44. From the information available on open sources documentation it does not appear that AAMB complies with the definition of combatant. Although aspects of AAMB are organised along military lines, are disciplined, and its members are commonly depicted in the media wearing camouflaged fatigues and brandishing weapons they do not so distinguish themselves when launching their attacks. The question of compliance with LOAC in respect of AAMB means and methods of combat is dealt with further below. Occasional breaches of LOAC could not be used to disqualify an otherwise qualifying force, but there must at least be evidence of a chain of command that enforces respect for LOAC. There is no evidence that any such programme exists within AAMB.

Were the acts carried out in accordance with the applicable rules of LOAC?

45. Having failed to meet the threshold of a combatant in an armed conflict, it is not necessary to go further to examine whether the action of AAMB would have been in accordance with that law. However, for completeness, clearly all three attacks described in the case studies were directed against civilians and would have breached the principle of distinction – that attacks on enemy combatants and military objectives are lawful, whereas attacks on the civilian population or civilian objects are not.

¹ Holly Fletcher, 2008. Al-Aqsa Martyrs Brigade, Backgrounder, Council on Foreign Relations, 2 April 2008

² Holly Fletcher, 2008. Al-Aqsa Martyrs Brigade, Backgrounder, Council on Foreign Relations, 2 April 2008

³ 'Palestinian Authority funds go to militants' BBC News, 7 November 2003 <u>http://news.bbc.co.uk</u> last accessed 30 September 2010

⁴ i. 'Al-Aqsa Martyrs Brigades', Transnational and Non-State Armed Groups – Legal and Policy Responses, <u>http://www.armed-groups.org</u> last accessed 28 September 2010.

ii. Holly Fletcher, 2008. *Al-Aqsa Martyrs Brigade*, Backgrounder, Council on Foreign Relations, 2 April 2008 ⁵ i. Hizballah supports wide network of cells of Al-Aqsa Brigades' in Al-Hayah, 22 July 2006.

ii. 'Hezbollah cell recruited members in the name of Al-Aqsa Martyrs Brigade', Asharq Al-Awsat (English Edition), 20 April 2009, <u>http://www.aawsat.com/english</u> last accessed 28 September 2010

⁶ Holly Fletcher, 2008. Al-Aqsa Martyrs Brigade, Backgrounder, Council on Foreign Relations, 2 April 2008

⁷ 'Fatah', Jane's World Insurgency and Terrorism, 30 June 2010.

⁸ i. Anthony Cordesman, 2006. *Palestinian Forces: Palestinian Authority and Militant Forces*, Centre for Strategic and International Studies, Washington, 2006.

ii. 'Al-Aqsa Martyrs Brigades', Transnational and Non-State Armed Groups – Legal and Policy Responses, <u>http://www.armed-groups.org</u> last accessed 28 September 2010.

iii. Audrey Cronin, 2004. 'Foreign Terrorist Organisations' Congressional Research Service report for Congress, February 2004.

⁹ i. Anthony Cordesman, 2006. *Palestinian Forces: Palestinian Authority and Militant Forces*, Centre for Strategic and International Studies, Washington, 2006.

ii. interview with Abu-Uday, spokesperson for Al-Aqsa Martyrs Brigades in the West Bank, published by the Ma'an News Agency, Bethlehem 2004.

¹⁰ statement issued by the Al-Aqsa Martyrs Brigades via the official website of the Al-Aqsa Martyrs Brigades <u>http://katebaqsa.org</u> October 2006

¹¹ 'Al-Aqsa Martyrs Brigades', Transnational and Non-State Armed Groups – Legal and Policy Responses, <u>http://www.armed-groups.org</u> last accessed 28 September 2010.

¹² i. Holly Fletcher, 2008. Al-Aqsa Martyrs Brigade, Backgrounder, Council on Foreign Relations, 2 April 2008

ii. 'Fatah', Jane's World Insurgency and Terrorism, 30 June 2010.

¹³ i. Interview with Rabi Hamad, spokesperson for Al-Aqsa Martyrs Brigades, published in the *Palestine Times* 11 December 2006.

ii. 'Al-Aqsa Martyrs Brigades', Transnational and Non-State Armed Groups – Legal and Policy Responses, <u>http://www.armed-groups.org</u> last accessed 28 September 2010.

¹⁴ i.'Al-Aqsa Martyrs Brigades', Transnational and Non-State Armed Groups – Legal and Policy Responses, <u>http://www.armed-groups.org</u> last accessed 28 September 2010.

ii. 'Fatah', Jane's World Insurgency and Terrorism, 30 June 2010.

¹⁵ "Shin Bet: We've caught Hamas cell behind the murder of Israeli policeman' Haaretz, 19 July 2010, <u>http://www.haaretz.com</u>, last accessed 28 September 2010.

¹⁶ i. Palestinian Authority funds go to militants', BBC News, 7 November 2003. <u>http://news.bbc.co.uk</u> last accessed 30 September 2010

ii. Kim Cragin, Peter Chalk, Sara Daly, Brian Jackson, 2007. Sharing the Dragon's Teeth: Terrorist Groups and the Exchange of New Technologies (Santa Monica: Rand Corporation, 2007)

¹⁷ Interview with Rabi Hamad, spokesperson for Al-Aqsa Martyrs Brigades, published in the *Palestine Times* 11 December 2006.

¹⁸ i. 'Fatah', Jane's World Insurgency and Terrorism, 30 June 2010.

ii. Holly Fletcher, 2008. Al-Aqsa Martyrs Brigade, Backgrounder, Council on Foreign Relations, 2 April 2008

¹⁹ i. Holly Fletcher, 2008. Al-Aqsa Martyrs Brigade, Backgrounder, Council on Foreign Relations, 2 April 2008

²⁰ i. 'Fatah', Jane's World Insurgency and Terrorism, 30 June 2010.

²¹ 'Report: Al-Aqsa Martyrs Brigades claim responsibility for West Bank shooting attack', Haaretz, 14 May 2010, http://www.haaretz.com, last accessed 22 September 2010

²² Police officer killed and two wounded in West Bank shooting', Haaretz, 14 June 2010, <u>http://www.haaretz.com</u>, last accessed 22 September 2010.

'Report: Al-Aqsa Martyrs Brigades claim responsibility for West Bank shooting attack', Haaretz, 14 May 2010, <u>http://www.haaretz.com</u>, last accessed 22 September 2010.

²³ 'Israel Police killed in West Bank', Al Jazeera, 15 March 2009, <u>http://english.aljazeera.net</u>, last accessed 24 September 2010.

²⁴ 'IDF: PA police killed settler Ido Zoldan in West Bank last week', Haaretz 2 December 2007, http://www.haaretz.com, last accessed 4 October 2010.

²⁵ i. 'IDF: PA police killed settler Ido Zoldan in West Bank last week', Haaretz 2 December 2007, <u>http://www.haaretz.com</u>, last accessed 4 October 2010.

ii. Israeli killed by terrorists in the W. Bank' Jerusalem Post, 19 November 2007, http://www.jpost.com , last accessed 4 October 2010

iii. 'Settler's murderer gets life sentence' YNet News 1 February 2010 <u>http://www.ynetnews.com</u>, last accessed 4 October 2010

²⁶ i. 'Iran, Syria said to be stepping up support of terrorist groups', Jerusalem Post, 21 November 2007

ii. "IDF: PA police killed settler Ido Zoldan in West Bank last week', Haartez, 2 December 2007

iii. "Israeli killed in West Bank terror attack' YNet News, 20 November 2007

²⁷ 'Israeli forces kill 6 Palestinians in West Bank and Gaza', LA Times, 27 December 2009, <u>http://www.latimes.com</u>, last accessed 22 September 2010.

²⁸ i. 'Six Palestinians killed in West Bank, Gaza attacks', BBC News, 26 December 2009, <u>http://www.bbc.co.uk</u>, last accessed 22 September 2010.

ii. 'Settler violence after shooting death', Ma'an News Agency, 24 December 2009, <u>http://www.maannews.net</u> last accessed 4 October 2010.

²⁹ 'Settler violence after shooting death', Ma'an News Agency, 24 December 2009, <u>http://www.maannews.net</u> last accessed 4 October 2010.

³⁰ i. 'Fatah', Jane's World Insurgency and Terrorism, 30 June 2010.

ii. 'Rifle found in Nablus hideout belonged to terrorists who murdered Chai', Jerusalem Post, 28 December 2009

iii. 'Settler violence after shooting death', Ma'an News Agency, 24 December 2009, <u>http://www.maannews.net</u> last accessed 4 October 2010

³¹ i. Palestinians vow raid retaliation', Al Jazeera, 27 December 2009, <u>http://english.aljazeera.net</u>, last accessed 22 September 2010.

ii. 'Terrorists Responsible for murder killed in joint IDF-ISA operation' – website of the Israeli Ministry of Foreign Affairs <u>www.mfa.gov.il</u> accessed 28 September 2010.

iii. 'Six Palestinians killed in West Bank, Gaza attacks', BBC News, 26 December 2009, <u>http://www.bbc.co.uk</u>, last accessed 22 September 2010.

iv. 'Israeli forces kill 6 Palestinians in West Bank and Gaza', LA Times, 27 December 2009, <u>http://www.latimes.com</u>, last accessed 22 September 2010.

³² i'Israeli Policement killed in ambush', Al Jazeera, 14 June 2010, <u>http://english.aljazeera.net</u>, last accessed 22 September 2010.

ii. 'Police officer killed and two wounded in West Bank shooting', Haaretz, 14 June 2010, <u>http://www.haaretz.com</u>, last accessed 22 September 2010.

iii. 'Al-Aqsa Brigade claims attack', Jerusalem Post, 14 June 2010, <u>http://www.jpost.com</u> last accessed 28 September 2010.

³³ 'Police officer killed and two wounded in West Bank shooting', Haaretz, 14 June 2010, <u>http://www.haaretz.com</u>, last accessed 22 September 2010.

³⁴ i. 'Israeli Policeman Killed in Ambush', Al-Jazeera, 14 June 2010, <u>http://english.aljazeera.net</u> last accessed 28 September 2010.

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