



AL-MEZAN CENTER FOR HUMAN RIGHTS
مركز الميزان لحقوق الإنسان

lawyers for palestinian
human rights



RE: Complaint concerning destruction and damage to family houses in the Gaza Strip, with associated loss of life and injury to Palestinian residents, during Israel's military operation between 7 July 2014 and 26 August 2014, submitted to the:

- **United Nations Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context; and**
- **United Nations Special Rapporteur on the Palestinian territories occupied since 1967.**

1. Al Mezan Center for Human Rights (Al Mezan) and Lawyers for Palestinian Human Rights (LPHR) submit this joint complaint to the United Nations Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context (United Nations Special Rapporteur on Adequate Housing) and to the United Nations Special Rapporteur on the Palestinian territories occupied since 1967 (United Nations Special Rapporteur on the OPT), concerning the large-scale destruction and extensive damage to family houses in the Gaza Strip, with associated loss of life and injury to Palestinian residents, resulting from Israel's military attacks during their military operation codenamed 'Operation Protective Edge' between 7 July 2014 and 26 August 2014.
2. As of 27 August 2014, it is estimated by the United Nations that the cumulative number of housing units destroyed or severely damaged (including those directly targeted or affected as collateral damage) in Gaza since the start of Israel's military operation is over 18,000.¹ The number of housing units that sustained minor or major damage, but are still inhabitable, is estimated at 37,650.²

¹ Occupied Palestinian Territory: Gaza Emergency Situation Report (as of 27 August 2014, 0800 hours); United Nations Office for the Coordination of Humanitarian Affairs;
http://www.ochaopt.org/documents/ocha_opt_sitrep_27_08_2014.pdf

² Occupied Palestinian Territory: Gaza Emergency Situation Report (as of 20 August 2014, 0800 hours); United Nations Office for the Coordination of Humanitarian Affairs;
http://www.ochaopt.org/documents/ocha_opt_sitrep_20_08_2014.pdf

3. The human rights and humanitarian consequences of Israel's military targeting of family homes has been devastating for the residents of Gaza.
4. As of 25 August 2014, the United Nations verified at least 142 families had lost three or more family members in the same incident, for a total of 739 fatalities.³ These victims include members of the most vulnerable groups of society: children, elderly people, and pregnant women.
5. As of 27 August 2014, Al Mezan's documentation unit reports that at least 999 family members had been killed inside their houses⁴. This includes 329 children and 212 women. Two women with severe and complex impairments were killed in an attack on a residential centre for people with disabilities. An additional 233 people were killed in the vicinity of their houses. This includes situations where people were trying to flee from their family homes as a result of Israeli military attacks.
6. In total, over 58 per cent of the 2,116⁵ confirmed Palestinian fatalities during Israeli's military operation in Gaza between 7 July 2014 and 26 August 2014 were caused as a direct consequence of Israel's large-scale, deliberate and systematic military attacks against family homes.
7. The corroborated evidence of the alarming and grave consequences of the Israeli military targeting of family homes led the then serving United Nations High Commissioner for Human Rights, Navi Pillay, to express: 'what we are witnessing is the killing of whole families'⁶.
8. Three days before the ceasefire agreement on 26 August 2014, the Israeli military commenced deliberate attacks against a number of multi-storey buildings, including the destruction of three high rise buildings which housed multiple families. These distinct military attacks did not lead to loss of life, but did cause a number of injuries and 'significantly increased the number of displaced families'⁷.
9. As of 26 August 2014, the total number of Internally Displaced Persons in shelters and with host families after fleeing from their family homes was estimated by the United Nations to be 475,000, or more than a quarter of Gaza's population.⁸

³ Occupied Palestinian Territory: Gaza Emergency Situation Report (as of 26 August 2014, 0800 hours); United Nations Office for the Coordination of Humanitarian Affairs; http://www.ochaopt.org/documents/ocha_opt_sitrep_26_08_2014.pdf

⁴ Al Mezan press release, 27 August 2014; http://www.mezan.org/en/details.php?id=19514&ddname=IOF&id_dept=9&id2=9&p=center

⁵ Occupied Palestinian Territory: Gaza Emergency Humanitarian Snapshot (as of 29 August 2014, 0800 hours); United Nations Office for the Coordination of Humanitarian Affairs; http://www.ochaopt.org/documents/humanitarian_Snapshot_31_august_2014_oPt_V4.pdf

⁶ On 31 July 2014 as reported in the Occupied Palestinian Territory: Gaza Emergency Situation Report (as of 31 July 2014, 1500 hours); United Nations Office for the Coordination of Humanitarian Affairs; http://www.ochaopt.org/documents/ocha_opt_sitrep_01_08_2014.pdf

⁷ Occupied Palestinian Territory: Gaza Emergency Situation Report (as of 26 August 2014, 0800 hours); United Nations Office for the Coordination of Humanitarian Affairs; http://www.ochaopt.org/documents/ocha_opt_sitrep_26_08_2014.pdf

⁸ Ibid.

- 10.** The United Nations estimates that alternative housing will be needed for the approximately 108,000 residents of Gaza whose family homes have been destroyed or severely damaged.⁹ This emergency situation has been described by a United Nations Relief and Works Agency spokesperson as a 'man-made homelessness crisis on an epic scale'.¹⁰ The United Nations Special Coordinator for the Middle East Peace Process, Robert Serry, has stated that 'reconstruction is the main priority'.¹¹ The World Health Organisation has reported that injured persons whose families have been displaced are at particular health risk from medical complications following hospital discharge.¹²
- 11.** Al Mezan and LPHR assert that the vast destruction and damage caused to family houses amounts to a gross, deliberate and systematic violation of the right to adequate housing. Al Mezan's monitoring of the large-scale, deliberate and systematic targeting of family homes further raises the extremely serious concern that international humanitarian law has been seriously violated with grave consequences for respect for the right to life and physical integrity. These actions may amount to war crimes and crimes against humanity.
- 12.** This complaint presents significant initial evidence of forty serious violation incidents of the right to adequate housing and the right to life and physical integrity during Israel's military operation in Gaza between 7 July 2014 and 26 August 2014. The information presented on these horrifying and significant violation incidents is based primarily on investigations by Al Mezan's documentation unit.
- 13.** Al Mezan and LPHR emphasises there were many other serious violation incidents involving the right to adequate housing and the right to life and physical integrity during Israel's military operation in Gaza between 7 July 2014 and 26 August 2014 that could have been selected for specific focus in this complaint. We however decided to limit the complaint to highlighting just forty of the profoundly large number of serious violation incidents. We take the position that each violation incident is equally significant and therefore any omission of a violation incident in this complaint should not be interpreted as Al Mezan and LPHR diminishing its gravity and seriousness relative to the violation incidents documented in this complaint.
- 14.** Al Mezan and LPHR request the United Nations Special Rapporteur on Adequate Housing and the United Nations Special Rapporteur on the OPT use this complaint as the basis for their own urgent investigation into the large-scale, deliberate and systematic targeting of family homes in Gaza by Israel's military forces, and take appropriate action pursuant to our suggested recommendations. We specifically request this includes liaising with the recently appointed United Nations Human Rights Council independent

⁹ Occupied Palestinian Territory: Gaza Emergency Situation Report (as of 27 August 2014, 0800 hours); United Nations Office for the Coordination of Humanitarian Affairs;

http://www.ochaopt.org/documents/ocha_opt_sitrep_27_08_2014.pdf

¹⁰ Chris Gunness statement to AFP on 9 August 2014; <http://www.thedailystar.net/gaza-blockade-must-end-un-36505>

¹¹ On 18 August 2014 as reported in the Occupied Palestinian Territory: Gaza Emergency Situation Report (as of 19 August 2014, 0800 hours); United Nations Office for the Coordination of Humanitarian Affairs;

http://www.ochaopt.org/documents/ocha_opt_sitrep_19_08_2014.pdf

¹² Situation Report #10 23-28 August 2014; Occupied Palestinian Territory; World Health Organisation; http://www.emro.who.int/images/stories/palestine/documents/WHO_Sitrep_on_Gaza_-_10.pdf

Commission of Inquiry concerning the significant legal and human rights issues raised by Israel's military attacks against family houses in Gaza during their military operation between 7 July 2014 and 26 August 2014.

15. Al Mezan is a Palestinian non-governmental human rights organization that works for the protection and promotion of Palestinian human rights in Gaza as part of occupied Palestine.
16. LPHR is a lawyer-based legal charity in the United Kingdom that works on projects aimed at protecting and promoting Palestinian human rights.

Forty serious violation incidents of the right to adequate housing and the right to life and physical integrity during Israel's military operation in Gaza between 7 July 2014 and 26 August 2014:

The Kaware family home attacked at 14:55 on 8 July 2014:

17. An Israeli drone fired a 'warning missile' or 'roof knock' (the dropping of non-impact or low-impact explosives on the intended target) at the house of Odeh Kawari' in the city of Khan Younis, south of the Gaza Strip. The residents of the three-storey home, which is occupied by five families, left the house. However, dozens of their neighbours gathered in front of the house and many went up to its roof expecting that the Israeli military would refrain from attacking the house with such a heavy and visible presence of civilians. About ten minutes after the 'warning missile' an Israeli military aircraft struck the house with heavy missiles. The house was completely destroyed, killing seven people including six children. Another 28 people were injured. The seven fatalities have been identified as:

- Ammar Judeh, 18;
- Hussein Kawari', 13;
- Mohammed Ibrahim Kawari', 50;
- Basim Kawari', 10;
- Mohammed Ali Kawari', 12;
- Abdallah Kawaei', 6;
- Qasim Odeh, 12; and
- Seraj Abdul Aal, 8.

The Al Haj family home attacked at 01:20 on 10 July 2014:

18. An Israeli military aircraft fired one missile without warning at the house of Mahmoud Al Haj, 57, which is located in Block 'J' in Khan Younis refugee camp. The house consists of one floor and is about 100 square metres in area. As a result, the house was totally destroyed while its residents were inside. Eight members of the Al Haj family were killed, including two children. Several adjacent houses sustained severe damage in this

attack and 23 people were injured due to the scattering rubble. The eight fatalities have been identified as:

- Mahmoud Al Haj, 57;
- Basma Al Haj, 48; (his wife); and their sons and daughters:
- Omar Al Haj, 20;
- Sa'ad Al Haj, 17;
- Tareq Al Haj, 18;
- Asmaa Al Haj; 22;
- Najlaa' Al Haj, 29; and
- Fatma Al Haj, 12.

Four days after the lethal attack on the Al Haj family house in Khan Younis, Al Mezan interviewed Yasser Al Haj, 25, the sole resident survivor of this attack: 'I was about 200 metres from my house when, around 1:20am, I heard a huge explosion and saw thick smoke coming from our house's narrow alleyway. I entered the alley but the smoke was so thick that I could not see clearly. I thought the Israeli military had bombarded our neighbour's house. I walked forward and was shocked to see it was our home that appeared to be totally destroyed. I felt I was losing control and did not know what to do'.

Yasser saw neighbours joined by his uncle carrying the bodies of his family. 'I saw my uncle carrying the body of my mother and I ran hysterically after him.' Neighbours, noticing Yasser was in shock, stopped him and drove him to the hospital. 'It was maybe easier to find my family members at the [Nasser] hospital's morgue and, hopefully, wards of the hospital,' he added.

Yasser found dead bodies of brothers and sisters and was given a shot to calm him by a doctor. He heard all of the details upon waking up. 'Now, it is only me and my sister, Fedaa', who is married and was in her house when the attack occurred. I do not understand why they attacked us, not even a warning was given to us'.

The Mebarat Palestine Centre for people with disabilities attacked at 04:40 on 12 July 2014:

19. An Israeli military aircraft fired a missile which destroyed the Mebarat Palestine Centre for people with intellectual impairments in Beit Lahiya in the North Gaza district. This residential care centre was run by a non-governmental organisation (NGO) that supports people with severe and complex impairments. As a result of this attack, two women with disabilities were killed:

- Soha Abu Sa'da, 38; and
- Ola Wishahi, 31.

Another two women with disabilities, a man with disabilities, and a female care support worker were critically injured from shrapnel and burns. The four were admitted to the burns unit of Shifa hospital and have been identified as:

- Ahmad Al A'war, 26; (disabled)

- Mai Hamada, 31; (disabled)
- Sali Saqer, 19; (disabled) and
- Salwa Abu Al Qomsan; (care support worker).

The two-storey building is owned by Alaa' Al 'Aklouk, and its second floor is not rented.

Al Mezan spoke with Mrs. Jamila 'Iliwa, the president of the NGO, who said their organisation provides various services for people with severe impairments, including shelter. She stated that there were nineteen people with disabilities staying in it when the Israeli military operation started. However, fourteen of them left it for the Friday weekend holiday. She added that the NGO continued to provide its services despite several attacks on an empty field not far from it prior to the attack. She said that a few minutes before the attack she was informed that the Israeli military fired a missile at the area, but she believed it was another attack on the area. 'No one expected a direct attack on the building; nothing in or around the building would justify such an attack on us'.

The Al Batsh family home attacked at 22:30 on 12 July 2014:

20. An Israeli military aircraft fired two missiles without prior warning at the house of Majid Subhi Al Batsh, 50, in the At-Tuffah neighbourhood east of Gaza City. The attack destroyed the house completely, along with two adjacent houses that belong to Majid's three brothers, No'man, Alaa' and Issam. Eighteen members of the Al Batsh family were killed in this attack, including six children and three women. Another sixteen were injured, including three women and three children. Four of the injured were in critical condition. The eighteen fatalities have been identified as:

- Majid Subhi Al Batsh, 50;
- Khalid Majid Al Batsh, 20; (Majid's son)
- Manar Majid Al Batsh, 13; (Majid's son)
- Ibrahim Majid Al Batsh, 18; (Majid's son)
- Jalal Subhi Al Batsh, 26;
- Mahmoud Majid Al Batsh, 20; ; (Majid's son)
- Marwa Majid Al Batsh, 7; (Majid's daughter)
- Baha' Majid Al Batsh, 28; ; (Majid's son)
- Amal Hassan Al Batsh, 49; ; (Majid's wife)
- Samah Alaa' Al Batsh, 20; (Baha's pregnant wife)
- Amal Alaa' Al Batsh, 1.5; (Samah's daughter);
- Nahidh Na'eem Al Batsh, 41, (visiting his cousins)
- Aziza Yousef Al Batsh, 59; (next door neighbour)
- Qusai Issam Al Batsh, 12; (next door neighbour)
- Mohammed Issam Al Batsh, 17; (next door neighbour)
- Yahya Alaa' Al Batsh, 18; (Samah's brother) and
- Anas Alaa' Al Batsh, 7, (Samah's brother)

On 28 July 2014, Zakaria Alaa' Sobhi Al Batsh, 20, died from wounds that he sustained in the attack on 12 July.

According to a testimony given to Al Mezan by Ahmad Nu'man Al Batsh, 26, who was injured in the attack and who lives next to his uncle Majid's house, he and his family were in their house watching the news at 10pm. His cousin, Tayseer, came to visit. Ahmad said, 'my cousins always gather in one of our three homes when the electricity is on... we were 17 in our house; men, women and children'. Ahmed suggested that they pray the 'Isha prayer together, which they did. 'Just after we finished the prayer, there was a huge explosion and I fell on the ground hardly able to breath,' he said. 'There was screaming around me in the dark and as I tried to find my way, I was touching bodies and parts of bodies laid on the ground'.

The Al Awdat family home attacked at 07:30 on 13 July 2014:

21. An Israeli drone fired two 'warning' or 'roof knocking' missiles targeting the house of Ahmed Hassan Al Awdat, 36, which is located in Az-Za'faran area in Al Maghazi refugee camp. Less than a minute later, an Israeli military aircraft fired a heavy missile at the house causing its total destruction. According to information available to Al Mezan, Ahmed and his wife left his house after the 'warning' missiles targeted the house while his family, who live in an adjacent house, were still trying to leave their house when the heavy missile attack took place. One woman, Laila Hassan Al A'wadat, 37, was killed from a shrapnel injury to her head, as both houses were destroyed. Three other civilians were injured. The injured have been identified as:

- Fatma Suliman Al A'wadat, 65, critical injury in the head and fractures in the chest and pelvis;
- 'Abla Hasan Al A'wdat, 40; and
- Her son Yaser Riyadh An-Nabaheen, 14.

The Shuheebar family home attacked at 17:30 on 17 July 2014:

22. An Israeli military aircraft fired one missile at a group of children from the Shuheebar family while they were feeding poultry which their family keeps on the rooftop. The house is located in the Sabra neighbourhood west of Gaza City. As a result, three young children were killed, and two other children were injured. The three children who were killed have been identified as:

- Afnan Wesam Shuheebar, 8;
- Jihad Issam Shuheebar, 11; and
- Waseem Issam Shuheebar; 8.

Basil Shuheebar, 8, and Odai Shuheebar, 16, were also injured in the attack. Wesam, the father of the 8-year-old girl, Afnan, is an employee of the police of the Palestinian

Authority, and the children were on the roof of his house in which twelve members of the Shuheebar family live, including eight children.

Al Mezan interviewed Jameela Shuheebar, 65, the grandmother of the deceased children. She said the family were inside the house when the attack occurred. She added that she “rushed to the roof where the sound came from to see my grandchildren's bodies on the ground. All that was there were the fragments of their little bodies and the small bag of chicken food, which they were giving the chicken on the roof. Our neighbours and my sons carried the pieces of flesh to the hospital, where Odai is still lying in the Intensive Care Unit.”

The Abu Jarad family home attacked at 09:25 on 18 July 2014:

23. Israel's military fired two artillery shells at the house of the sons of Khalil Abu Jarad, which is located in Abdel Dayim Street south to Ezbet Beit Hanoun, in the North Gaza district. As a result, eight members of the Abu Jarad family were killed, including five children. The eight fatalities have been identified as:

- Na'eem Mosa Abu Jarad, 24;
- Sameeh Na'eem Abu Jarad, 1.5; (his son)
- Ahlam Mosa Abu Jarad, 17;
- Samar Moua Abu Jarad, 14;
- Abdel Rahman Mosa Abu Jarad, 32;
- Rajaa 'Iliyan Abu Jarad, 28; (his wife)
- Mosa Abdel Rahman Abu Jarad, 8 months; (Rajaa 's son) and
- Haniya Abdel Rahman Abu Jarad, 2 (Rajaa's daughter).

One woman and four children were also injured in the attack. They have been identified as:

- Ne'ma Mosa Abu Jarad, 20;
- Nour Bassam Abu Jarad, 4;
- Mu'men Basim Abu Jarad, 2;
- Rateb Mosa Abu Jarad, 1.5; and
- Ilham Mosa Abu Jarad, 6 months.

Medical sources at the Kamal Odwan Hospital described the injuries of the first three people as critical.

According to Al Mezan's field investigations, the family had gathered in the second floor of their four-storey house. The Israeli military artillery shells hit the third floor and penetrated the roof of the second floor where the family was. The Abu Jarad family house is about 2.4 kilometres away from the Israeli controlled Erez crossing in the north of the Gaza Strip from where the Israeli military fires artillery shells.

It is reported¹³ by a family member, Alian Abu Jarad, 62, that: “There was no warning. Suddenly – boom... [T]here are no fighters here. No one is connected to any political faction. We have a brick factory – we are only concerned with our business. We are civilians. I never thought we’d face this. But now we have to deal with it. What else is there to do?”

The Al Hallaq and Ammar families apartment attacked at 19:20 on 20 July 2014:

24. An Israeli military aircraft fired three missiles targeting the apartment of Hani Mohammed Al Hallaq, 29, which is located on the second floor in the Cordoba Building in the Al Remal neighbourhood west of Gaza City. Two missiles hit the apartment while the third fell at the entrance of the building. A family, also from the Al Hallaq extended family who had evacuated their home in the Al Sheja'iyah neighbourhood and sought refuge with their relatives, was also present in the apartment. As a result of the attack, eleven members of the Al Hallaq family and Allar families were killed, including seven children and three women. One of the deceased, Samar Usama Al Hallaq, was nine months pregnant. The eleven fatalities have been identified as:

- Hani Mohammed Al Hallaq, 19; (the owner of the house);
- Hala Akram Al Hallaq, 29; (Hani's wife)
- Mohammed Hani Al Hallaq, 2; (Hala's son)
- Su'ad Mohammed Al Hallaq, 62; (Hala's mother)
- Samar Usama Al Hallaq, 29; (nine months pregnant)
- Sajji Hassan Al Hallaq, 4;
- Kenan Hassan Al Hallaq, 6;
- Ibrahim Khalil Ammar, 13;
- Eman Khalil Ammar, 9;
- Issam Khalil Ammar, 4; and
- Rahaf Akram Jumaa', 4.

The three members of the Ammar family lived in the first floor of the building. The members of the Jumaa' family had fled the Al Shejaiya neighbourhood and sought refuge with their friends, the Ammar family. Three other people were injured in the attack and medical sources at Shifa Hospital described their injury as moderate.

The Abu Jame' family home attacked at 19:50 on 20 July 2014:

25. An Israeli military aircraft attacked the three-storey house of Tawfiq Ahmad Abu Jame' inhabited by five families and located in the Bani Suhaila town, east of Khan Younis district in the south of the Gaza Strip. The house, which was attacked without prior warning, was completely destroyed in the attack. Civil defense and ambulances crews rushed to the destroyed house to uncover the bodies buried under the rubble. It took them until the next day, Monday 21 July 2014, to uncover the victims. Twenty-six bodies were

¹³ Gaza counts the cost of war: whole families smashed under the rubble; The Guardian online edition; Harriet Sherwood, 15 August 2014 <http://www.theguardian.com/world/2014/aug/15/-sp-gaza-counts-cost-of-war-whole-families-smashed-under-the-rubble>

found of members of the Abu Jame' family, including eighteen children and five women. Only three residents survived and they sustained varying injuries. The twenty-six fatalities have been identified as:

- Fatma Ahmad Abu Jame', 60;
- Sabah Tawfeeq Abu Jame', 35; (Fatma's daughter)
- Razan Tawfeeq Abu Jame', 14; (Fatma's daughter)
- Jawdat Tawfeeq Abu Jame', 13; (Fatma's son)
- Aya Tawfeeq Abu Jame', 12; (Fatma's daughter)
- Haifa Tawfeeq Abu Jame', 9; (Fatma's daughter)
- Tawfeeq Tawfeeq Abu Jame', 4; (Fatma's son)
- Maysa Tawfeeq Abu Jame', 7; (Fatma's daughter)
- Ahmad Tawfeeq Abu Jame', 8; (Fatma's son):
- Shahinaz Waleed Abu Jame', 29,
- Ayyoub Tayseer Abu Jame', 10; (Shahinaz's son)
- Fatima Tayseer Abu Jame', 12; (Shahinaz's daughter)
- Rayan Tayseer Abu Jame', 5; (Shahinaz's son)
- Rinat Tayseer Abu Jame', 2; (Shahinaz's daughter),
- Nojoud Tayseer Abu Jame', 4 months; (Shahinaz's daughter)
- Yasmin Abu Jame', 25, who was pregnant,
- Batoul Bassam Abu Jame', 4; (Yasmin's daughter)
- Suheila Bassam Abu Jame', 3; (Yasmin's daughter)
- Bisan Bassam Abu Jame', 6 months; ; (Yasmin's daughter),
- Yasser Abu Jame', 27,
- Fatima Abu Jame, 26, (Yasser's pregnant wife);
- Sajed Yasser Abu Jame', 7; (Yasser and Yasmin's son)
- Siraj Yasser Abu Jame', 4; (Yasser and Yasmin's son),
- Nour Yasser Abu Jame', 2; (Yasser and Yasmin's son)
- Hosam Abu Geinas, 7, who is the house owner's nephew; and
- Ahmad Suleiman Sahmoud, 34, a visitor.

It is reported¹⁴ by one of the three surviving family members, Bassem Abu Jame, 33, that: “I hit a wall and lost consciousness. I woke up the next day with no idea what had happened to my wife and children. We will never recover from this. It’s like a wound – it might heal, but the scar will be there forever.”

The Siyam family home attacked at 06:20 on 21 July 2014:

26. An Israeli drone fired five missiles near three house of the Siyam family, which is located in the north of Rafah town. Israeli military aircraft had also fired several missiles at a park and two houses in the area. When the Siyam family members heard the explosion of the missiles they evacuated their house. A neighbouring family, the Abu Sneimeh extended family, also evacuated. In total, six families comprising about 34 people left their homes. As soon as they fled their homes, Israeli drones attacked them. As a result,

¹⁴ Ibid.

ten members of the Siyam family were killed, including six children. The ten fatalities have been identified as:

- Kamal Mahrous Siyam, 27;
- Mohammed Mahrous Siyam, 27;
- His wife Smoud Siyam, 26;
- Shirin Mohammed Siyam, (Mohammed's sister-in-law)
- Her sons and daughters Ghaidaa Nabil Siyam, 7;
- Mustafa Nabil Siyam, 9;
- Bader Nabil Siyam, 4;
- Dalal Nabil Siyam, 9 months;
- Her cousin Ahmed Siyam, 15; and
- His brother Ameen Siyam, 15.

Another eight people, including seven children, were injured in the attack.

It is reported¹⁵ by a surviving family member, Nabil Siyyam, 33, whose left arm had to be amputated, that: “The air was full of dust, I couldn’t see anything. I felt my arm hanging by skin, and I was bleeding from the chest... [when the air cleared] I saw my daughter cut into two. I saw my baby thrown 10 metres from her mother. The drones were still in the sky.” He said there was no warning and no reason for the strike. “They have the technology to watch us – they could see there were women and children.”

The Al-Qassas family apartment attacked at 15:50 on 21 July 2014:

27. An Israeli military aircraft fired one missile at an apartment that belongs to Yassir Khader Al Qassas, 40. The apartment is located on the fourth floor in a building on the Al Thalatheeni Street in Al Sabra neighbourhood, south of Gaza City. Yassir and his wife, Summay, had received relatives from Al Qassas and Siyam families, including his mother-in-law, who had become internally displaced persons. These families were living in the Al Zeitoun area, which was under Israeli military attack and had received orders from the Israeli military to evacuate.

The Al Qassas family and their guests were in the house when a heavy missile, fired by an Israeli aircraft, devastated the home. The attack killed ten members of the Al Qassas and the Siyam families, including seven children and three women. The ten fatalities have been identified as:

- Alyaa Yousef Siyam, 35;
- Fayza Siyam, 68;
- Sumayya Al Qassas, 32;
- Islam Al Qassas, 15;
- Arwa Al Qassas, 4;
- Samar Al Qassas, 3;
- Israa' Al Qassas, 7;

¹⁵ Ibid.

- Nesma Al Qassas, 10;
- Lamya Al Qassas, 13; and
- Mohammed Al Qassas, 4.

Four other people, including two children, were injured.

The Abu Eeta family home severely damaged in attack at 00:50 on 23 July 2014:

28. An Israeli military aircraft fired at least one missile at the house of Mohammed Hassan Al 'Ajrami in Tel Az-Za'tar neighbourhood in Jabalia refugee camp. The house was destroyed completely. The neighbouring house of the Abu Eeta family was severely damaged in this incident, killing five family members. The victims included a child and a woman. Ten other people were injured critically or moderately, including five children and a woman. The five fatalities have been identified as:

- Ibrahim Abdallah Abu Eeta, 67;
- Jameela Saleem Abu Eeta, 55; (Ibrahim's wife)
- Mohammed Abu Eeta, 34; (their son)
- Ahmed Ibrahim Abu Eeta, 31; (their son) and
- Adham Ahmad Abu Eeta, 4; (Ahmad's son).

A nearby mosque, ten houses and three ambulances were additionally damaged in the attack.

The Al Najjar family home attacked at 03:10 on 26 July 2014:

29. An Israeli military aircraft fired one missile at a house belonging to Samir Hussein Mohammed Al Najjar in the east of Khan Younis. Three families, comprised of seventeen members, were living in the three-storey house. The house was entirely destroyed by the attack, killing twenty members of the Al Najjar family, including eleven children and six women. Two of the women were pregnant. Only six people in the house survived the attack, all sustaining injuries. The twenty fatalities have been identified as:

- Samir Hussein Mohammed Al Najjar, 58;
- Ghaliya Mohammed Al Najjar, 56, died in the attack with her children:
- Majid Samir Al Najjar, 19;
- Kifah Samir Al Najjar, 24.
- Samar Samir Al Najjar, 27, died in the attack with her children:
- Amir Hammouda Hussein abu Shahla, 2;
- Islam Hammouda Hussein abu Shahla, 3;
- Amira Hammouda Hussein abu Shahla, 8 months.
- Riham Fayez Al Najjar, 25, a pregnant woman, died in the attack with her children:
- Olfat Samir al-Najjar, 4;
- Samir Samir al-Najjar, 1;
- Motaz Samir al-Najjar, 6.

- Iman Salah Mahmoud Al Najjar, 23, also a pregnant woman, was killed with her daughter,
- Ghaliya Mohammed Sameer al-Najjar, 1.
- Bara'a Salah Mahmoud Al Reqeb, 11;
- Khalil Mohammed Najjar, 60;
- Rawan Khaled Mohammed Al Najjar, 17;
- Ahmad Khaled Mohammed Al Najjar, 14;
- Somayya Harb Al Najjar, 50, and her son
- Hani Suleiman Mohammed Al Najjar, 7.

The Al Helu family recovered from the rubble of their home on 26 July 2014:

30. On 20 July 2014, the neighbourhood of Shejai'ya was targeted by indiscriminate and intense artillery fire and airstrikes. Six days after these attacks in Shejai'ya, the neighbourhood was accessible to residents as well as rescue teams. Al Mezan were able to reach the neighbourhood and report on the dozens of people being pulled out from under the rubble where they had been decomposing for six days. Ten of these victims were from the Al Helu family, four of them being children. The ten fatalities have been identified as:

- Jihad Mahmoud Al Helu, 59;
- Seham Atta Al Helu, 57;
- Mohammed Jihad Al Helu, 29;
- Tahrir Jihad Al Helu, 20;
- Jajiba Jihad Al Helu, 15;
- Ahmed Jihad Al Helu, 29;
- Hedaya Talal Al Helu, 25;
- Maram Ahmed Al Helu, 2;
- Kareem Ahmed Al Helu, 5 months;
- Karam Ahmed Al Helu, 5 months.

The Abu Jaber family home attacked at 00:30 on 29 July 2014:

31. An Israeli military aircraft launched a missile at a two-storey house belonging to the heirs of Husni Mohammed Abu Jaber, in which nine people live in al-Boreij refugee camp. As a result of the attack, the house and two nearby houses were destroyed, killing sixteen members of the Abu Jaber family, including six children, one pregnant woman and two elderly people. The sixteen fatalities have been identified as:

- Anwar Mohammed Abu Jaber, 35;
- Lina Kifah Abu Jaber, 23;
- Leen Anwar Abu Jaber, 3;
- Salma Anwar Abu Jaber, 1;
- 'Aesha Hamdan Abu Jaber, 23;
- Mohammed Ra'ed Abu Jaber, 3;
- Fadel Hamdan Abu Jaber, 19;

- Hamdan Mohammed Abu Jaber, 77; Anwar Mohammed Salem Abu Jaber, 35;
- Jaber Hamdan Abu Jaber, 27;
- Sama Ra'ed Abu Jaber, 1;
- Tuqa Salah Khalil Abu 'Issa Jaber, 1;
- Ayman Salah Abu 'Oun, 26;
- Anwaar Mohammed Salem 25;
- Dina Hamdan Abu Jaber, 26, pregnant;
- Somaya Abdel Rahman Abu Jaber, 32;
- Hala Ahmed Abu Jaber, 4; and
- Fadda Ghannam Abu Jaber, 61.

The Abu Khousa family home attacked at 03:10 on 29 July 2014:

32. An Israeli drone fired a missile at a three-storey house belonging to Mohammed 'Atiya Abu Khousa, in which twenty people live, in the al-Sawarha area in the west of al-Nussairat refugee camp. A few minutes later, an Israeli military aircraft launched a missile at the house and destroyed it. As a result, nine members of the Abu Khousa family, including seven children and a woman, were killed. The nine fatalities have been identified as:

- Ibrahim 'Abed Rabbu Abu Khousa, 33;
- Sabreen Mohammed Abu Khousa, 33;
- Fadi Ibrahim Abu Khousa, 2;
- Fatema Ibrahim Abu Khousa, 3;
- Mohammed Ibrahim Abu Khousa, 1;
- Shahad Ibrahim Abu Khousa, 10;
- Yazan 'Emad Abu Khousa, 3;
- Rital Basheer Abu Khousa, 1; and
- Jana Bilal Abu Khousa, 1.

The Abu Zaid family home attacked at 00:10am on 29 July 2014:

33. An Israeli military aircraft launched four missiles at a two-storey house belonging to 'Abdullah Hassan Abu Zaid in Tabbat Zare' area in the east of Rafah. As a result of the attack, seven members of the Abu Zaid family were killed, including three children and a pregnant woman. Fourteen members of the family were also wounded. The house and another neighbouring house were destroyed. The seven fatalities have been identified as:

- Ahmed 'Abdullah Abu Zaid, 24;
- Shamma Wa'ek Abu Zaid, 16;
- Sabreen Khader Abu Zaid, 30;
- Bissan Eyad Abu Zaid, 12;
- Miriam Marzouq Abu Zaid, 31, pregnant;
- 'Abdullah Nidal Abu Zaid, 5; and
- Palestine Mohammed Abu Zaid, 26.

The Duhair family home attacked at 04:35 on 29 July 2014:

34. An Israeli military aircraft launched two missiles at a house belonging to the sons of Mahmoud Duhair in Musabbeh neighbourhood in the north of Rafah. The house was destroyed and twenty-one members of the Duhair family were killed. The fatalities included nine children, one elderly person and a pregnant woman. The twenty-one fatalities have been identified as:

- Turkiya Khalil Duhair, 66;
- 'Ezzit Salama Duhair, 23, a freelance journalist;
- 'Omar Salam Duhair, 38;
- Karam Mahroos Duhair, 25; a nurse;
- Mohammed 'Omar Duhair, 10;
- Maria 'Omar Duhair, 12;
- Yasmeen Ahmed Duhair, 24;
- Tasneem Mohammed Duhair, 8;
- Wafaa' 'Abdul Raziq Duhair, 28, pregnant.
- Reem 'Abdul Basset Duhair, 32;
- Mo'men 'Omar Duhair, 9;
- Ghaida' 'Omar Duhair, 7; and
- 'Ola Mahmoud Duhair, 19.
- Mahmoud Salama Duhair, 46;
- Jamalata Mahmoud Duhair, 40;
- Mohammed Mahmoud Salama Duhair 7;
- Arwa Mahmoud Salama Duhair, 16;
- Shorouq Mahmoud Salama Duhair, 19;
- Yamen Omar Salama Duhair, 5; and
- Salama Mahmoud Salama Duhair, 12.

Somaya Abed Hamad Duhair, 52, died on 6 August 2014 from injuries sustained in the attack.

Three Al- Najjar family homes attacked on early morning of 29 and 30 July 2014:

35. Israeli military aircraft launched airstrikes at three family homes belonging to families with the name Al Najjar on the early morning of 29 and 30 July 2014. Seventeen members between the Al Najjar families were killed as a result of these military attacks.

An Israeli military aircraft launched a missile at a three-storey house belonging to Mohammed 'Ata Al-Najjar, 50, in Gizan al-Najjar area in the south of Khan Yunis. This attack killed six family members, including three children. The seven fatalities have been identified as:

- Mohammed Atta Al Najjar, 49;
- Issam Al Najjar, 24;
- Samaa' Mohammed Al Najjar, 15;
- 'Ata Mohammed 'Ata Al-Najjar, 29;

- Mohammed 'Ata Mahmoud Al Najjar, 1;
- Rafif 'Ata Mahmoud Al-Najjar, 3;
- Khaled 'Omar Al-Najjar, 21.

An Israeli military aircraft launched a missile at the neighbouring house belonging to Ibrahim Hassan Al-Najjar. The house was destroyed and seven members of the family, including five women, an elderly person and a child, were killed. The seven fatalities have been identified as:

- Fawzia Qassem Hannoun Al-Najjar, 81;
- Mona Ismail Khamis Al-Najjar, 43;
- Jihad Ibrahim Hassan Al-Najjar, 25;
- Mona Jihad Ibrahim Al-Najjar, 1;
- Maisaa' Abdul Samee' Mousa Al-Najjar, 18;
- Ibtissam Abdel Samee' Harb Al-Najjar, 21; and
- Aya Ibrahim Hassan Al-Najjar (Abu Sitta), 23.

On 30 July 2014 just after midnight, military aircraft launched a missile at a house belonging to 'Izziddin 'Omar Al-Najjar in Ma'an area. As a result, the owner's wife, daughter and grandchild were killed:

- Siham Raji Khalil Al-Najjar, 46;
- 'Aida Khalil Al-Najjar, 24; and
- Sara Ahmed Sidqi 'Abdul Gharfour, 1.

The Al-Hashash family home attacked at 06:00 on 29 July 2014:

36. An Israeli drone fired a missile near a house belonging to Ahmed Sa'id Al-Hashash in Al-Hashash neighbourhood in the north of Rafah. When members of the Al-Hashash family attempted to evacuate the house taking their disabled mother out, the Israeli drone fired a missile at them. When a number of their relatives attempted to help them, the Israeli drone fired a third missile at them. As a result of these attacks, six family members were killed, including one child. Eleven further people were wounded. The six fatalities have been identified as:

- Ibrahim Ahmed Al-Hashash, 16;
- Mohammed Ahmed Al-Hashash, 18;
- Mas'oud Ahmed Al-Hashash, 20;
- Sa'id Ahmed Al-Hashash, 20;
- Hana' Ali Al-Hashash, 43; and
- Mohammed Mousa Al-Hashash, 20.

The Abu 'Amer, Al Najjar, Brecker, and Mu'ammam families apartment attacked at 16:10 on 29 July 2014:

37. An Israeli military aircraft targeted an apartment building owned by Karam Mohammed Mahmoud Al Dali in Khan Younis city centre. The four-storey building, which lies on an area of 400 square metres, is home to five families who rent apartments in it. The military attack destroyed the building as the residents were inside their homes, killing and injuring almost all of them, and causing severe damage to adjacent houses. By the time of 14:00 on 30 July 2014, rescue teams were able to recover thirty-five dead bodies and twenty-seven wounded persons from under the rubble of the building and neighbouring houses. Several wounded persons were critically injured.

Sixteen of the victims were from the Abu 'Amer family; eight from the Al Najjar family; six from the Breeka family; four from the Mu'ammam family; and one from families who live in adjacent houses. Eighteen of the fatalities were children, and seven were women. The thirty-five fatalities have been identified as:

- Waddah Hassan Abu 'Amer, 39; (a leader in DFLP)
- Oroba Sulaiman Abu 'Amer, 41; (Waddah's wife)
- Omar Waddah Abu 'Amer, 12, (their son)
- Abdel Ghani Waddah Abu 'Amer, 11; (their son)
- Emad Waddah Abu 'Amer, 10; (their son)
- Issa Waddah Abu 'Amer, 8; (their son)
- Ez Eddin Waddah Abu 'Amer, 4; (their son)
- Ahmed Suleiman Abu 'Amer, 40;
- Mona Hajjaj Abu 'Amer, 41; (his wife)
- Mohammed Ahmed Abu 'Amer, 12; (Ahmed's son)
- Marah Ahmed Abu 'Amer, 10; (Ahmed's daughter)
- Yasser Ahmed Abu 'Amer, 9; (Ahmed's son)
- Marwa Ahmed Abu 'Amer, 5; (Ahmed's daughter)
- Suleiman Ahmed Abu 'Amer, 2; (Ahmed's son)
- Ahmed Hasan Abu 'Amer, 36;
- Mohammed Hasan Abu 'Amer, 36;
- Jamil Ahmad Al Najjar, 48;
- Walaa' Jamil Al Najjar, 23;
- Mohammed Jamil Al Najjar, 12; (Ahmed's son)
- Do'aa Jamil Al Najjar, 18; (Ahmed's daughter)
- Wael Jamil Al Najjar, 25; (Ahmed's son)
- Aya Jamil Al Najjar, 19; (Ahmed's daughter)
- Alaa Jamil Ahmed Al Najjar, 21;
- Layali Wael Al Najjar, 3
- Fayiz Ahmed Breeka, 55;
- Sobhiya Mu'nis Breeka, 59; (Fayiz's wife)
- Ahmed Fayiz Breeka, 32; (their son)
- Jana Fayiz Breeka, 3; (Ahmed's daughter)

- Lama Fayiz Breeka, 1; (Ahmed's daughter)
- Osama Fayiz Breeka, 16; (Ahmed's son)
- Ahmed Marzouq Mu'ammam, 33;
- 'Hala Ahmed Mu'ammam, 1; (Ahmed's daughter)
- Yazan Ahmed Mu'ammam, 3; (Ahmed's son)
- Hind Marzouq Mu'ammam, 29; (Ahmed's sister) and
- Aya Sami al Ramlawi, 9;

The Balata family home attacked at 16:10 on 29 July 2014:

38. Israeli military tanks opened intensive artillery fire at the neighbourhoods of Al Faluja and Al Aqsaseeb. The shelling hit the house belonging to Naeem Nazmi Balata, killing ten members of his family. The fatalities included four children and five women. The ten fatalities have been identified as:

- Naeem Nazmi Balata, 45;
- Sahar Mtawi' Balata, 30 (his wife);
- Meryam Naeem Balata, 24; (his daughter)
- Do'aa Naeem Balata, 22; (his daughter)
- Hana' Naeem Balata, 19; (his daughter)
- Israa' Naeem Balata, 13; (his daughter)
- Wafaa' Naeem Balata, 21; (his daughter)
- Alaa' Naeem Balata, 14; (his daughter)
- Yehia Naeem Balata, 4; (his son) and
- Hadeel Abdel Kareem Balata, 17; (his niece)

The Al Khalili family home attacked at 09:00 on 30 July 2014:

39. The Israeli military fired two artillery shells at the house of Mohammed Atta Al Khalili, which is located in the Al Tuffah neighbourhood in the east of Gaza City. One of the shells exploded into the dining room of the garden where the Al Khalili family were having breakfast, killing seven family members. The fatalities included three children and two women. One of the deceased women was pregnant. A further child was critically injured. The seven fatalities have been identified as:

- Ashraf Mahmoud Al Khalili, 37;
- Ahmed Mahmoud Al Khalili, 27 (Ashraf's brother)
- Aya Mohammed Al Khalili, 23; (Ahmed's pregnant wife)
- Lama Ahmed Al Khalili, 5; (Ahmed and Aya's daughter)
- Nedaa' Ziyad Al Khalili, 28; (Ashraf's wife)
- Deema Ashraf Al Khalili, 4; (Ashraf and Nedaa's daughter) and
- Ziyad Ashraf Al Khalili, 3; (Ashraf and Nedaa's son).

The Al Bayoumi family home attacked at 18:40 on 31 July 2014:

40. An Israeli military aircraft fired a missile at the house of the Al Bayoumi family, which is located in Block 5 in Al Nusierat refugee camp. Eighteen members of the family were in the house when it was targeted. The house was destroyed completely and the neighbouring house was severely damaged. Rescue teams were able to recover the dead bodies of twelve women and children from the Al Bayoumi family home and the next door house. The twelve fatalities have been identified as:

- Hadeel Amer Al Bayoumi, 14;
- Abeer Amer Al Bayoumi, 27; (Hadeel's sister)
- Aseel Amer Al Bayoumi, 16; (Hadeel's sister)
- Laila Darweesh Abu Shouqa, 43;
- Mohammed Abdel Majeed Al Bayoumi, 14
- Labiba Ibrahim Abu Shouqa, 24;
- Elham Ibrahim Abu Shouqa, 18; (Labiba's sister)
- Malak Shakir Abu Shouqa, 2;
- Hasan Nasser Zaqout, 21;
- Abeer Nahidh Al Assar, 27; (nine months pregnant)
- Rinad Ashraf Al Assar, 1.5 and
- Lana Ra'fat Al Assar, 7.

The Al Farra family home attacked at 03:10 on 1 August 2014:

41. An Israeli drone fired three missiles at a three-storey house belonging to 'Abdul Malek 'Abdul Salam Al-Farra, 60, in which fifty people live, in Ma'an area. The missiles penetrated the second and third floors, which caused extensive damage and wounded members of the Al Farra family. When the family were trying to leave their house, an Israeli military aircraft launched a missile at the house with members of the family less than 50 metres away from their home. As a result, nine members of the family, including four children and a pregnant woman, were killed. The nine fatalities have been identified as:

- 'Abdul Malek 'Abdul Salam Al-Farra, 60;
- Ussama 'Abdul Malek Al-Farra, 34;
- 'Awatef 'Aziz Al-Din Al-Farra, 31, pregnant in the 8th month;
- 'Abdul Rahman Al-Farra, 8;
- Lujain Bassem Al-Farra, 4;
- Nadine Mahmoud Al Farra, 16;
- Mohammed Mahmoud Al Farra, 12;
- Yara Mahmoud Al-Farra, 8; and
- 'Emad Nasrallah Al-Farra, 28.

The Abu Suleiman family home attacked at 02:40 on 2 August 2014:

42. An Israeli military airstrike hit the house of the Abu Suleiman family in Rafah, killing seven family members. The fatalities included a woman and six children. The seven fatalities have been identified as:

- Wafaa Younis Abu Suleiman, 28;
- Rana Raed Abu Suleiman, 10;
- Mohammed Rami Abu Suleiman, 8;
- Manar Rami Abu Suleiman, 11;
- Ahmed Rami Abu Suleiman, 12;
- Hanan Rami Abu Suleiman, 5;
- Ahmed Rami Abu Suleiman, 3;

The Abu Madi family home attacked at 14:30 on 2 August 2014:

43. An Israeli military aircraft fired at least one missile at the house of Yousef Dawoud Abu Madi, 68, in the Al Nuseirat refugee camp. The three-storey family home was completely destroyed. The attack killed six members of the Abu Madi family and another ten were injured. The attack was launched without any prior warning. Three of the deceased were children. A woman who was seven months pregnant was injured and lost her baby. The six fatalities have been identified as:

- 'Hala Shadi Abu Madi, 10 days;
- Yousef Shadi abu Madi, 7; (her brother)
- Ameen Yousef Abu Madi, 10;
- Hassan Yousef Abu Madi; (Ameen's brother)
- Abdel Kareem Dawoud Abu Madi, 23;
- Yousef Dawoud Abu Madi, 68.

The Al Ghoul family home attacked at 07:00 on 3 August 2014:

44. An Israeli military airstrike hit the house of the Al Ghoul family, which is located in the dense Yebna refugee camp in central Rafah. The house was destroyed while the family were inside it, killing eight family members. The deceased included three children. The eight fatalities have been identified as:

- Ismail Mohammed Al Ghoul, 63;
- Khadra Khaled Al Ghoul, 65; (Ismail's wife)
- Mohammed Ismail Al Ghoul, 42; (Ismail's son)
- Wael Mohammed Al Ghoul, 13; (Mohammed's son)
- Malak Wael Al Ghoul, 6;
- Mustafa Wael Al Ghoul, 1 month;
- Hanadi Ismail Al Ghoul, 25; and
- Asmaa' Ismail Al Ghoul, 23.

The Al Majdalawi family home attacked at 15:30 on 3 August 2014:

45. An Israeli military aircraft fired at least one missile at the house of Abdel Hadi Mahmoud Al Majdalawi, which is located in the west of Jabalia. The house was attacked while the Al Majdalawi family were inside it. No warning had been given to the family prior to the attack. As a result of the attack, five members of the Al Majdalawi family were killed, including three children. Another seven were injured, including two children and two women. The five fatalities have been identified as:

- Mahmoud Abdel Hadi Al Majdalawi, 24; (the house-owner's son)
- Abdel Raziq Abdel Hadi Al Majdalawi, 19; (the house-owner's son)
- Abdallah Abdel Hadi Al Majdalawi, 13; (the house-owner's son)
- Rawan Ahmed Al Majdalawi, 9; (the house-owner's granddaughter); and
- Mahmoud Ahmed Al Majdalawi, 8; (the house-owner's grandson).

The Abu Nijm-Al Masri family home attacked at 20:50 on 3 August 2014:

46. An Israeli military aircraft fired at least one missile at the house of Mohammed Abdel Karim Abu Nijm-Al Masri, which is located in Block 8 in Jabalia refugee camp, near the Al Tawba mosque. The two-storey house was destroyed, killing ten people. Eight of the deceased were from the Abu Nijm-Al Masri family, including three children, a woman and a 97 year old man. The ten fatalities have been identified as:

- Mohammed Abdel Karim Abu Nijm-Al Masri, 55; and his three sons
- Bilal Mohammed Abu Nijm-Al Masri, 27;
- Mohammed Mohammed Abu Nijm-Al Masri, 21;
- Ahmed Mohammed Abu Nijm-Al Masri, 17;
- Abdel Karim Mohammed Abu Nijm-Al Masri, 97; (the house owner's father)
- Soha Hamed Abu Nijm-Al Masri, 30;
- Raghad Mohammed Abu Nijm-Al Masri, 3; (Soha's daughter)
- Shaimaa' Wael Qasim, 14; (Raghad's cousin)
- Danian Kamel Mansour, 41;
- Abdel Nasser Al 'Ajouri, 26.

Another 22 people were injured in this attack, including ten children and three women. An approximate number of ten adjacent houses were also damaged.

The Al Bakri family recovered from the rubble of their home on the afternoon of 4 August 2014:

47. On the afternoon of 4 August 2014, Palestinian rescue teams recovered the dead bodies of a baby, a woman and two men from the Al Bakri family house in the Shati (Beach) refugee camp. Their house was directly targeted by the Israeli military airstrike on 3 August 2014. The deceased body of one girl was recovered from under the rubble on the

day of the attack. Another child who was injured in the attack died at hospital on the morning of 4 August 2014. In total, six members of the Al Bakri family were killed in the attack, including three children and one woman. The six fatalities have been identified as:

- Ibtisam Ibrahim Al Bakri, 31;
- Ibrahim Mohammed Al Masharwi, 32;
- Ramadan Ahmed Al Bakri, 36;
- Aseel Mohammed Al Bakri, 4;
- Asmaa' Mohammed Al Bakri, 4 months; and
- Kamal Ahmed Al Bakri, 4.

The Uwaida family home attacked on 4 August 2014:

48. An Israeli drone fired a missile at the house of Abdel Azeez Uwaida, which is located in the Al Brazil neighbourhood in Rafah. Two children, who were on the roof of their house, were killed in the attack. The house, which is home to 35 persons, was damaged. The two fatalities have been identified as:

- Mohammed Ahmed Uwaida, 13; and
- Amal Amjad Uwaida, 5.

The Wahdan family recovered from the rubble of their home on the afternoon of 5 August 2014:

49. Medical and rescue teams were able to recover the dead bodies of eight members of the Wahdan family from under the rubble of their three-storey house in the east of Beit Hanoun town after an Israeli artillery attack ten days prior on 26 July 2014. The fatalities span four generations of the Wahdan family. The eight fatalities have been identified as:

- Zaki Abdel Rahman Wahdan, 67;
- Suad Ahmed Wahdan, 65;
- Baghdad Ahmed Wahdan, 51; (daughter in law)
- Zeinab Hatim Wahdan, 22; (grandchild)
- Ahmed Hatim Wahdan, 13; (grandchild)
- Hussein Hatim Wahdan, 9; (grandchild)
- Somoud Hatim Wahdan-Saqr, 22; (grandchild) and
- Ghena Younis Saqr, 2 (Somoud's daughter).

It is reported¹⁶ by a family member, Amin Zaki Wahdan, 37, that the night before the attack on the Wahdan family home, the Israeli military ordered them to not to use a respite in the hostilities to leave the home: "I talked to them on the phone at nine o'clock

¹⁶ 'Israeli attacks on Gaza families must be investigated at war crimes says human rights groups'; Daily Telegraph online; Robert Tait; 17 August 2014.
<http://www.telegraph.co.uk/news/worldnews/middleeast/gaza/11039636/Israeli-attacks-on-Gaza-families-must-be-investigated-as-war-crimes-say-human-rights-groups.html>

in the evening and the Israelis had left the area 10 minutes before and told them not to move, to stay in the house”.

The Al Dalu family home attacked on 19 August 2014:

50. An Israeli military aircraft fired six missiles at the house of Rabah Al Dalu, 51, which is located in the Al Sheikh Radwan neighbourhood north of Gaza City. The three-storey house is inhabited by the Al Dalu family and two apartments within it are leased out to another two families. Five people were recovered from under the rubble of this house by the 20 August 2014, including two children and two women. Two of the victims were Wedad Mustafa Daif-Afour, 28, who is the wife of the commander of the Al Qassam Brigades, Mohammed Daif, and his seven-month old son, Ali Mohammed Daif. The further three fatalities identified by 20 August 2014 were:

- Ahmed Rabah Al Dalu, 20;
- Wafaa' Hussein Al Dalu-'Aabed, 47,
- and her son Mustafa Rabah Al Dalu, 14.

On Thursday 21 August 2014, Palestinian rescue teams recovered the deceased body of two year old Sara Mohammed Daif, whose mother and brother were killed in the attack.

Another fifteen people were injured in this attack, including two children and two women. Al Mezan verified that four houses near the Al Dalu family house were severely damaged while another twenty houses were partially damaged and dozens of other houses were lightly damaged.

The Al Louh family home attacked at 04:45 on 20 August 2014:

51. An Israeli military aircraft launched a strike against the house of Mustafa Mahmoud Al Louh, 62, which is located in the Al Hikr neighbourhood, south of Deir Al Balah. The house was completely destroyed. The adjacent house which belongs to Mustafa's son, Ra'fat, 32, was also completely destroyed. As a result of this attack, eight members of the Al Louh family were killed, including three children and a pregnant woman. Another twelve people were injured in this attack, including three children and five women. The eight fatalities have been identified as:

- Ra'fat Mustafa Al Louh, 32;
- Nabeela Eed Al Louh – Abu Rkab, 28 (Ra'fat's 9-month-pregnant wife);
- Mustafa Ra'fat Al Louh, 10 (Ra'fat and Nabeela's son);
- Maysara Ra'fat Al Louh, 7 (Ra'fat and Nabeela's son);
- Farah Ra'fat Al Louh, 6 (Ra'fat and Nabeela's son);
- Ahmed Mustafa Al Louh, 22 (Ra'fat's brother);
- Mohammed Mustafa Al Louh, 22 (Ra'fat's brother); and
- Iman Younis Al Louh. 17.

The Kellab family home attacked at 02:30 on 21 August 2014:

52. An Israeli military aircraft fired nine heavy missiles at the house of Nasser Kellab, which is adjacent to the houses of the Younis family and the Abu Slaimeh family in the area of Tel As Sultan in the west of the town or Rafah, in the south of the Gaza Strip. The attack, which may have targeted three leaders of the Palestinian armed group, the Al Qassam Brigades, killed ten people. The three leaders of the Al Qassam Brigades were killed, along with four of the house residents and four neighbours. The three-storey targeted house was completely destroyed and six other houses were severely damaged. The eleven fatalities have been identified as:

- Mohammed Ibrahim Abu Shalama, 40; (Al Qassam leader in southern Gaza)
- Raed Sobhi Al Attar, 40; (Al Qassam leader in Rafah)
- Mohammed Hamdan Barhoum, 45; (from Al Qassam Brigades)
- Yousef Nasser Kellab, 75;
- Nazeera Ramadan Kellab, 40;
- Ahmed Nasser Kellab, 17; (Nazeera' son)
- Yousef Nasser Kellab, 15; (Nazeera' son)
- Hassan Hussein Younis, 75; (neighbour)
- Amal Ibrahim Younis, 53; (Hassan Younis' wife)
- Seba Rami Younis, 4; and
- Aysha Ismail Atiyeh, 63; (neighbour).

Among the casualties were Mr Hassan Younis; a retired education veteran, aged 75, his wife Amal Ibrahim Younis-Al Bilbisi, 53, and Seba Rami Younis, 4. Mr Hassan Younis is the father of Al Mezan's director, Issam Younis, and Seba Rami Younis is his niece. Two of Issam's sisters-in-law; Hadeel, 37, and Seham, 42; two of his nephews, Hassan, 29, and Ahmed, two months; and his niece, Reema, 3, were also injured.

The house of another Al Mezan employee, Yousef Abu Slaimeh, also sustained severe damage and seventeen of his family members were injured; including his parents Fatihyya and Abdel Fattah; his wife Hanan, 34; his four children Yasmeeen, 12, Hassan, 10, Saja, 7, and Sabah, 4 months; his brother Mohammed, 38, and his wife Ghada, 36; his brother Ahmed, 34, and his wife Heba, 29; and his brother Ibrahim, 32, and his wife Yasmeeen, 29; and his sister-in-law Falasteen, 26, and his nephews Huthaifa, 1, and Baraa', 13; and his niece Israa', 8.

Another thirty-one people were injured in this attack, including thirteen children and ten women.

The Abu Dahrouj family home attacked at 00:15 on 23 August 2014:

53. An Israeli military aircraft fired a missile at the house of Shehda Abed-Rabbo Abu Dahrouj, 68, which is located in the Al Zawaydeh village. The house was completely destroyed killing five members of the Avu Dahrouj family, including two children and two women. The five fatalities have been identified as:

- Hayel Shehda Abu Dahrouj, 28;
- Hoda Mohammed Abu Dahrouj, 25; (Hayel's wife)
- Abdallah Hayel Abu Dahrouj, 3; (Hayel and Hoda's son)
- Abdel Hadi Hayel Abu Dahrouj, 2; (Hayel and Hoda's son);
- Hayat Abed-Rabbo Abu Dahrouj, 50 (Hayel's aunt).

Three further members of the Abu Dahrouj family were injured, including the house owner and two children: Mohammed Suleiman Abu Dahrouj, 10; and his brother Abdel Hameed, 8. Mohammed sustained critical injuries. Several houses in the vicinity of the attacked house were damaged.

The house owner, Shehda Abed-Rabbo Abu Dahrouj, informed Al Mezan that the Israeli military had initially attacked the house at around 5:30 pm on Wednesday 16 July 2014. The family were unable to find a house to rent, so they stayed in the ground floor, which was still standing, to live in. The attack on 23 August 2014 destroyed the remainder of the house while they were inside it. He added that when neighbours and rescue teams were trying to recover his family members from under the rubble, the Israeli military fired a missile at an empty piece of land near them.

The Mheesin family home attacked at 14:00 on 23 August 2014:

54. An Israeli military aircraft fired one missile at a house belonging to Abdul Jawad Mheesin, 67, which is located behind the Yafa Hospital in Deir Al Balah town. Ten families comprised of seventy members lived in the four-storey house which was completely destroyed in the attack. An Israeli military drone fired a 'warning' missile at the house seven minutes prior to this attack. Three people were killed in the subsequent missile attack. The three fatalities have been identified as:

- Suheir Abu Meddin, 43;
- Nisreen Ahmad, 38; and
- Hussein Ahmad, 8 years.

Suheir and her aged parents had been renting an apartment on the third floor in the targeted house ever since they had to evacuate their house in the east of Al Bureij camp. Their neighbours helped her get her elderly parents down the stairs and they made it out of the house. Suheir returned to the house to pick up personal belongings. However, the heavy missile strike occurred when she was inside the house, and she was killed. Her body was recovered from under the rubble of the house.

The attack also destroyed the next door house, which is owned by Khalid Hussein Ahmed, 43. Khalid's wife, Nisreen Abu Jayyab, 38; and son, Hussein, 8, were killed.

Khalid Hussein Ahmed informed Al Mezan that the Israeli military called a neighbour and informed him that a four-storey building would be targeted without specifying which building. Khalid was outside of his house when he heard of the warning. He called his

wife and she told him that the bombing was not expected to be near them. However, Khalid then received a phone call from one of his neighbours informing him that a missile attack occurred just near his house. He rushed back to his house to evacuate his family. Once he entered his house, he shouted asking his wife and children to leave. They started to move to leave the house. At that moment, Khalid heard a very loud explosion and was injured from debris. He said he could only hear the voice of his daughter, Mona, 8, who is the twin of his son, Hussein. She was screaming from among the rubble. Neighbours carried Khalid and his daughter to the hospital, where he was informed that his wife and son were deceased.

The Joudeh family home attacked at 16:15 on 24 August 2014:

55. An Israeli military drone fired at least one missile at the house of Issam Mustafa Joudeh, which is located in Tel Al Za'tar neighbourhood in Jabalia. The attack killed Issam's wife and four children. The five fatalities have been identified as:

- Rawia Ibrahim Mohammed-Joudeh, 43,
- Tasneem Mustafa Joudeh, 14;
- Raghad Mustafa Joudeh, 12;
- Mohammed Mustafa Joudeh, 8;
- and Osama Mustafa Joudeh, 6.

Issam's son, Tha'ir, 13, was critically injured and had his left leg amputated. Issam Mustafa Joudeh informed Al Mezan that his family were attacked as they were sitting in their garden. He was inside the house when the explosion occurred. When he went to the garden, he saw the bodies of his wife and children laid on the ground covered in blood. Issam cannot understand why the Israeli military attacked his house; an attack that also damaged three neighbouring houses and his own car. Only his daughter, Rahaf, 11, survived the attack as she was at the local grocery near their house when the attack occurred. She has been left traumatised.

The Tanboura family home attacked at 10:40 on 25 August 2014:

56. An Israeli military aircraft fired two missiles at the house of Radad Ahmed Tanboura, 36, which is located in the town of Beit Lahiya. The two-storey house was completely destroyed without any prior warning given of the attack. Three members of the Tanboura family were killed, including two children. Another nine people from the family and their neighbours were injured, including three children and two women. The three fatalities have been identified as:

- Radad Ahmed Tanboura, 36;
- Ahmed Radad Tanboura, 15; and
- Anna Radad Tanboura, 13.

Legal Framework:

International humanitarian law

57. A fundamental principle of international humanitarian law is that civilians and civilian objects may never be the object of a military attack. Civilian objects are defined as anything not considered a military objective, and include homes, apartments, businesses, places of worship, hospitals, schools, and cultural monuments. Civilian objects are legally prohibited against direct attacks, unless they are being used for military purposes and thus become military objectives. Where there is doubt about the nature of an object, the warring party must presume it to be civilian.
58. A corollary of this principle is indiscriminate attacks are prohibited under international humanitarian law. Indiscriminate attacks are those that strike military objectives and civilians or civilian objects without distinction. A further corollary of this principle is attacks which violate the principle of proportionality are prohibited. An attack is disproportionate if the likelihood of civilian casualties would be disproportionate to the military gain.
59. Al Mezan and LPHR submit that the large-scale, deliberate and systematic Israeli military attacks against family houses are in clear violation of international humanitarian law. These military attacks clearly appear to be unlawful because either these family houses are civilian objects and therefore cannot be a legitimate military target, or the likelihood of civilian casualties would be disproportionate to the military gain. This remains the legal position whether or not a home merely belongs to an activist of a Palestinian armed group. The apparent stance taken by Israel that the homes of people associated with Hamas are legitimate military targets is incompatible with any reasonable interpretation of the relevant provisions and principles of international humanitarian law.
60. Customary international humanitarian law provides a narrow definition of what constitutes a legitimate military target, which permits aiming attacks only at targets that make an effective contribution to military action, and whose destruction, capture or neutralisation can provide a definite military advantage.¹⁷
61. This customary international law principle is reflected in Article 53 of the Fourth Geneva Convention, which provides that a house is prohibited from destruction by an occupying power, except where such demolition is absolutely necessary in the context of the given military operation.
62. The principle of 'absolute military necessity' incorporates clear cumulative conditions:

¹⁷ Customary IHL, Rule 8, International Committee of the Red Cross http://www.icrc.org/customary-ihl/eng/docs/v1_cha_chapter2_rule8

- i) The individual house was offering an essential and immediate contribution to the enemy's military operation and was, therefore, endangering the security of the occupation forces;
- ii) The demolition of the house was, at the time, an adequate response to that specific threat and there was no less intrusive response possible; and
- iii) The demolition of the house offered concrete military advantages that outweigh the damage caused to the civilian asset and its consequences on the life of individuals and families.

- 63.** If the demolition of a house fails to fulfil one of the criteria, it is a violation of Article 53 of the Fourth Geneva Convention.
- 64.** According to Al Mezan's thorough monitoring and initial investigation of incidents during Israel's military operation in Gaza between 7 July 2014 and 26 August 2014, there is significantly no evidence that indicates any of the hundreds of inhabited houses attacked by the Israel's military forces hosted weapons or were used for military purposes. Consequently, there is no apparent evidential basis for any of the targeted houses to have lost their presumed legal status of being civilian objects under international humanitarian law and for Israel's military forces to be able to justify attacks against any of the targeted houses by relying on the principle of military necessity.
- 65.** Given the above legal and factual analysis, Al Mezan and LPHR submit that Israel's military attacks against family houses in Gaza during their military operation between 7 July 2014 and 26 August 2014 are plainly unlawful due to violating the customary international humanitarian law principle of distinction and Article 53 of the Fourth Geneva Convention.
- 66.** Having made this clear determination, it is not necessary for the purpose of this complaint to go on to examine whether each Israeli military attack against a family house in Gaza during their military operation between 7 July 2014 and 26 August 2014 satisfied the test of proportionality. That being said, Al Mezan and LPHR submit that the presented significant initial evidence on the very large number of family members who were killed and injured in military attacks against family houses clearly indicates that a vast number of the attacks would additionally violate the principle of proportionality.
- 67.** The issue of whether a family house is a legitimate military target is unaffected by the issue of whether Israel has adhered to the obligation under customary international humanitarian law of providing effective advance warnings to civilians before attacking a target¹⁸. It should however be noted that issuing a warning does not absolve an attacking force of its obligations to spare civilians, including by taking all other necessary precautions to minimize civilian casualties and damage to civilian structures.

¹⁸ Customary IHL Rule 20, International Committee of the Red Cross; http://www.icrc.org/customary-ihl/eng/docs/v1_cha_chapter5_rule20

68. Furthermore, Al Mezan and LPHR have huge concerns about the efficacy of Israel's warnings of impending attacks with phone calls, text messages or so called “knocks on the roof” (dropping of non-impact or low-impact explosives on the intended target). As illuminated by the serious violation incidents documented in this complaint, the warnings that have been provided by Israel either don't provide sufficient time to flee before an attack; don't inform civilians where it is safe to flee to; and in the context of “knocks on the roof” can be lethal. Moreover, there are examples presented in this complaint where no warning has been provided to civilians before a military attack against a family home.
69. It is necessary for the purpose of this complaint to consider the significant issue of responsibility and reparation for any violation of international humanitarian law.
70. State responsibility is provided by international humanitarian law for violation of its provisions. It is sufficient to underscore here the twin principles of customary international humanitarian law that a state is responsible for violations of international humanitarian law attributable to it¹⁹, and that a state responsible for violations of international humanitarian law is required to make full reparation for the loss or injury caused.²⁰
71. Individual criminal responsibility is incurred for violations of fundamental humanitarian rules under both customary international law and treaties. They encompass war crimes, crimes against humanity and genocide.
72. War crimes are serious breaches of international humanitarian law that apply to armed conflicts and entail individual criminal responsibility under treaty or customary law. This category of crimes includes and/or overlaps with the grave breaches as defined in the four Geneva Conventions.
73. War crimes comprise crimes against protected persons (including wilful killing, wilfully causing great suffering or serious injury to body or health, and collective punishments); crimes against property (including extensive destruction of property not justified by military necessity and carried out unlawfully and wantonly); crimes relating to the use of prohibited methods and means of warfare (including directing an attack against civilians or civilian objects, launching an attack directed against legitimate targets if such attack causes excessive incidental civilian casualties or damage to the environment).
74. Al Mezan and LPHR submit that the presented significant initial evidence of the practice of the Israeli military to target family houses resulting in civilian loss of life and serious injury clearly indicates the commission of the grave breaches of “wilful killing... [and/or] wilfully causing great suffering or serious injury to body or health... [and/or] extensive destruction... of property, not justified by military necessity and carried out unlawfully and wantonly”, under article 147 of the Fourth Geneva Convention and article 8 (2) (a) of the Rome Statute of the International Criminal Court.

¹⁹ Customary IHL Rule 149, International Committee of the Red Cross; http://www.icrc.org/customary-ihl/eng/docs/v1_cha_chapter42_rule149

²⁰ Customary IHL Rule 150, International Committee of the Red Cross; http://www.icrc.org/customary-ihl/eng/docs/v1_cha_chapter42_rule149

75. Al Mezan and LPHR further submit that the presented significant initial evidence of the practice of the Israeli military to target family homes resulting in civilian loss of life and serious injury clearly indicates the commission of other serious violations of the laws and customs applicable in international armed conflict, within the established framework of international law, of “directing an attack against civilians or civilian objects... [and/or] launching an attack directed against legitimate targets if such attack causes excessive incidental civilian casualties or damage to the environment”, under article 8 (2) (b) the Rome Statute of the International Criminal Court.
76. Crimes against humanity are crimes that shock the conscience of humanity. Among them include murder, persecutions and other inhuman acts when they are part of a widespread or systematic attack against any civilian population.
77. Al Mezan and LPHR have a substantial concern that the presented significant initial evidence of the large-scale, deliberate and systematic targeting of family houses resulting in civilian loss of life and serious injury indicates the commission of acts of 'murder', and/or 'persecution', and/or 'other inhumane acts of a similar character intentionally causing great suffering, or serious injury to body or to mental or physical health', in a context which could amount to the commission of crimes against humanity.

International human rights law

78. Article 11 of the International Covenant on Economic, Social and Cultural Rights requires State parties to “recognize the right of everyone to an adequate standard of living for himself and his family, including adequate... housing”. As an occupying power, Israel has to protect the private property in the Gaza Strip and further to refrain from taking any action that would violate the right to adequate housing of the Palestinian people in the Gaza Strip.
79. Al Mezan and LPHR submit that the presented significant initial evidence of the vast destruction and damage caused to family houses by the conduct of the Israeli military to target family houses in Gaza during the military operation between 7 July 2014 and 26 August 2014 clearly indicates the commission of the gross, deliberate and systematic violation of the right to adequate housing of the Palestinian residents of these homes.
80. Al Mezan and LPHR further submit that the presented significant initial evidence of Palestinian loss of life or injuries within, or in the vicinity of, their family homes, as a result of the Israeli military targeting of family homes, clearly indicates the commission of a serious violation of the victim's inherent right to life where it resulted in death, as protected by Article 6 of the International Covenant on Civil and Political Rights, and to a serious violation of the right to physical integrity and the prohibition on cruel and inhuman treatment, as protected by Article 7 of the International Covenant on Civil and Political Rights.

Suggested Recommendations:

81. Given the presented significant initial evidence and legal analysis submitted in this complaint of the gross, deliberate and systematic violation of the right to adequate housing by Israel's military in Gaza during their military operation between 7 July 2014 and 26 August 2014, with accompanying serious violations to the right to life and physical integrity, Al Mezan and LPHR respectfully request that the United Nations Special Rapporteur on Adequate Housing and the United Nations Special Rapporteur on the OPT urgently takes the following steps:

i) Use our complaint submission as the basis to commence your own investigation into the serious violation incidents of the right to adequate housing and the right to life and physical integrity resulting from Israel's military attacks against family houses in Gaza during their military operation between 7 July 2014 and 26 August 2014;

ii) Liaise with the recently appointed UN Human Rights Council independent Commission of Inquiry concerning the significant legal and human rights issues raised by Israel's military attacks against family houses in Gaza during their military operation between 7 July 2014 and 26 August 2014;

iii) Communicate with Israel concerning their military attacks against family houses in Gaza during their military operation between 7 July 2014 and 26 August 2014 and to consider emphasising the following:

- Condemn the large-scale, deliberate and systematic targeting of family houses by the Israeli military as conduct amounting to the commission of serious violations of international humanitarian and human rights law;
- Urge Israel to allow and facilitate access for all necessary construction materials to enter Gaza so that reconstruction can take place for the vast number of people whose houses have been destroyed or damaged;
- Urge Israel to conduct timely and effective criminal investigations, to international standards of independence, impartiality, thoroughness and transparency, into each case where there is reason to suspect the commission of a violation of international humanitarian law, and that accountability and justice is secured for proven criminal wrongdoing;
- Urge Israel to revoke Amendment No. 8 of the Israeli Torts (State Liability) Law which impermissibly restricts the liability of the Israeli state;
- Urge Israel to remove the procedural, financial and judicial obstacles which prevent such cases from being determined on the merits through the Israeli legal system; including movement and access restrictions and the prohibitive 60-day statute of limitations.

iv) Publicise the findings of your investigation into these serious violation incidents which we suggest should include significant reference to the vital need for criminal investigations, accountability and state responsibility and reparations for all alleged serious violations of international humanitarian and human rights law. This is necessary to enable the victims of Israel's military operation in Gaza between 7 July 2014 and 26 August 2014 to obtain access to an effective remedy and justice, and furthermore to provide a robust deterrent against any horrific recurrence of unlawful military attacks against family homes with grave consequences for civilians.

82. Al Mezan and LPHR are very willing to effectively assist the United Nations Special Rapporteur on Adequate Housing and the United Nations Special Rapporteur on the OPT by providing further information on the serious violation incidents documented in this complaint. Al Mezan's director, Issam Younis, can be contacted directly by email at issam@mezan.org. LPHR's director, Tareq Shrourou, can be contacted directly by email at contact@lphr.org.uk.

83. Thank you for your careful consideration of this complaint.

Yours faithfully,

Tareq Shrourou
Director, Lawyers for Palestinian Human Rights

Issam Younis
Director, Al Mezan Center for Human Rights