

Antisemitism: A Persistent Threat to Human Rights

A Six-Month Review of Antisemitism's Global Impact following the UN's 'Historic' Report

April 2020

Summary

In October 2019, Dr. Ahmed Shaheed, the United Nations Special Rapporteur on Freedom of Religion or Belief, expressed alarm about a significant increase, since 2017, in reports of hostility, discrimination and violence motivated by antisemitism around the world.¹ This report surveys antisemitic incidents that have occurred in the six months since Dr. Shaheed presented his report on the subject of antisemitism to the UN General Assembly.

Alarming, antisemitic expression and violence appear to have persisted – and even increased – in a number of countries around the world between October and April 2020, notwithstanding efforts by governments and other stakeholders to implement Dr. Shaheed's recommendations. The cases and trends highlighted in this report reveal that antisemitism remains a phenomenon that impairs the security and the human rights of many Jewish individuals, including the right to manifest their religion, and that it also threatens the rights of members of other minority communities and democratic societies as a whole.

Since the emergence of the COVID-19 pandemic in early 2020, in many countries, conspiracy theories claiming that Jews or Israel engineered or are deliberately spreading the virus, as well as age-old antisemitic tropes associating Jews with disease, have been spread in traditional media and online. Occasionally, Jewish people, communities, and institutions have been subjected to antisemitic harassment and threats of violence; in a few cases, antisemitic rhetoric seems to have played an important role in motivating attempted violent attacks against sites and individuals, Jewish and non-Jewish alike.

In two statements in April 2020, Dr. Shaheed expressed alarm about rising antisemitic hate speech² and stigmatization, discrimination, and violence against members of religious minority communities including Jews during the COVID-19 pandemic.³ It is now imperative that governments, political leaders, social media companies, civil society and United Nations experts and officials devote more to meeting the challenge of antisemitism in the months ahead.

These recent antisemitic threats and displays are taking place during a time in which the ability of Jews – like adherents of all other faiths – to manifest their religion has been dramatically curtailed as governments around the world have put in place social distancing requirements and prohibitions on mass gatherings. The serious threat to public health and life posed by the pandemic is a legitimate justification for such restrictions. However, it is vital that public officials communicate with religious communities to ensure they are informed about the restrictions and their purpose and enforce them in a non-discriminatory manner. Moreover, for as long as this crisis persists, it is essential that law enforcement provide effective protection to Jewish communities, including by monitoring and enforcing hate crimes laws, in cooperation with those communities, and that officials promptly and publicly condemn and disavow antisemitic rhetoric and conspiracy theories occurring online and offline.

I. Background

On October 17, 2019, Dr. Ahmed Shaheed, the UN Special Rapporteur on Freedom of Religion or Belief, presented a report to the UN General Assembly's Third Committee identifying rising global antisemitism as a threat to the human rights of Jews and non-Jews and as a phenomenon that, when left unaddressed, is "toxic to democracy." The 193-member General Assembly warmly welcomed Dr. Shaheed's report in a resolution adopted by consensus.⁴

Dr. Shaheed's unprecedented report to the UN General Assembly, the first-ever UN human rights report dedicated entirely to the issue of antisemitism, was particularly notable for its global scope – expressing concern that antisemitic attitudes appeared to be prevalent in both countries with significant Jewish populations and those with no Jewish inhabitants alike – and its recognition of the classic and contemporary ways in which antisemitism is manifested, as set out in the International Holocaust Remembrance Alliance (IHRA) Working Definition of Antisemitism. Dr. Shaheed concluded that antisemitism not only denies Jewish individuals and communities worldwide the ability to enjoy their human rights but also "threatens the rights of all people in societies in which this insidious hatred is unaddressed."⁵

Dr. Shaheed's recommendations, directed to governments, social media companies, the United Nations system, and others, call on all actors to respond to and combat antisemitism in ways consistent with their human rights obligations and to enhance their engagement and collaboration with affected Jewish communities to understand and address their concerns.

II. Antisemitic Incidents, October 2019-April 2020

The following is a review of emblematic recent cases of antisemitic violence, discrimination, and rhetoric worldwide since October 17, 2019. It makes it clear that antisemitism remains a pernicious threat that is global in scope.

While official reports have yet to be published in a number of countries, the marked increase in antisemitic incidents in 2017 and 2018 that so alarmed Dr. Shaheed persisted in 2019, according to authorities and non-governmental organizations that monitor and report on antisemitism in several key cities and countries.

- **Globally**, the Kantor Center at Tel Aviv University and European Jewish Congress documented an 18% increase in violent antisemitic attacks from 2018 to 2019.⁶
- In the **United States**, several major cities documented a rise in antisemitic hate crimes in 2019, with New York City experiencing an estimated 26% increase from 2018 to 2019.⁷
- Police in **Germany** documented an increase in reports in violent antisemitic acts from 2018 to 2019 as well,⁸ including a shooting at the Halle synagogue on October 9.
- Similarly, monitors in the **United Kingdom** and **Canada** documented a record number of antisemitic incidents in 2019, reflecting a 7% increase from 2018 in the U.K. and an 8% increase in Canada.⁹

It is important to note that these data sets must be viewed in the context of two significant impediments to assessing the state of global antisemitism about which Dr. Shaheed expressed concern in his report: first, in many States, officials do not attempt to monitor antisemitic incidents and non-governmental sources are unable to do so, or to do so comprehensively; and second, in all countries, underreporting of antisemitic incidents by victims is a very serious problem.¹⁰ Dr. Shaheed's report noted with concern that many Jewish individuals do not feel comfortable reporting their experiences to law enforcement owing to the apparent normalization of incidents, distrust in the criminal justice system, lack of resources or fear that reporting a hate crime would reveal their Jewish identity to the public.¹¹ Evidence including a survey carried out by AJC in September-October 2019 demonstrated that in 75% of cases, American Jews who had experienced an antisemitic attack or remark in the past five years had not reported it to the authorities;¹² a finding comparable to that reached by a similar survey carried out by the European Union Agency for Fundamental Rights (FRA) in 12 EU member states in 2018.¹³

Emblematic Cases: Violent Antisemitic Attacks and Threats

The most violent antisemitic attacks to have occurred since the publication of Dr. Shaheed's report took place in the **United States**.

- On November 1, 2019, the FBI arrested a man with white supremacist beliefs who had expressed antisemitic hatred on Facebook for attempting to bomb a synagogue in Pueblo, Colorado.¹⁴
- On December 28, 2019, a man whose online activity revealed antisemitic motivations carried out a machete attack on the home of a rabbi hosting a Hanukkah celebration in Monsey, New York, wounding five guests, including one who later died. The attacker was prevented by congregants from continuing the attack in an adjacent synagogue.¹⁵
- On December 10, 2019, two individuals, one of whom was a member of an extremist group who had previously posted antisemitic comments on Facebook, carried out an armed attack on a kosher supermarket in Jersey City, New Jersey, killing three people in the supermarket and a policeman.¹⁶
- In December 2019, Orthodox Jewish residents of the Brooklyn, New York, neighborhoods of Williamsburg, Crown Heights, and Borough Park experienced an alarming series of apparently antisemitic assaults.¹⁷
- More recently, on April 2, 2020, a homemade incendiary device was discovered at a Jewish assisted living residence in Longmeadow, Massachusetts, after a white supremacist organization reportedly identified the facility on social media as one of two possible locations for committing a mass killing.¹⁸

Jews have faced physical attacks and threats of violence in other countries as well, including:

- **Germany**, where individuals were attacked in the Pankow district in Berlin by assailants using antisemitic language on multiple occasions in the last months of 2019.¹⁹ These incidents came in the wake of an attack on a synagogue in Halle on October 9, the Jewish High Holy Day of Yom Kippur, by a man armed with a gun who shot nearby individuals when he was unable to enter it, killing two and injuring two.²⁰

- **The United Kingdom**, where a rabbi was physically assaulted by perpetrators shouting antisemitic slurs in December.²¹
- **France**, where an Israeli student was beaten on the subway after speaking in Hebrew on his phone in December.²²
- **Italy**, where after Senator Liliana Serge, an 89 year-old Holocaust survivor, called for parliament to establish a commission to combat racism and religious intolerance in October, she received antisemitic death threats from far-right extremists that necessitated that she be placed under police protection.²³

Jewish religious and cultural sites have also been subjected to attacks since the publication of Dr. Shaheed's report. In **Denmark**, more than 80 tombstones in a Jewish cemetery were desecrated on the anniversary of Kristallnacht in November 2019, allegedly by a leader of a neo-Nazi group.²⁴ Jewish sites in **Sweden** were similarly defaced on the same day.²⁵ Similarly, more than 100 tombs in a Jewish cemetery in Westhoffen, **France**, were defaced with swastikas and antisemitic messages in December.²⁶

Antisemitic Rhetoric, Online and Offline, October 2019-April 2020

Since the publication of Dr. Shaheed's report, antisemitic expression has persisted worldwide, at public events and in traditional media formats, as well as online. At the Aalst Carnival, an annual costume parade in **Belgium** which took place this year on February 23, a number of participants and observers wore costumes stigmatizing Jews, including a group dressed as Ultra-Orthodox Jews with insect bodies and legs.²⁷ This followed the removal of the carnival from UNESCO's Representative List of the Intangible Cultural Heritage of Humanity by its Intergovernmental Committee for the Safeguarding of Cultural Heritage in December 2019 for "recurring repetition of racist and antisemitic representations."²⁸ In **Turkey**, two groups affiliated with an Islamist opposition party placed posters in bus stops in the city of Konya featuring images of blood-splattered crosses and Stars of David accompanied by a Qur'anic verse urging Muslims "not to take Jews and Christians as friends."²⁹

Similarly, the past six months have seen antisemitic expression remain persistent on social media. For example, in **Germany**, a far-right parliamentarian invoked an antisemitic trope in a Twitter post criticizing the German government's decision to give an award to a popular musician who had criticized his party.³⁰ In the **United States**, in November, a fundamentalist Christian pastor from Florida posted videos on the website TruNews and on YouTube claiming impeachment proceedings in the U.S. Congress against the President were a "Jew coup" and that Jews would carry out mass killings of Christians if the effort succeeded.³¹ YouTube removed the video from its site,³² and permanently banned the TruNews channel in February 2020.³³ In **Italy**, an artist known for his work on Christian themes and at Catholic places of worship produced a painting of a notorious blood libel from the 1400s, depicting Jews carrying out the ritual murder and collection of the blood of a Christian child, and posted pictures of it on Facebook in March. Thereafter, an influential Italian bishop denounced the painting.³⁴

III. Antisemitism in the Context of the COVID-19 Pandemic

As Dr. Shaheed noted in an April 17 statement,³⁵ there has been an apparently dramatic rise in antisemitic hate speech related to the COVID-19 pandemic in the first four months of 2020.

The following section presents illustrative examples, documented by antisemitism monitoring organizations and journalists around the world, demonstrating the geographic breadth of the antisemitic stigmatization and conspiracy theories being shared today. The details of these incidents and additional cases are presented in the [Annex](#) that accompanies this report.³⁶ While they are presented according to the country in which they are presumed to have originated, their similarity and mode of transmission also makes it clear that online antisemitism is having a significant transnational effect and impact.

The IHRA Working Definition of Antisemitism, which Dr. Shaheed reproduced in full in his report, provides helpful guidance on how to recognize antisemitism by providing a list of illustrative examples of the ways in which it is manifested. The incidents detailed in this report reflect several of the many different forms of antisemitism outlined therein, including:

- Charging Jews with conspiring to harm humanity or blaming Jews for “why things go wrong”;
- Making mendacious, dehumanizing, demonizing or stereotypical allegations about Jews as such or about the power of Jews as a collective, such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions;
- Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews;
- Targeting the State of Israel, conceived as a Jewish collectivity;
- Using the symbols and images associated with classic antisemitism (e.g. claims of Jews killing Jesus or “blood libel”) to characterize Israel or Israelis;
- Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust).³⁷

These and other antisemitic tropes have characterized the antisemitic hate speech that has proliferated online and offline during the COVID-19 pandemic. In a number of cases, public figures, including religious leaders and politicians, have spread antisemitic claims that Jews developed and deliberately spread the coronavirus, or that its spread is an Israeli plot. Similarly, antisemitic commentary has flourished on social media platforms (such as Facebook, Twitter, YouTube, Telegram, Gab, and 4chan) in which users – frequently using anonymized accounts – have promoted conspiracy theories that Jews or the government of Israel manufactured the coronavirus for profit or to exert control over global affairs for the benefit of Jews, or that have blamed Jewish communities for the spread of the coronavirus using classic antisemitic rhetoric, reminiscent of age-old tropes blaming Jews for spreading disease.³⁸ There has also been a noted rise in antisemitic “Zoombombing,” wherein uninvited people enter and interrupt meetings on Zoom, a video-teleconferencing platform, with antisemitic messages or imagery and occasionally with violent, threatening language targeting individual participants.

North America

- **In Canada**, a Toronto-area synagogue’s prayer service was “Zoombombed” by a number of individuals who yelled antisemitic insults at participants and used their screens to show pornography.³⁹

- In the **United States**:
 - A neo-Nazi website posted articles suggesting that the coronavirus was created by Israel as a weapon;⁴⁰
 - The fundamentalist Christian website TruNews and the pastor who founded it said in a video that God was punishing Jews by allowing the coronavirus to spread at synagogues and posted numerous articles blaming Jews for spreading it;⁴¹
 - The former head of the Ku Klux Klan, in posts on Twitter, has repeatedly blamed Israel, “Zionists,” and financial institutions controlled by Jews for deliberately spreading the virus;⁴²
 - A high-profile white supremacist and frequent candidate for public office wrote on Telegram that Israel and Jews had manufactured and spread the virus to demonstrate their control of the world and urged people to prevent them from succeeding.⁴³
 - There have been several instances in which Jewish religious services and religious instruction conducted online on Zoom have been interrupted with antisemitic harassment.⁴⁴

Latin America

- In **Brazil**, a cartoon produced by a well-known satirist and published on platforms including Twitter depicts an Israeli soldier deliberately locking Palestinians into a coronavirus-ridden Gaza.⁴⁵
- In **Venezuela**, Aporrea, a left-leaning news website, has published articles claiming that coronavirus is a method of biological warfare created by the U.S. and Israel.⁴⁶

Eastern Europe

- In **Bulgaria**, a newspaper article entitled “Coronavirus Bio-attack Carried out by the Zio-Anglo-American Axis,” suggested only Israel would emerge unscathed from the pandemic and said it would become clear “who started it from their safe haven.”⁴⁷
- In **Russia**, an antisemitic video entitled “Coronavirus for goyim” was posted on the Russian social network Vkontakte (VK) and then widely shared on other platforms, including Facebook, in other countries.⁴⁸

Western Europe

- **In France**:
 - A Jewish former Minister of Health has been subjected to an antisemitic campaign on social media; a YouTube video viewed 170,000 times before it was deleted accused her and her husband, who is also Jewish, of withholding chloroquine, rumored to be an effective treatment for victims of the virus, from the French public for financial gain; images with her face superimposed over the antisemitic “happy merchant” meme or depicting her poisoning a well, a classic antisemitic stereotype, have been widely shared on social media;⁴⁹
 - A far-right provocateur and Holocaust denier said in a video on YouTube viewed more than 400,000 times that Jews are using the pandemic as an opportunity for financial gain and to weaken the French nation.⁵⁰
- In **Germany**, a meeting held by the Embassy of Israel in Berlin on the eve of Holocaust Memorial Day was Zoombombed by a group of people who posted pictures of Hitler and made antisemitic and anti-Israel comments.⁵¹

- In **Spain**, a far-left Basque political party has characterized the pandemic as a tool of a Zionist elite seeking to dominate the world.⁵²
- In **Switzerland**, a Holocaust denier has claimed that the coronavirus originated in a Chinese laboratory financed by Jewish financier and philanthropist George Soros.⁵³

The Middle East and North Africa

- In **Algeria**, a news outlet has claimed the coronavirus was manufactured by Zionists as evidenced by the speed with which Israel was reported to be developing a vaccine and suggested the Jewish former French health minister who has been the subject of antisemitic conspiracy theories on social media in France was connected to the company developing it.⁵⁴
- In **Iran**:
 - Following a March 23 speech in which Iran’s Supreme Leader Khamenei suggested the U.S. had manufactured the coronavirus and that “demons” were assisting the enemies of Iran, the online magazine Negar, which is produced and published by the Supreme Leader’s official website, and the Telegram channel of the Cyber Division of Iran’s Islamic Revolutionary Guard Corps (IRGC) posted explanatory remarks by a cleric who said that Jews and Zionists have long collaborated with the devil and supernatural forces, and that Israeli intelligence uses this to its advantage.⁵⁵
 - Iran’s Ofogh TV featured a discussion about the theory that COVID-19 is a biological weapon, during which Dr. Ali Karami, a lecturer in medicine, said that “the Americans and the Zionists” had sequenced the genome of Iranians in order to develop weapons that would be particularly effective against them and that Israel had long been using such “ethnic weapons” against Palestinians.⁵⁶
 - Iran’s English-language news network PressTV has featured experts and published articles saying that Zionists from the U.S. or Israel manufactured the coronavirus and deliberately spread it in Iran as a form of biological warfare, and its Spanish-language news network HispanTV has aired similar content.⁵⁷
 - The Art Bureau, in collaboration with the Health Ministry and Culture Ministry, organized an international cartoon contest with the theme of defeating coronavirus and featured several submissions that contained antisemitic themes on a website for the contest, including one depicting Israeli scientists spreading the virus and others blaming the US and Jews for the spread of the virus.⁵⁸
- In **Iraq**, a televised news report said the coronavirus was manufactured by Jews to reduce the world’s population.⁵⁹
- In **Jordan**, a news article claimed that the coronavirus epidemic was a consequence of capitalism and Judaism, which is a cancer that has harmed humanity from the dawn of its civilized history, “because it regards non-Jews as inferior creatures who are detested by God and can be killed with impunity.”⁶⁰
- In **Lebanon**, a program on the Hezbollah-affiliated Al-Manar satellite television station featured a professor from an American university analogizing Western concern about the coronavirus to concern about the Holocaust and trivializing the gravity of the Holocaust in doing so.⁶¹
- In **Pakistan**, a widely-shared post published on Facebook and Twitter featured an image of the Israeli flag alongside an Urdu-language caption claiming that the coronavirus was created by Israel and that Israel had developed a cure.⁶²
- The **Palestinian Authority** has published a number of antisemitic cartoons and news articles:

- A cartoon published in the official *Al-Hayat Al-Jadida* daily depicts an Israeli tank as a coronavirus particle aiming at a Palestinian man holding an infant.⁶³
- Another cartoon published in the official *Al-Hayat Al-Jadida* daily depicts an Israeli soldier as a coronavirus particle leading a Palestinian prisoner.⁶⁴
- An article in the daily *Al-Quds* speculated that the U.S. and Israel spread the coronavirus as a form of biological warfare against China and Iran.⁶⁵
- In **Saudi Arabia**, the daily paper *Al-Watan* published an article claiming that the coronavirus was developed by American and Israeli drug companies to increase their profits.⁶⁶
- In **Turkey**:
 - The head of an Islamist political party said that the coronavirus serves Zionism's goal of reducing the world's population,⁶⁷
 - An expert on a TV news program implied that since Israel had said it was developing a vaccine for the coronavirus, it must have been responsible for its spread.⁶⁸
- In **Yemen**, an academic said on a TV program that the U.S. and Jews were spreading the coronavirus and that the namesake of the Houthi movement, Hussein Badreddin Al Houthi, had predicted that the Jews, Israel and America would create pandemics to shut down the holy mosques in Mecca and Medina.⁶⁹

Violence and discrimination inspired by antisemitic rhetoric during the COVID-19 pandemic

On several recent occasions, cases have been reported in which people have attempted to commit violent attacks against Jews, Jewish sites, and the broader public, or to discriminate against visibly Jewish people by denying them services, in circumstances that suggest that their actions resulted from a belief that Jews are spreading the coronavirus.

- In the **United States**:
 - On March 23 online extremist groups were encouraging members who became infected with COVID-19 to spread the virus to police and Jews, according to a warning issued by the FBI's New York office to local law enforcement authorities.⁷⁰
 - Several cases in which individuals made violent threats against Jews on social media platforms or in which individuals who had posted antisemitic rhetoric online were suspected of planning to commit violence against members of visibly Jewish communities, a Jewish assisted living facility, and a hospital, including in New York,⁷¹ New Jersey,⁷² Massachusetts,⁷³ and Missouri, and in which law enforcement authorities have already intervened.⁷⁴
 - A number of Jewish religious sites were defaced with swastikas and other antisemitic graffiti in late March and early April 2020, including a Chabad Center in Brookline, Massachusetts and synagogues in Huntsville, Alabama; Los Angeles, California; Sarasota, Florida; and Rockville, Maryland.⁷⁵
 - Cases have been reported in which Jewish individuals have been discriminated against by employees of private businesses who reportedly refused to serve them out of concern that Jews were spreading the coronavirus.⁷⁶
- In **Russia**, a synagogue in the northwestern city of Arkhangelsk was subjected to an arson attack on April 13.⁷⁷

The Impact of Antisemitism and COVID-19 Emergency Measures on the Ability of Jews to Exercise the Right to Freedom of Religion or Belief

The incidents recounted above demonstrate that antisemitism remains not only a serious societal challenge, but a serious human rights problem as well. As Dr. Shaheed's report recognizes, in extreme cases, antisemitic rhetoric can pose a threat to the right to life of Jews; more broadly, though, it can create a climate of fear in which Jews – particularly those who are openly or visibly religious – are effectively prevented from being able to manifest their religion or belief or exercise other rights. Online antisemitism has a heightened impact in the COVID-19 era, in which the right to freedom of religion or belief has been restricted for Jews and non-Jews alike around the world. Practices like Zoombombing, for example, can cause trauma and dissuade individuals from engaging in the limited avenues that exist today for them to exercise the right to manifest their religion.

Moreover, since the onset of the COVID-19 pandemic, in countries around the world, restrictions on movement and assembly put in place to curb the spread of the coronavirus have dramatically limited individuals' ability to manifest their religion in community with others and to receive and conduct religious education. The ability of religious people to hold weddings, funerals, and other religious celebrations and engage in other religious practices has been dramatically restricted.

The right to freedom of religion or belief, as set out in international human rights instruments,⁷⁸ is not absolute; it can be restricted to protect public health and the rights of others, including their right to life, and subject to other conditions. But such restrictions must be clearly set out in law, necessary, and proportionate in order to be justifiable, and even where they are justifiable, it is impermissible to enforce them in a discriminatory manner against religious institutions generally or against a particular religious group.⁷⁹ Indeed, reasonable accommodations should be made to general laws in order to allow individuals to manifest their religion or belief where doing so does not give rise to a disproportionate or undue burden or cause harm to the rights of others or to public health or safety.⁸⁰

In some countries, authorities have taken emergency measures in response to the pandemic that actively violate Jewish religious practices, for example, by requiring the bodies of victims of the virus to be cremated even where this practice is inconsistent with their religious beliefs. For example, in the **United Kingdom**,⁸¹ **Romania**,⁸² and **Argentina**,⁸³ authorities reportedly considered or adopted measures requiring that COVID-19 victims' bodies be cremated in some circumstances. Following objections from Jewish and Muslim communities, however, these measures have been modified or are reportedly in the process of being amended.

Progress in Implementation of Dr. Shaheed's Recommendations

Since October 2019, several governments have taken important steps to combat antisemitism in line with the recommendations set out in Dr. Shaheed's report on antisemitism to the UN General Assembly. One particularly notable example is that an increasing number of States have recognized the International Holocaust Remembrance Alliance (IHRA) Working Definition of Antisemitism, which Dr. Shaheed recognized as a key source of "valuable guidance for identifying antisemitism in its various forms," and which he recommended that States "adopt...for use in education and awareness-raising and for

monitoring and responding to manifestations of antisemitism.”⁸⁴ Since October 2019, Cyprus, Italy, Sweden, Greece and Uruguay have all adopted the Working Definition, bringing the total number of States that have done so to 25.⁸⁵

Another of Dr. Shaheed’s recommendations was that governments should appoint senior officials to oversee efforts to monitor, document, and combat antisemitism, and that the United Nations system should do the same. States including Italy and Romania have taken this step since October 2019.⁸⁶ Similarly, in early 2020, UN Secretary-General Antonio Guterres appointed a senior focal point to enhance the UN’s system-wide response to antisemitism and related Jewish concerns.⁸⁷

Dr. Shaheed also recommended that governments take a variety of actions to prevent, prohibit and punish antisemitic hate crimes and hate speech. For example, he called on them to enact and enforce hate crime legislation recognizing antisemitism as a prohibited bias motivation and to invest in preventive security measures to deter antisemitic hate crimes.⁸⁸ Dr. Shaheed also called on governments to take a “robust approach” to combatting hate speech, but within the framework of international human rights law, which calls on governments to prohibit speech where it amounts to “advocacy of...religious hatred that constitutes incitement to hostility, discrimination or violence”⁸⁹ and to take necessary actions to ensure that people are able to enjoy their right to have and to manifest their religion or belief.⁹⁰ However, it also requires that governments protect the right to freedom of opinion and expression, and allows them to limit it only to the extent necessary to protect the rights of others or achieve other legitimate aims.⁹¹ UN guidance documents on this issue call on governments to combat antisemitic and other hate speech primarily through counter-speech and education, and to use criminal and other punitive measures only in very serious cases and as a last resort.⁹² Dr. Shaheed’s report recalls these guidance documents and emphasizes that “antisemitic incidents require prompt, unequivocal responses from leaders,” and calls on them to “promptly, clearly and consistently reject manifestations of antisemitism within their [political] parties and in public discourse.”⁹³ It also stresses that States “have an affirmative responsibility to address online antisemitism,” within the international human rights law framework.

In some of the countries mentioned above – **Canada, the United States, France, and Germany** among them – public officials have generally been quick to condemn antisemitic incidents and rhetoric;⁹⁴ law enforcement authorities have responded promptly to threats and acts of violence against Jewish people and institutions and attempted to monitor and report on antisemitic hate crimes; and national and local government authorities have affirmatively acted to establish dialogue and cooperation in reporting antisemitic incidents with Jewish communities.⁹⁵ For example, in December, following an attack on a Jewish cemetery, **France’s** Interior Minister announced that the government would create a national hate crimes bureau within the gendarmerie tasked with coordinating with judicial and police authorities in cases where crimes appeared to have been committed with antisemitic or other biased intent.⁹⁶

At the same time, in many countries outside North America and Europe, public officials have failed to condemn or otherwise take action to counter a significant number of the instances of antisemitic expression detailed above. Their inaction demonstrates the importance of continued attention in the UN and other multilateral forums to the global dimensions of antisemitic hate speech.

In contrast, despite the UN's checkered history on this issue,⁹⁷ recent actions by UN leaders, experts, and agencies demonstrate an increasing sensitivity to and concern about the dangers posed by antisemitism. For example, at an October 2019 UN event convened by the Holocaust and the United Nations Outreach Program and UNESCO, governments were urged to redouble their efforts to prevent antisemitism through education.⁹⁸ At the UN's January 2020 International Holocaust Remembrance Day program marking the 75th anniversary of the liberation of the Auschwitz concentration camp, the Secretary-General called on the world to address what he called a "global crisis of antisemitic hatred,"⁹⁹ and a group of nine independent UN human rights experts, including Dr. Shaheed, warned that States around the world were failing to sufficiently counter antisemitic violence, discrimination, and hostility within their societies.¹⁰⁰ During the COVID-19 pandemic, in addition to Dr. Shaheed's recent warnings about antisemitism, other actors have condemned reports of rising stigmatization, hate speech and hate crimes, including the UN Secretary-General, the High Representative for the United Nations Alliance of Civilizations, the Special Adviser on the Prevention of Genocide, and the High Commissioner for Human Rights.¹⁰¹

As demonstrated above, social media platforms are a critical aspect of the transnational spread of antisemitic messages, prior to and during the COVID-19 pandemic. In his 2019 report, Dr. Shaheed recommended that they "enforce terms of service and community rules that do not allow the dissemination of hate messages," by taking down posts, pages, and tweets and suspending accounts in cases where users have published particularly egregious antisemitic content online, and "report criminal antisemitic behavior online to relevant local law enforcement agencies, especially expression that constitutes incitement to discrimination, hostility, or violence."¹⁰²

Over the past six months, there have been a number of cases in which social media companies – including Facebook, Twitter, and YouTube – have taken steps to remove egregious antisemitic content and close their authors' accounts, and in which Apple has blocked Telegram channels encouraging intimidation of or violence against people on the basis of their religion.¹⁰³ On March 16, Facebook, Reddit, Google, LinkedIn, Microsoft, Twitter, and YouTube issued a joint statement on misinformation about COVID-19 on their platforms, noting that they are "jointly combating fraud and misinformation about the virus," though they have not announced similar action to combat hate speech, antisemitic or otherwise, during the pandemic.¹⁰⁴ Zoom has recently developed additional security and privacy features, posted additional guidance for users, and encouraged reporting of Zoombombing incidents.¹⁰⁵

However, a number of easily accessible online platforms – like Telegram, Gab, and 4Chan – have terms of service that generally allow antisemitic content unless it directly incites violence or otherwise violates state law,¹⁰⁶ and numerous social media platforms on the "Dark Web" which can only be accessed by specialized browsers have no content restrictions at all.¹⁰⁷ Platforms like Facebook, Instagram, and Twitter have reportedly acted inconsistently, slowly, and ineffectively in a number of cases in which users flagged antisemitic content on their platforms, for example by determining that the content did not violate community standards only to reverse the decision later, taking days to react to expressions of concern about antisemitic threats, and failing to react when the authors of banned accounts have created new accounts on their platforms and used them to disseminate the same antisemitic content.¹⁰⁸ Companies like Apple and Google have come under significant criticism for continuing to offer the Telegram app in their app stores despite numerous examples of cases in which content was posted on Telegram channels in violation of their policies.¹⁰⁹

Conclusions and Recommendations

The persistence of antisemitism, and its continued proliferation during the COVID-19 pandemic demonstrate that far more effort is needed to combat the pernicious threat of antisemitism, and that the need to do so remains urgent. Not only have Jewish communities continued to face deadly attacks, but antisemitic rhetoric has also continued to proliferate, espoused by speakers ranging from high-profile political and religious figures in traditional media outlets to white supremacists communicating online. Particularly alarmingly, antisemitic rhetoric appears to have increased as the COVID-19 pandemic has emerged in the first months of 2020, causing widespread fear and provoking an unprecedented increase in rhetoric scapegoating Jews for the global public health emergency. There are a number of cases in which antisemitic rhetoric has fueled discrimination, harassment, and even attempted mass violence; and the risk of additional such cases in the future is high.

In addition to his call for local authorities to provide Jewish individuals and communities with effective protection from antisemitic violence and discrimination, discussed above, Dr. Shaheed's call for international, regional, national and local actors – officials, social media companies, and others – to carry out greater education, monitoring of and condemnation of antisemitism remains essential.

- **Governments** worldwide should undertake – or enhance their existing efforts – to effectively monitor, document, and take effective action in response to antisemitic hate crimes and discrimination, especially by establishing collaborative arrangements with Jewish communities and civil society organizations to address the persistent challenge of underreporting. They should also ensure that all Jewish places of worship, educational, cultural sites, and individuals requiring protection receive it. All public officials should receive training on how to recognize antisemitism, with reference to the IHRA Working Definition of Antisemitism;
- **During the COVID-19 pandemic**, authorities should establish and maintain effective channels of communication with Jewish communities to transmit information about existing restrictions on public gatherings and social distancing requirements, seek to identify alternative arrangements in which religious activities can be conducted in ways that respect such restrictions, ensure that restrictions are not applied in a discriminatory manner, and regularly review restrictions to ensure that they remain necessary and proportionate;
- **Public officials, religious leaders, and others in a position of influence** should promptly and publicly condemn antisemitic incidents and rhetoric and take other actions to counter it that are consistent with human rights standards;
- **Social media platforms** should adopt terms of service and community standards prohibiting antisemitic speech, in line with the IHRA Working Definition of Antisemitism, strengthen their capacity to identify and promptly remove antisemitic content, and block users that repeatedly post such content. They should also acknowledge the danger of antisemitic stereotyping and conspiracies and similar hate speech and undertake individual and joint efforts to combat it, just as several platforms have already committed to combat misinformation about the coronavirus;

- **United Nations experts and officials** should express concern about the threat to human rights posed by antisemitic hate speech and condemn it, building on Dr. Shaheed’s April 17 warning about antisemitism during the COVID-19 pandemic. All UN personnel should receive training on how to recognize antisemitism, with reference to the IHRA Working Definition of Antisemitism. They should also be instructed to reach out to Jewish communities in the countries in which they work to understand their concerns, consistent with the UN Secretary-General’s Plan of Action on Hate Speech (2019)¹⁰ and the Secretary-General’s Call to Action for Human Rights (2020),¹¹
- **States at the United Nations** should continue to take actions reflecting multilateral concern about antisemitism and encouraging all governments to combat it in ways that are consistent with their human rights obligations, including by convening discussions about antisemitism at the General Assembly and convening best-practices sharing meetings of the “Istanbul Process” on combating religious intolerance.¹²

¹ *Antisemitism is toxic to democracy and must be addressed, says expert*, Office of the UN High Commissioner for Human Rights (OHCHR) (Oct. 17, 2020),

<https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=25160&LangID=E>.

² *Rise in antisemitic hatred during COVID-19 must be countered with tougher measures, says UN expert*, Office of the UN High Commissioner for Human Rights (OHCHR) (April 17, 2020),

<https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=25800&LangID=E>.

³ *UN expert warns against religious hatred and intolerance during COVID-19 outbreak*, OHCHR (April 22, 2020),

<https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=25814&LangID=E>.

⁴ G.A. Res. 74/145, ¶ 19 (Dec. 18, 2019).

⁵ Report of the UN Special Rapporteur on freedom of religion or belief, Ahmed Shaheed, *Elimination of all forms of religious intolerance*, U.N. Doc. A/74/358 (Sep. 20, 2019), <https://undocs.org/A/74/358>.

⁶ Kantor Center, Tel Aviv University, and European Jewish Congress, *Antisemitism Worldwide 2019 and the beginning of 2020: General Analysis – Main Findings (Draft)* (April 20, 2020). Available at http://www.kantorcenter.tau.ac.il/sites/default/files/Kantor%20Center%20Worldwide%20Antisemitism%20in%202019%20-%20Main%20findings_0.pdf. The report documents 456 cases of major violent attacks in 2019 compared to 387 in 2018, resulting in the deaths of seven Jews and non-Jews; attacks on 53 synagogues (12%) and 28 community centers and schools (6 percent); a 47% increase in life-endangering threats; and a 24% increase in attacks on private property.

⁷ Rob Frehse, *Anti-Semitic hate crimes rise in 2019, overall crime at record low, NYPD says*, CNN (Jan. 7, 2020),

<https://www.cnn.com/2020/01/07/us/new-york-crime-stats-anti-semitic-hate-crimes/index.html>. Other cities including Los Angeles and Chicago also reported experiencing rising levels of reported antisemitic hate crimes.

Nigel Chiwaya, *It’s not just New York: Anti-Jewish attacks are part of a wave of ‘more violent’ hate crimes*, NBC (Jan. 3, 2020), <https://www.nbcnews.com/news/us-news/anti-semitic-attacks-more-violent-hate-crimes-new-york-n1110036>.

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- ⁸ Frank Jansen, *Höchststand bei Straftaten von Judenhassern*, Der Tagesspiegel (Mar. 4, 2020), <https://www.tagesspiegel.de/politik/antisemitische-kriminalitaet-hoechststand-bei-straftaten-von-judenhassern/25608278.html>. The police registered 1839 antisemitic incidents nationwide in 2019. Kantor Center, Tel Aviv University, and European Jewish Congress, *Antisemitism Worldwide 2019 and the beginning of 2020: General Analysis – Main Findings (Draft)* (April 20, 2020). Available at http://www.kantorcenter.tau.ac.il/sites/default/files/Kantor%20Center%20Worldwide%20Antisemitism%20in%202019%20-%20Main%20findings_0.pdf.
- ⁹ Harriet Sherwood, *Antisemitic incidents hit new high in 2019, according to study*, The Guardian (Feb. 5, 2020), <https://www.theguardian.com/news/2020/feb/06/antisemitic-incidents-hit-new-high-in-2019-according-to-study>; B'nai Brith Canada, *Annual Audit of Antisemitic Incidents 2019*, 5 (2020), https://d3n8a8pro7vhm.cloudfront.net/bnaibrithcanada/pages/394/attachments/original/1587945855/B'nai_Brith_Canada_Audit_2019_FINAL.pdf?1587945855.
- ¹⁰ Report of the UN Special Rapporteur on freedom of religion or belief, Ahmed Shaheed, *Elimination of all forms of religious intolerance*, ¶¶ 46-47, U.N. Doc. A/74/358 (Sep. 20, 2019), <https://undocs.org/A/74/358>.
- ¹¹ *Ibid.* ¶ 47.
- ¹² *AJC Survey of American Jews on Antisemitism in America*, AJC (2019), <https://www.ajc.org/AntisemitismSurvey2019>.
- ¹³ European Union Agency for Fundamental Rights, *Experiences and perceptions of antisemitism: Second survey on discrimination and hate crimes against Jews in the EU*, 12 (2018). Available at https://fra.europa.eu/sites/default/files/fra_uploads/fra-2018-experiences-and-perceptions-of-antisemitism-survey_en.pdf (finding that 79 per cent of respondents who had experienced harassment in the five years preceding the survey had not reported abuse, primarily because they believed that nothing would change if they did).
- ¹⁴ Julie Turkewitz, *White Supremacist Plotted to Bomb Colorado Synagogue, F.B.I. Says*, New York Times (Nov. 4, 2019), <https://www.nytimes.com/2019/11/04/us/pueblo-colorado-synagogue-richard-holzer.html>.
- ¹⁵ On December 28, 2019, Grafton Thomas invaded the home of Rabbi Chaim Rottenberg and began stabbing guests who were there to celebrate the seventh night of Hanukkah. Rebecca Liebson et al., *Intruder Screamed 'I'll Get You' in Attack on Jews at Rabbi's Home*, New York Times (Dec. 29, 2019), <https://www.nytimes.com/2019/12/29/nyregion/monsey-new-york-stabbing.html>. Five guests were wounded, one of whom ultimately died in March. Azi Paybarah, *Rabbi Dies Three Months After Hanukkah Night Attack*, New York Times (Mar. 30, 2020), <https://www.nytimes.com/2020/03/30/nyregion/rabbi-monsey-attack.html>. It was reported that, following the attack, Thomas also attempted and was prevented from entering a synagogue next door. Rebecca Liebson et al., *5 Wounded in Stabbing at Rabbi's House in N.Y. Suburb*, New York Times (Dec. 28, 2019), <https://www.nytimes.com/2019/12/28/nyregion/monsey-synagogue-stabbing-anti-semitic.html>. Thomas kept journals which referenced Jews and his internet search history included the question “why did Hitler hate the Jews,” “German Jewish Temples near me”, and “prominent companies founded by Jews in America. *Monsey stabbing: Journals of attacker 'referenced Jews'*, BBC News (Dec. 30, 2019), <https://www.bbc.com/news/world-us-canada-50952441>.
- ¹⁶ On December 10, 2019, David N. Anderson and Francine Graham attacked the JC Kosher Supermarket in Jersey City, New Jersey, which resulted in their deaths, as well as the death of three persons inside the store and a Jersey City police officer. Following the incident, it was reported that Anderson had been linked to the Black Hebrew Israelite movement, which consists of many separatist groups, of which 144 have been designated as hate groups by the Southern Poverty Law Center. *Deadly Attack in New Jersey – Possible Link to Black Separatist Movement*, Southern Poverty Law Center, <https://www.splcenter.org/deadly-attack-new-jersey-possible-link-black-separatist-movement>. The Mayor of Jersey City reported that Anderson’s Facebook posts expressed “favorable sentiment” towards antisemitic groups. Michael Gold and Ali Watkins, *Suspect in Jersey City Linked to Black Hebrew Israelite Group*, New York Times (Dec. 11, 2019), <https://www.nytimes.com/2019/12/11/nyregion/jersey-city-shooting.html>.
- ¹⁷ Shayna Jacobs, *Acts of anti-Semitism are on the rise in New York and elsewhere, leaving Jewish community rattled*, Washington Post (Dec. 29, 2019), https://www.washingtonpost.com/national-security/acts-of-anti-semitism-are-on-the-rise-in-new-york-and-elsewhere-leaving-jewish-community-rattled/2019/12/29/f8c20578-2a7e-11ea-bcb3-ac6482c4a92f_story.html; Andrea Salcedo and Sean Piccoli, *N.Y.P.D. Steps Up Patrols After Reports of 8 Anti-Semitic Incidents*, New York Times (Dec. 27, 2019), <https://www.nytimes.com/2019/12/27/nyregion/brooklyn-anti-semitic-attack.html>; *13 and Counting: NYPD Probing New Year's Day Attack on Young Jewish Man in Williamsburg*, CBS New York (Jan. 1, 2020), <https://newyork.cbslocal.com/2020/01/01/brooklyn-anti-semitic-hate-crimes-jewish-men-attacked-williamsburg-crown-heights/>; Ari Feldman, *Six Nights of Hanukkah, Seven Anti-Semitic Incidents in New York City*, The Forward (Dec. 27, 2019), <https://forward.com/news/national/437346/anti-semitic-attacks-nyc-brooklyn/>.

¹⁸ Press Release, U.S. Dep't of Justice, East Longmeadow Man Charged with Attempted Arson at Longmeadow Assisted Living Residential Facility (Apr. 15, 2020), <https://www.justice.gov/usao-ma/pr/east-longmeadow-man-charged-attempted-arson-longmeadow-assisted-living-residential>. Reportedly, social media users referring to the facility as “that jew nursing home in longmeadow massachusetts,” and designated April 3, 2020 as “jew killing day.” On April 15, police arrested John Michael Rathbun and charged him with two counts of attempted arson. Rathbun has denied having any involvement in white supremacist groups. Christopher Mathlas, *Man Arrested In Alleged White Supremacist Plot To Burn Down Jewish Nursing Home*, Huffington Post (Apr. 16, 2020), https://www.huffpost.com/entry/john-michael-rathbun-arrested-jewish-nursing-home-arson-massachusetts_n_5e988e67c5b6ead1400972ee. Michael Levenson, *Man Charged With Trying to Blow Up Jewish Assisted-Living Home*, New York Times (Apr. 16, 2020), <https://www.nytimes.com/2020/04/16/us/massachusetts-bomb-jewish-nursing-home.html?login=smartlock&auth=login-smartlock>.

¹⁹ On October 28, a 70 year old Jewish man was verbally attacked and physically assaulted by a man using antisemitic insults in the Pankow district in Berlin, Germany. Benjamin Weinthal, *70-year-old Jewish man in Berlin assaulted in violent antisemitic attack*, The Jerusalem Post (Oct. 30, 2019), <https://www.jpost.com/diaspora/70-year-old-jewish-man-in-berlin-assaulted-in-violent-antisemitic-attack-606262>. On November 18, a 76 year old man was assaulted by a teenager in the same neighborhood who called him a Jew during the attack. Toby Axelrod, *Elderly man beaten by teen in anti-Semitic attack in Berlin, police say*, The Times of Israel (Nov. 20, 2019), <https://www.timesofisrael.com/elderly-man-beaten-by-teen-in-anti-semitic-attack-in-berlin-police-say/>.

²⁰ After failing to enter the synagogue, Stephan Balliet, 27, armed with a sub-machine gun and explosives, killed two civilians nearby and injured two others. Balliet live-streamed the attack on the gaming website Twitch, during which he said that Jews were the cause of the world’s problems. In his manifesto, he stated, “Kill as many anti-Whites as possible, Jews preferred.” Rick Noack, Luisa Beck and Loveday Morris, *Gunman live-streamed attack outside German synagogue that left two dead*, The Washington Post (Oct. 9, 2019), https://www.washingtonpost.com/world/shooting-near-synagogue-in-germany-leaves-at-least-two-people-dead-police-say/2019/10/09/08214514-ea89-11e9-9306-47cb0324fd44_story.html.

²¹ On December 29, a rabbi who was visiting London was physically assaulted by teenagers while walking through the Stamford Hill neighborhood. The two teens reportedly shouted “Kill Jews” and “F*** Jews” during the attack. Rosa Doherty, *Senior Rabbi ‘beaten up in totally unprovoked attack’ in Stamford Hill*, The Jewish Chronicle (Dec. 1, 2019), <https://www.thejc.com/news/uk-news/senior-rabbi-attacked-in-stamford-hill-1.493749>.

²² JTA and Marcy Oster, *Israeli Student Beaten on Paris Metro Train After He Was Heard Speaking Hebrew*, Haaretz (Dec. 10, 2019), <https://www.haaretz.com/world-news/europe/israeli-student-beaten-on-paris-metro-train-after-he-was-heard-speaking-hebrew-1.8255281>.

²³ *Italy Holocaust survivor Liliana Serge under guard amid death threats*, BBC (Nov. 7, 2019), <https://www.bbc.com/news/world-europe-50329597>.

²⁴ On November 13, two men, including Jacob Vullum Andersen, a leader of the neo-Nazi group the Nordic Resistance Movement, were arrested for the cemetery vandalism and charged with gross vandalism and a hate crime offence. *Neo-Nazi held in Denmark over Jewish cemetery attack*, BBC (Nov. 14, 2019), <https://www.bbc.com/news/world-europe-50417187>.

²⁵ Cnaan Liphshiz, *On Kristallnacht anniversary, yellow stars placed at Jewish sites in Scandinavia*, The Times of Israel (Nov. 11, 2019), <https://www.timesofisrael.com/on-kristallnacht-anniversary-yellow-stars-appear-on-jewish-sites-in-scandinavia/>.

²⁶ *France Creates Anti-hate Crime Office Amid anti-Semitic Wave*, Haaretz (Dec. 4, 2019), <https://www.haaretz.com/world-news/europe/france-creates-anti-hate-crime-office-amid-anti-semitic-wave-1.8223020>.

²⁷ The Prime Minister of Belgium, Sophie Wilmes, condemned the antisemitic display, saying “these actions damage our values and the reputation of our country,” but other officials, including the mayor of Aalst, continued to deny that the costumes were antisemitic in the context of the carnival. Cnaan Liphshiz, *Anti-Semitic Belgium parade features costumes of Jews with insect bodies*, The Times of Israel (Feb. 23, 2020), <https://www.timesofisrael.com/anti-semitic-belgium-parade-features-costumes-of-jews-with-insect-bodies/>; Cnaan Liphshiz, *Belgian PM says Jewish caricatures at anti-Semitic parade ‘damage’ the country*, The Times of Israel (Feb. 24, 2020), <https://www.timesofisrael.com/belgian-pm-says-jewish-caricatures-at-anti-semitic-parade-damage-the-country/>.

²⁸ UNESCO’s intergovernmental committee for the safeguarding of intangible cultural heritage said it was withdrawing the carnival “over recurring repetition of racist and antisemitic representations” at the event. *UNESCO*

removes Belgium carnival with anti-Semitic float from heritage list, Jewish News Syndicate (Dec. 16, 2019), <https://www.jns.org/unesco-removes-belgium-carnival-with-anti-semitic-float-from-heritage-list/>.

²⁹ Uzay Bulut, *Turkey: The worst antisemitic incidents of 2019*, Ahval News (Jan. 24, 2020), <https://ahvalnews.com/anti-semitism/turkey-worst-antisemitic-incidents-2019>.

³⁰ On October 31, Stephan Bradner, a parliamentarian for the far-right Alternative for Germany party posted a tweet aimed at the German musician Udo Lindenberg, who had recently been awarded the Federal Cross of Merit by the German government, calling the award a “Judas wage,” for Lindenberg’s criticism of the Alternative for Germany party. Bradner was subsequently removed from the post of chairman of the legal committee in the Bundestag with the support of all parties except his own. *German Far-Right Leader Stirs Controversy With Antisemitic ‘Judas’ Tweet Aimed at Popular Musician*, The Allgemeiner (Nov. 4, 2019), <https://www.algemeiner.com/2019/11/04/german-far-right-leader-stirs-controversy-with-antisemitic-judas-tweet-aimed-at-popular-musician/>; Kyra Levine and Christoph Strack, *Germany: Far-Right lawmaker ousted from committee over anti-Semitism*, Deutsche Wells (Nov. 13, 2019), <https://www.dw.com/en/germany-far-right-lawmaker-ousted-from-committee-over-anti-semitism/a-51229697>.

³¹ Pastor Rick Wiles also declared on the video, “Should the Jews take over the country, they will conduct a purge... That’s the next thing that happens when Jews take over a country – they kill millions of Christians.” Dan Maclean, *YouTube removes video of pastor saying Trump impeachment is a ‘Jew coup’ but doesn’t ban him*, Independent (Dec. 1, 2019), <https://www.independent.co.uk/news/world/americas/us-politics/trump-impeachment-jew-coup-pastor-rick-wiles-youtube-video-a9228521.html>; Senior U.S. government officials were criticized for failing to denounce the statements in the video, and for subsequently providing press credentials to TruNews to cover the World Economic Forum. Michael M. Grynbaum, *Site That Ran Anti-Semitic Remarks Got Passes for Trump Trip*, New York Times (Jan. 26, 2020), <https://www.nytimes.com/2020/01/26/business/media/trunews-white-house-press-credentials.html>.

³² Dan Maclean, *YouTube removes video of pastor saying Trump impeachment is a ‘Jew coup’ but doesn’t ban him*, Independent (Dec. 1, 2019), <https://www.independent.co.uk/news/world/americas/us-politics/trump-impeachment-jew-coup-pastor-rick-wiles-youtube-video-a9228521.html>.

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³⁴ Cnaan Liphshiz, *Prominent Italian painter unveils a work depicting anti-Semitic blood libel*, The Times of Israel (Mar. 27, 2020), <https://www.timesofisrael.com/prominent-italian-painter-unveils-a-work-depicting-anti-semitic-blood-libel/>; Dexter Van Zile, *Italian Bishop Condemns Antisemitic Painting*, CAMERA (Apr. 3, 2020), <https://www.camera.org/article/italian-bishop-condemns-antisemitic-painting/>.

³⁵ *Rise in antisemitic hatred during COVID-19 must be countered with tougher measures, says UN expert*, Office of the UN High Commissioner for Human Rights (OHCHR) (April 17, 2020), <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=25800&LangID=E>.

³⁶ See Annex, available at <https://www.jbi-humanrights.org/JBI%20Six%20Month%20Review%20of%20Global%20Antisemitism.pdf>

³⁷ *Working Definition of Antisemitism*, International Holocaust Remembrance Alliance (Jun. 27, 2016), <https://www.holocaustremembrance.com/stories/working-definition-antisemitism>.

³⁸ Community Security Trust, *Coronavirus and the Plague of Antisemitism* (2020). Available at <https://cst.org.uk/data/file/d/9/Coronavirus%20and%20the%20plague%20of%20antisemitism.1586276450.pdf>.

³⁹ Desmond Brown, *Toronto synagogue's Zoom prayer service hijacked by trolls screaming derogatory slurs*, CBC (Apr 26, 2020), <https://www.cbc.ca/news/canada/toronto/zoom-church-service-hijacked-toronto-synagogue-hate-crime-1.5545776>. Immigration Minister Marco Mendicino has condemned the incident saying anti-Semitism, hatred and division have no place anywhere in Canada. A Toronto police spokesperson said the incident was being investigated as a possible hate crime.

⁴⁰ Lee Rogers, *Jews Panic Over Accusations that the Coronavirus Pandemic is a Jewish Plot*, The Daily Stormer (Mar. 16, 2020), <https://dailystormer.su/jews-panic-over-accusations-that-the-coronavirus-pandemic-is-a-jewish-plot/>

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<https://twitter.com/DrDavidDuke/status/1238138234414211075>. David Duke Twitter: Dr Duke & Andy Hitchcock – Zio Goldman Sachs Gets filthy Rich from Coronavirus! & How to Stop Coronavirus in It's Tracks! David Duke (@DrDavidDuke), Twitter (Mar. 17, 2020), <https://twitter.com/DrDavidDuke/status/1239953516850040840>.

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⁴⁵ Carlos Latuff (@LatuffCartoons), Twitter (Mar. 30, 2020), <https://twitter.com/LatuffCartoons/status/1244618294214230016>.

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⁴⁷ Krassimir Ivandjiiski, *Coronavirus Bio-attack Carried Out by the Zio-Anglo-American Axis*, Strogo Sekretno, (Feb. 10, 2020), <https://strogosekretno.com/index.php?p=newsroom&nid=9498>.

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<https://www.jpost.com/diaspora/antisemitism/iranian-health-ministry-holds-antisemitic-coronavirus-cartoon-contest-624646>.

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⁶⁹ *Friday Sermon by Yemeni Scholar Ibrahim Al-Ubeidi: Coronavirus Is Part of a Plan by the Jews, Israel, U.S. to Control Mecca, Medina; The Suad Clan Is a Jewish Family Brought into Power in Order to Judaize These Cities*,

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⁷⁰ Josh Margolin, *White supremacists encouraging their members to spread coronavirus to cops, Jews, FBI says*, ABC News (Mar. 23, 2020), <https://abcnews.go.com/US/white-supremacists-encouraging-members-spread-coronavirus-cops-jews/story?id=69737522>.

⁷¹ On March 23rd the FBI's New York office released a report to local law enforcement noting that online extremist groups are encouraging members who become infected with COVID-19 to spread the virus to police and Jews in New York. Josh Margolin, *White supremacists encouraging their members to spread coronavirus to cops, Jews, FBI says*, ABC News (Mar. 23, 2020), <https://abcnews.go.com/US/white-supremacists-encouraging-members-spread-coronavirus-cops-jews/story?id=69737522>.

⁷² In Lakewood, New Jersey, at least one person has been charged with a criminal offense for making violent threats against Jewish residents of the town, because he believed they were not following State-level ordinances designed to mitigate the spread of COVID-19. Dan Alexander, *Man Arrested over Facebook Threat Against Jews in Lakewood*, New Jersey 101.5 (Mar. 28, 2020), <https://nj1015.com/man-arrested-after-facebook-threat-against-jews-in-lakewood/>; Erik Larsen, *Coronavirus in NJ: Howell man charged with 'terroristic threats' against Lakewood Community*, Asbury Park Press NJ (Mar. 27, 2020), <https://www.app.com/story/news/local/jackson-lakewood/2020/03/27/coronavirus-nj-howell-man-charged-terroristic-threats-against-lakewood-community/2931255001/>.

⁷³ Press Release, U.S. Dep't of Justice, *East Longmeadow Man Charged with Attempted Arson at Longmeadow Assisted Living Residential Facility* (Apr. 15, 2020), <https://www.justice.gov/usao-ma/pr/east-longmeadow-man-charged-attempted-arson-longmeadow-assisted-living-residential>. Reportedly, social media users referring to the facility as "that jew nursing home in longmeadow massachusetts," and ta calendar event s listed April 3, 2020 as "jew killing day. On April 15, police arrested John Michael Rathbun and charged him with two counts of attempted arson. Rathbun has denied having any involvement in white supremacist groups. Christopher Mathlas, *Man Arrested In Alleged White Supremacist Plot To Burn Down Jewish Nursing Home*, Huffington Post (Apr. 16, 2020), https://www.huffpost.com/entry/john-michael-rathbun-arrested-jewish-nursing-home-arson-massachusetts_n_5e988e67c5b6ead1400972ee. As of this time, the FBI has not determined whether Rathbun was involved with the white supremacist group, but have seized his computer and noted that the investigation is continuing. Michael Levenson, *Man Charged With Trying to Blow Up Jewish Assisted-Living Home*, New York Times (Apr. 16, 2020), <https://www.nytimes.com/2020/04/16/us/massachusetts-bomb-jewish-nursing-home.html?login=smartlock&auth=login-smartlock>.

⁷⁴ Timothy Wilson was shot and killed on March 24 as FBI agents attempted to arrest him for plotting to blow up a hospital treating patients of the virus. It was reported that Wilson had initially planned to blow up either a mosque or a synagogue, but once the coronavirus pandemic began, he decided that a hospital would allow him to kill more people. *FBI Foils Neo-Nazi Plot to Blow Up Missouri Hospital*, Homeland Security News Wire (Mar. 27, 2020), <http://www.homelandsecuritynewswire.com/dr20200327-fbi-foils-neo-nazi-plot-to-blow-up-missouri-hospital>; Nick R. Martin, *Heartland Terror*, The Informant (Mar. 25, 2020), <https://www.informant.news/p/heartland-terror>.

⁷⁵ For the incident at the Chabad Center, *More Antisemitism in Boston, Police Searching for Suspect*, StopAntisemitism (Apr. 8, 2020), <https://www.stopantisemitism.org/antisemitic-incidents-31/more-antisemitism-in-boston-police-searching>; The first incident in Huntsville occurred at the Etz Chayim temple on April 8, the first night of Passover. The second synagogue, the Chabad of Huntsville, was vandalized the following night. *Two Synagogues Vandalized With Swastikas, Anti-Semitic Slurs*, U.S. News (Apr. 10, 2020), <https://www.usnews.com/news/best-states/alabama/articles/2020-04-09/synagogue-vandalized-with-swastikas-anti-semitic-slurs>; *Two Synagogues in Alabama vandalized; Police Search for Perpetrator, Reward Offered*, The Jewish Press (Apr. 14, 2020), <https://www.jewishpress.com/news/us-news/two-synagogues-in-alabama-vandalized-police-search-for-perpetrator-reward-offered/2020/04/14/>. Following the first incident, the Mayor of Huntsville, Thomas Battle said, "The City of Huntsville condemns anti-Semitism in the strongest possible terms," and urged anyone with information to come forward to the police. *Huntsville synagogue vandalized with anti-Semitic graffiti*, WAFF 48 (Apr. 9, 2020), <https://www.waff.com/2020/04/09/huntsville-synagogue-vandalized-with-anti-semitic-graffiti/>. For Los Angeles incident, see "*FU*K KIKES*" *Found on L.A. Synagogue Day Before Passover*, StopAntisemitism (Apr. 7, 2020), <https://www.stopantisemitism.org/antisemitic-incidents-31/3d9mbxkiidxwr9gojgxc7tr4ztnqu>. For Sarasota incident, see *Florida Police Searching for Antisemitic Vandal Responsible for Synagogue Graffiti*, StopAntisemitism (Apr. 19, 2020), <https://www.stopantisemitism.org/antisemitic-incidents-32/florida-police-searching-for-antisemitic-vandal-responsible-for-synagogue-graffiti>. For Rockville incident, see *Maryland*

Synagogue Defaced with Swastikas, StopAntisemitism (Apr. 2, 2020), <https://www.stopantisemitism.org/antisemitic-incidents-31/maryland-synagogue-defaced-with-swastikas>.

⁷⁶Johnston's Toyota dealership in Goshen, NY repeatedly denied service to a Hasidic Jewish man [whose name has not been reported in the press] by falsely telling him that they were closed due to the coronavirus when he arrived for a previously scheduled appointment on March 23 and then again telling him to leave when he arrived for a new appointment later that day that he had scheduled over the telephone after seeing other's cars being serviced, saying "you are spreading the virus." *Jewish Man Told "You Are Spreading the Virus" at New York Toyota Dealership*, StopAntisemitism (Mar. 24, 2020), <https://www.stopantisemitism.org/antisemitic-incidents-30/jewish-man-told-you-are-spreading-the-virus-at-new-york-toyota-dealership>; Itamar Eichner and Amir Bogan, *Haredi Jews in NY accused of 'spreading the virus'*, Ynetnews (Mar. 24, 2020), <https://www.ynetnews.com/article/BkcT93PIU>; StopAntisemitism (@StopAntisemites), Twitter (Mar. 23, 2020), <https://twitter.com/StopAntisemites/status/1242114781848440837>; Ari Feldman, *Hasidic man refused service by Toyota dealership 'because you're spreading the virus'*, The Forward (Mar. 23, 2020), <https://forward.com/fast-forward/442216/coronavirus-hasidic-toyota/>. It was reported on March 24 that the New York Attorney General and Orange County District Attorney David Hoovler are investigating this allegation. Hoovler noted that, "No business can withhold service from any person on account of their race, creed, color, or national origin, even during this time of emergency. Daniel Axelrod, *Authorities investigate allegations of anti-Semitism at car dealership*, Times Herald-Record (Mar. 24, 2020), <https://www.recordonline.com/news/20200324/authorities-investigate-allegations-of-anti-semitism-at-car-dealership>.

⁷⁷ *Arsonists Attack Synagogue In Russia's Northwestern City of Arkhangelsk*, Radio Free Europe/Radio Liberty (Apr. 14, 2020), <https://www.rferl.org/a/arsonists-attack-synagogue-in-russia-s-northwestern-city-of-arkhangelsk/30552610.html>.

⁷⁸ See International Covenant on Civil and Political Rights, article 18; UN Declaration on the elimination of all forms of intolerance and discrimination based on religion or belief, UN Doc. A/RES/36/55 (1981)

⁷⁹ See OHCHR, Emergency Measures and COVID-19: Guidance (Apr. 27, 2019). Available at https://www.ohchr.org/Documents/Events/EmergencyMeasures_COVID19.pdf.

⁸⁰ Report of the UN Special Rapporteur on Freedom of Religion or Belief, *Freedom of religion or belief and gender equality*, UN Doc. A/HRC/43/48 (Feb. 27, 2002) paras. 66 and 72.

⁸¹ In the U.K. bill designed to give emergency powers to the government in light of coronavirus faced intense criticism from Britain's Muslim and Jewish communities after it was revealed that they contained mandatory cremation provisions. The original text of the bill noted that "personal choice for body disposal will be respected as far as possible," but that "where there is no suitable alternative, the power to direct may be used to direct whether a body is buried or cremated." Ahmet Gurhan Kartal, *COVID-19: UK's faith groups react to mandatory cremation*, Anadolu Agency (Mar. 23, 2020), <https://www.aa.com.tr/en/europe/covid-19uks-faith-groups-react-to-mandatory-cremation/1776042>. On March 23, the government agreed to amend the legislation with Health Secretary Matt Hancock stating that they recognized the need to "accede to the wishes of the families and faith communities. Jeremy Sharon, *UK to give religious exemptions for cremation during coronavirus pandemic*, The Jerusalem Post (Mar. 23, 2020), <https://www.jpost.com/international/uk-jews-worried-dead-may-be-cremated-due-to-coronavirus-pandemic-621997>. *Coronavirus: UK amends emergency bill that called for mandatory cremations*, Middle East Eye (Mar. 23, 2020), <https://www.middleeasteye.net/news/coronavirus-uk-amends-emergency-bill-muslims-jews-other-faiths-mandatory-cremations>.

⁸² On March 27, the Romanian government ordered that all coronavirus victims be buried on the day of their death or cremated. This order faced criticism from the Jewish community because cremation is not allowed under Jewish religious law, and burials are not allowed to take place on Shabbat. In response, Rabbi Avigdor Nebenzahl, the president of the Rabbinical Council of Zaka, ruled that the Bucharest Jewish community could have a Christian bury any coronavirus victim who died on Shabbat in order to prevent them from being cremated. Marcy Oster, *Bucharest Jews can bury coronavirus dead on Shabbat to avoid cremation, a rabbinical authority rules*, Jewish Telegraphic Agency (Mar. 30, 2020), <https://www.jta.org/quick-reads/bucharest-jews-can-bury-coronavirus-dead-on-shabbat-to-avoid-cremation-a-rabbinical-authority-rules>.

⁸³ In late March, it was reported that in Buenos Aires, Ruben Bercovich, the first Jewish victim of the coronavirus in Argentina, was cremated by local authorities, who said that cremation was a best practice to avoid spread of the disease. Following his death and cremation, dialogue began between Argentine rabbis and officials to find a compromise on this matter. *Cremation of first Jewish victim of coronavirus in Argentina stirs controversy*, The Times of Israel (Mar. 29, 2020), <https://www.timesofisrael.com/cremation-of-first-jewish-victim-of-coronavirus-in-argentina-stirs-controversy/>.

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- ⁸⁵ *The Working Definition of Antisemitism*, AJC, <https://www.ajc.org/the-working-definition-of-antisemitism>.
- ⁸⁶ Report of the UN Special Rapporteur on freedom of religion or belief, Ahmed Shaheed, *Elimination of all forms of religious intolerance*, ¶¶ 78 & 88, U.N. Doc. A/74/358 (Sep. 20, 2019), <https://undocs.org/A/74/358>.
- ⁸⁷ Letter dated February 13, 2020 from Secretary-General Antonio Guterres to members of U.S. Congress. On file with JBI.
- ⁸⁸ See Report of the Special Rapporteur para. 76-77.
- ⁸⁹ See ICCPR article 20(2).
- ⁹⁰ See ICCPR article 18.
- ⁹¹ See ICCPR article 19.
- ⁹² See Report of the Special Rapporteur, paras. 70-72, 76, 87-88. See also Office of the UN High Commissioner for Human Rights, Rabat Plan of Action on the prohibition of advocacy of national, racial, or religious hatred that constitutes incitement to discrimination, hostility or violence (2012) available at www.ohchr.org.
- ⁹³ See report of the Special Rapporteur. para. 81.
- ⁹⁴ Local government officials have also called out antisemitism. Following the incidents in Lakewood, New Jersey connected to coronavirus, public officials have responded to these incidents by urging residents not to scapegoat Jewish Orthodox people. At a coronavirus briefing on March 26, Governor Phil Murphy noted that, “folks are using a couple of examples [of noncompliance] to extrapolate and start blaming and vilifying communities. In this case, our Jewish brothers and sisters.” French President Emmanuel Macron condemned the rise in antisemitic violence in France on February 18 through a tweet on his way to a protest against repeated attacks on Jews within the nation, posting that “Anti-Semitism is the opposite of what France is.” James McAuley, *As anti-Semitism rises in France, Macron’s government struggles to respond*, Washington Post (Feb. 19, 2019), https://www.washingtonpost.com/world/as-anti-semitism-rises-in-france-macrons-government-struggles-to-respond/2019/02/19/2aa9fb52-345a-11e9-8375-e3dcf6b68558_story.html.
- ⁹⁵ *Germany warns of spike in anti-Semitism linked to coronavirus*, The Local (Apr. 7, 2020), <https://www.thelocal.de/20200407/germany-warns-of-spike-in-anti-semitism-linked-to-coronavirus>.
- ⁹⁶ *France pledges hate crime office after Jewish cemetery desecrated*, France 24 (Apr. 12, 2019), <https://www.france24.com/en/20191204-france-pledges-hate-crime-office-after-jewish-cemetery-desecrated>.
- ⁹⁷ Felice Gaer, *Fighting Antisemitism and Hate Speech: Is the UN an Ally or an Antagonist?*, AJC Advocacy Anywhere (April 20, 2020), <https://www.ajc.org/news/fighting-antisemitism-and-hate-speech-is-the-un-an-ally-or-an-antagonist-ajc-advocacy-anywhere>.
- ⁹⁸ “*Addressing and preventing antisemitism through education*”, The Holocaust and the United Nations Outreach Programme (2019), <https://www.un.org/en/holocaustremembrance/2019/report.shtml>.
- ⁹⁹ *2020 Holocaust Remembrance Events: Statements in 2020*, The Holocaust and the United Nations Outreach Programme, <https://www.un.org/en/holocaustremembrance/2020/statements2020.shtml>
- ¹⁰⁰ *75 years after Auschwitz liberation, antisemitism still threatens ‘foundations of democratic societies’*, UN News (Jan. 23, 2020), <https://news.un.org/en/story/2020/01/1055851>.
- ¹⁰¹ See United Nations, *COVID-19 and Human Rights: We are all in this together* (Apr. 2020). Available at https://www.un.org/sites/un2.un.org/files/un_policy_brief_on_human_rights_and_covid_23_april_2020.pdf; *A Joint call for Solidarity, Compassion and Unity*, UNAOC (Mar. 26, 2020), <https://www.unaoc.org/2020/03/a-joint-call-for-solidarity-compassion-and-unity/>; Michelle Bachelet (@mbachelet), Twitter (Apr. 28, 2020), https://twitter.com/mbachelet/status/1255160337948606464?ref_src=twsrc%5Etfw%7Ctwcamp%5Eembeddedtime%7Ctwtterm%5Eprofile%3AUNHumanRights%7Ctwcon%5Etimelinechrome&ref_url=https%3A%2F%2Fwww.ohchr.org%2FEN%2Fpages%2Fhome.aspx.
- ¹⁰² Report of the Special Rapporteur, paras. 87-88.
- ¹⁰³ Alicia Lee, *New Jersey’s governor accused a Facebook group’s page of being anti-Semitic. Facebook shut it down*, CNN (Feb. 6, 2020) <https://www.cnn.com/2020/02/06/us/facebook-new-jersey-hate-speech-trnd/index.html>. In February, YouTube permanently banned the fundamentalist Christian TruNews channel, which repeatedly aired antisemitic content; however, episodes of TruNews can still be found on other YouTube channels. JTA and Marcy Oster, *YouTube Permanently Bans TruNews Channel that Called Trump’s Impeachment ‘Jew Coup’*, Haaretz (Feb. 24, 2020), <https://www.haaretz.com/us-news/youtube-permanently-bans-channel-that-called-trump-s-impeachment-jew-coup-1.8569322>. In early February, Facebook removed a page called Rise Up Ocean County, which targeted the Orthodox Jewish community in Lakewood, New Jersey, after local leaders condemned it as antisemitic. Ben Sales, *Facebook takes down New Jersey page accused of anti-Semitism*, Jewish Telegraphic Agency (Feb. 5, 2020),

<https://www.jta.org/quick-reads/facebook-takes-down-new-jersey-countys-page-accused-of-anti-semitism>. In February, Facebook and Twitter reportedly suspended an antisemitic Telegram channels accounts on their platforms. Alex Kaplan, *An anti-Semitic Telegram channel targeting Jews created a Facebook page. Facebook said it doesn't violate its policies.*, Media Matters (Feb. 25, 2020), <https://www.mediamatters.org/facebook/anti-semitic-telegram-channel-targeting-jews-created-facebook-page-facebook-said-it-doesnt>. In March, Twitter removed posts made by a former sheriff in Wisconsin after he tweeted that George Soros was involved in the spread of hysteria surrounding coronavirus. Twitter removed these posts for violating its policies. Eric Litke, *Former Sheriff David Clarke rants coronavirus is just "the damn flue" (it's not)*, PolitiFact (Mar. 19, 2020), <https://www.politifact.com/factchecks/2020/mar/19/david-clarke-jr/former-sheriff-david-clarke-rants-coronavirus-just/>. Apple reportedly blocked approximately 20 far-right Telegram channels that posted content praising mass shootings, and encouraged the intimidation of individuals based on their religion, race and ethnicity on January 20. *Extremist Content Online: Anti-Semitic Instagram Account That Has Advocated for Violence Against Jews Not Removed*, Counter Extremism Project (Jan. 27, 2020), <https://www.counterextremism.com/press/extremist-content-online-anti-semitic-instagram-account-has-advocated-violence-against-jews>.

¹⁰⁴ Facebook Newsroom (@fbnewsroom), Twitter (Mar. 16, 2020), https://twitter.com/fbnewsroom/status/1239703497479614466?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E1239703497479614466&ref_url=https%3A%2F%2Ftechcrunch.com%2F2020%2F03%2F16%2Ffacebook-reddit-google-linkedin-microsoft-twitter-and-youtube-issue-joint-statement-on-misinformation%2F.

¹⁰⁵ Salvador Hernandez, *A Zoom Meeting For Women Of Color Was Hijacked By Trolls Shouting The N-Word*, BuzzFeed News (Apr. 1, 2020), <https://www.buzzfeednews.com/article/salvadorhernandez/zoom-coronavirus-racist-zoombombing>; Press Release, FBI Boston, FBI Warns of Teleconferencing and Online Classroom Hijacking During COVID-19 Pandemic (Mar. 30, 2020), <https://www.fbi.gov/contact-us/field-offices/boston/news/press-releases/fbi-warns-of-teleconferencing-and-online-classroom-hijacking-during-covid-19-pandemic>.

¹⁰⁶ Andrew Torba, *It's Time To Build a Free Speech Internet Of Our Own*, Gab (Oct. 18, 2019), <https://news.gab.com/2019/10/18/its-time-to-build-a-free-speech-internet-of-our-own/#more-1363>.

¹⁰⁷ Gabriel Weimann and Natalie Masri, *The Virus of Hate: Far-Right Terrorism in Cyberspace*, International Institute for Counter-Terrorism (Apr. 5, 2020), https://www.ict.org.il/Article/2528/The_Virus_of_Hate#gsc.tab=0.

¹⁰⁸ See, e.g. Alex Kaplan, *An anti-Semitic Telegram channel targeting Jews created a Facebook page. Facebook said it doesn't violate its policies.* Media Matters (Feb. 25, 2020), <https://www.mediamatters.org/facebook/anti-semitic-telegram-channel-targeting-jews-created-facebook-page-facebook-said-it-doesnt>; *Extremist Content Online: Anti-Semitic Instagram Account That Haws Advocated for Violence Against Jews Not Removed*, Counter Extremism Project (Jan. 27, 2020), <https://www.counterextremism.com/press/extremist-content-online-anti-semitic-instagram-account-has-advocated-violence-against-jews>.

¹⁰⁹ Apple's App Store Review Guidelines ban apps that contain "Defamatory, discriminatory, or mean-spirited content, including references or commentary about religion, race, sexual orientation, gender, national/ethnic origin, or other targeted groups," while Google Play's Developer Policy bans apps "that promote violence, or incite hatred against individuals or groups based on race or ethnic origin, religion." Ali Breland, *Ahead of Richmond Rally, Apple and Google Are Letting Nazis Use This App to Coordinate*, Mother Jones (Jan. 19, 2020), <https://www.motherjones.com/politics/2020/01/telegram-nazis-richmond/>.

¹¹⁰ United Nations Strategy and Plan of Action on Hate Speech (2018). Available at <https://www.un.org/en/genocideprevention/documents/UN%20Strategy%20and%20Plan%20of%20Action%20on%20Hate%20Speech%2018%20June%20SYNOPSIS.pdf>.

¹¹¹ UNSG António Guterres, *The Highest Aspiration: A Call to Action for Human Rights* (2020). Available at https://www.un.org/sg/sites/www.un.org.sg/files/atoms/files/The_Highest_Aspiration_A_Call_To_Action_For_Human_Right_English.pdf.

¹¹² See Felice Gaer, Director of AJC's Jacob Blaustein Institute for the Advancement of Human Rights, Plenary Remarks at the 7th meeting of the Istanbul Process – "Combatting religious intolerance: Building inclusive and resilient societies and pushing back against incitement to hatred and violence" (Nov. 18, 2019). Available at <https://www.jbi-humanrights.org/JBI%20Felice%20Gaer%20Plenary%20Remarks%207th%20Istanbul%20Process%20Mtg%20The%20Hague%20Nov%202019.pdf>.