

FAO: Corporate Services Team
Bar Standards Board
289-293 High Holborn
London
WC1V 7HZ
DX: 240 LDE

06 AUGUST 2025

Dear Sir/Madam

Re: Natasha Hausdorff; Jonathan Turner; and Brian Doctor KC

This is a complaint made against the following Barristers: Natasha Hausdorff; Jonathan Turner; and Brian Doctor KC, respectively Respondent's 1, 2 and 3. The Respondents are officers of UK Lawyers For Israel (UKLFI), a lobby group representing the far right Government of Israel, and at all material times present their capacity as Barristers from the UK. Respondent's 2 and 3 are directors of UKLFI and their biographies list their role and achievements as Barristers¹ (ANNEX 1). In Respondent 2's chambers biography he lists being Chair of UKLFI under "Qualifications & appointments"². Respondent 1 is listed as a Director of UKLFI³ (ANNEX 2) and frequently appears in the media in this role to defend Israel's actions whilst describing herself as a Barrister⁴.

This complaint alleges that Natasha Hausdorff (NH), Jonathan Turner, and Brian Doctor KC, acting via UKLFI, breached CD3, CD5, and CD12 by submitting false BSB/ICC applications against Karim Khan KC (27 Aug 2024) and making seriously offensive media statements. NH's BBC interview (7 Feb 2025), Foreign Affairs Committee appearance (22 Apr 2025), and Piers Morgan debate (3 Jun 2025) falsely denied Gaza starvation and misrepresented law, eroding trust. Turner's obesity claim (May 2025) and NH's Rafah assertions are discriminatory. Evidence includes UN reports, media transcripts, and photos. I request a full investigation with potential sanctions.

Breaches of the Bar Standards Board of Conduct:

- CD3 - "You must act with honesty and integrity"
- CD5 - "You must not behave in a way which is likely to diminish the confidence which the public places in you or in the profession."
- CD12 - "You must not discriminate unlawfully against, victimise or harass any other person on the grounds of race, color, ethnic or national origin, nationality, citizenship sex, gender reassignment, sexual orientation, marital or civil partnership status, disability, age, religion or belief, or pregnancy and maternity."

The Code is clear that these foundational standards of conduct go beyond the context of advocating for clients, but also apply to public media appearances.

BASIS OF COMPLAINT AGAINST RESPONDENT'S 1, 2, AND 3

¹ <https://www.uklfi.com/about-us-2/our-directors>

² <https://threestone.law/barrister/jonathan-dc-turner/>

³ <https://www.uklfi.com/about-us-2/our-directors/natasha-hausdorff>

⁴ <https://www.thejc.com/news/meet-the-brilliant-barrister-battling-lies-about-israel-ab2dxq8g>

UKLFI Application to the ICC and BSB

Background

1. This complaint is based on the extraordinary claims made by the Respondent's that the ICC Prosecutor Karim Khan KC was not telling the truth that there is starvation in Gaza. It is necessary to set out in some detail just some of the information that exists in the public domain describing the humanitarian crises in Gaza.

2. On 9 October 2023, Israeli Minister of Defence Yoav Gallant said:

I have ordered a complete siege on the Gaza Strip. There will be no electricity, no food, no fuel. Everything is closed. We are fighting human animals and we are acting accordingly.

3. In addition to the blockade Israel has systematically destroyed the ability for Gaza to produce food. Israeli bombardment and the blockade have led to a total collapse of Gaza's civil infrastructure, including sewage treatment, waste disposal, water management, and fuel supplies. In October 2024, UNOSAT and the Food and Agriculture Organization estimated 67.6% of Gaza's croplands had been damaged⁵ and bombing by the Israeli army has created 50 million tonnes of debris and hazardous material, much of which contains human remains and tens of thousands of bombs. In June 2024, northern Gaza was described as a "wasteland", unable to sustain life.⁶ The size and lasting impact of the systematic and intentional destruction of agriculture in Gaza have led to calls by the research group Forensic Architecture at Goldsmiths, University of London, and the Palestinian Environmental NGOs Network for the Israeli Government to be investigated for the Rome Statute war crime of ecocide for "widespread, long-term and severe damage to the natural environment".⁷
4. On 7 December 2023, the WFP stated 97% of households had inadequate food consumption and 83% in southern Gaza were surviving through "extreme consumption strategies."⁸ By 10 December 2023, the UN, international aid organizations, and relief workers in Gaza warned of mass starvation.⁹ The United Nations humanitarian chief Martin Griffiths stated on 5 January 2024, "People are facing the highest levels of food insecurity ever recorded."¹⁰ Alex de Waal, an expert on humanitarian crises and international law, stated, "The rigor, scale and speed of the destruction of the structures necessary for survival, and enforcement of the siege,

⁵ <https://www.fao.org/newsroom/detail/gaza-geospatial-data-shows-intensifying-damage-to-cropland/en>

⁶ <https://www.aljazeera.com/news/liveblog/2024/6/3/israels-war-on-gaza-live-israeli-strike-on-gaza-refugee-camp-kills-four?update=2945046>

⁷ <https://www.theguardian.com/environment/2024/mar/29/gaza-israel-palestinian-war-ecocide-environmental-destruction-pollution-rome-statute-war-crimes-aoe>

⁸ Isaac, Lindsay (7 December 2023). "Gaza experiencing "alarming levels" of hunger, UN agency warns". CNN. 7 December 2023.

⁹ Balousha, Hazem. "Aid groups warn of starvation in Gaza after U.S. vetoes cease-fire call". The Washington Post. 4 January 2024

¹⁰ "World News in Brief: Gaza relief 'an impossible mission', COVID spreading fast again, food prices fall". UN News. United Nations. 5 January 2024.

surpasses any other case of man-made famine in the last 75 years."¹¹ By 30 January 2024, CNN reported that Palestinians were eating grass to stay alive.¹² On 31 January, the World Health Organization's emergencies director stated, "This is a population that is starving to death."¹³ In February 2024 Finance Minister Bezalel Smotrich personally blocked US-funded shipments of flour from entering Gaza, in violation of promises Israel had made to the US government, he stated he had done so "in coordination with the Prime Minister".¹⁴

5. The United Nations special rapporteur on the right to food Michael Fakhri said that Israel is "culpable" of genocide because "Israel has announced its intention to destroy the Palestinian people, in whole or in part, simply for being Palestinian" and because Israel was denying food to Palestinians by halting humanitarian aid and "intentionally" destroying

small-scale fishing vessels, greenhouses and orchards in Gaza ... We have never seen a civilian population made to go so hungry so quickly and so completely, that is the consensus among starvation experts. Israel is not just targeting civilians, it is trying to damn the future of the Palestinian people by harming their children.¹⁵

6. After the ICJ ruling, the number of aid trucks Israel allowed into Gaza dropped by 40%.¹⁶ In the ICJ's March reaffirmation of provisional measures, the court highlighted the "unprecedented levels of food insecurity experienced by Palestinians in the Gaza Strip over recent weeks, as well as the increasing risks of epidemics",¹⁷ acknowledging that since the Court's January order there had been a "lack of Israeli compliance" resulting in "the catastrophic living conditions" deteriorating further.
7. In March 2024, 12 Israeli human rights organisations signed an open letter accusing Israel of failing to abide by the ICJ ruling to prevent genocide by facilitating the delivery of humanitarian aid.¹⁸ In April the UN special rapporteur on the right to health Tlaleng Mofokeng said Israel was "killing and causing irreparable harm against Palestinian civilians with its bombardments", adding, "They are also knowingly and intentionally imposing famine" and accusing Israel of "genocide".¹⁹ The evidence of a blockade and resulting deprivation unanimous, widespread and corroborated by multiple agencies, as are the effects.

¹¹ Nolen, Stephanie (11 January 2024). "Looming Starvation in Gaza Shows Resurgence of Civilian Sieges in Warfare". The New York Times. Archived from the original on 13 January 2024. Retrieved 14 January 2024.

¹² Haq, Sana Noor. "'We are dying slowly:' Palestinians are eating grass and drinking polluted water as famine looms across Gaza". CNN. Archived from the original on 12 February 2024. Retrieved 31 January 2024.

¹³ Millard, Robin. "Gaza Population 'Starving To Death': WHO". Barron's. Archived from the original on 14 February 2024. Retrieved 1 February 2024.

¹⁴ "Smotrich blocks flour shipments from reaching Gaza, in breach of Israeli pledge to US". Times of Israel. 14 February 2024.

¹⁵ Lakhani, Nina (27 February 2024). "Israel is deliberately starving Palestinians, UN rights expert says". The Guardian.

¹⁶ Marsi, Federica (27 February 2024). "How much aid has entered Gaza?". Al Jazeera.

¹⁷ Sultany, Nimer (9 May 2024). "A Threshold Crossed: On Genocidal Intent and the Duty to Prevent Genocide in Palestine". Journal of Genocide Research

¹⁸ Beaumont, Peter; Burke, Jason (11 March 2024). "Israeli human rights groups accuse country of failing to abide by ICJ's Gaza aid ruling". The Guardian.

¹⁹ "Gaza health system 'completely obliterated': UN expert". Al-Monitor. Agence France-Presse. 22 April 2024

8. On 16 January, officials reported new-born babies with undernourished mothers were dying within days, and children weakened by starvation were dying from hypothermia.²⁰ On 18 January, the deputy executive director of UNICEF took a tour of the Gaza Strip, stating he had witnessed "some of the most horrific conditions I have ever seen" and that "thousands of children are malnourished and sick."²¹ On 10 February 2024, a UNICEF spokesperson said Gaza had the world's highest rate of child malnutrition.²² On 17 February, the Euro-Mediterranean Human Rights Monitor reported an instance of an 8-year-old girl who had died from starvation and dehydration.²³
9. On 19 February 2024, UNICEF found that nearly 16 percent of children in northern Gaza under two-years-old were "acutely malnourished", with 3 percent suffering from severe wasting.²⁴ On 28 February, a representative from Save the Children stated that due to Israeli bombardment and restrictions on aid, children were starving with trucks full of food waiting to enter into Gaza, describing this as "the killing of children in slow motion".²⁵
10. In March 2024, a doctor at the Emirati Hospital stated 16 premature babies had died from malnutrition-related diseases in the past five weeks.²⁶ The United Nations reported that one-third of children under two were "acutely malnourished" by 16 March.²⁷ Catherine M. Russell, the head of UNICEF, stated, "I have been in wards where babies are suffering from malnutrition, the whole ward is absolutely quiet because the babies don't even have the energy to cry."²⁸
11. Throughout Israel assault NGO's working with International Governmental Organisations have scientifically collated data and conducted analysis to determine malnutrition. The most common method is to document and analyse Mid Upper Arm Circumference (MUAC), please see report at ANNEX 3 as an example of such a scientific assessment.
12. According to a letter dated October 2, 2024 by 99 American healthcare workers who have served in the Gaza Strip since October 7, 2023: a paper from the Watson Institute for International and Public Affairs at Brown University, based on starvation

²⁰ <https://www.theguardian.com/world/2024/jan/16/no-food-no-water-no-heating-famine-exists-in-gaza-say-officials>

²¹ <https://www.unicef.org/eap/press-releases/statement-unicef-deputy-executive-director-ted-chaiban-upon-conclusion-his-visit>

²² <https://www.aljazeera.com/news/liveblog/2024/2/9/israels-war-on-gaza-live-fear-in-rafah-as-israel-prepares-ground-attack?update=2694547>

²³ <https://www.aljazeera.com/news/liveblog/2024/2/17/israels-war-on-gaza-live-icj-warns-of-perilous-situation-in-rafah?update=2714019>

²⁴ <https://www.who.int/news/item/19-02-2024-children-s-lives-threatened-by-rising-malnutrition-in-the-gaza-strip>

²⁵ <https://www.aljazeera.com/news/liveblog/2024/2/28/israels-war-on-gaza-live-thousands-could-die-in-days-as-israel-blocks-aid?update=2737126>

²⁶ <https://apnews.com/article/gaza-malnutrition-famine-children-dying-israel-palestinians-2f938b1a82d7822c7da67cc162da1a37>

²⁷ <https://www.aljazeera.com/news/liveblog/2024/3/16/israels-war-on-gaza-live-will-the-netanyahu-government-attack-rafah?update=2775901>

²⁸ <https://truthout.org/articles/israeli-forces-again-storm-al-shifa-hospital-where-30000-people-are-trapped/>

standards by the United States-funded Integrated Food Security Phase Classification, stated according to the most conservative estimate that they could calculate based on the available data, at least 62,413 people in Gaza are likely to have died from starvation, most of them young children.²⁹

13. In October 2024, Israel had reportedly adopted a modified version of the Generals' Plan³⁰ which included orders for a full siege on water, food, and fuel; by mid-October 2024 Israel had prevented the entry of humanitarian aid for almost two weeks.³¹ Since March 2025, Israel has made the blockade publicly official, with Defence Minister declaring that "No humanitarian aid will enter Gaza".³² All the reports from independent international organisation continue to document man made starvation until today, there are simply no credible independent reports otherwise.
14. Volker Turk the UN high commissioner for human rights, stated that Israel's restrictions on the entry of aid may constitute starvation as a weapon of war, which would be a war crime. An Independent International Commission of Inquiry also found Israel was using starvation as a method of war. In April and May 2024, USAID and the US State Department's Bureau of Population, Refugees and Migration determined that Israel was blocking food aid from entering Gaza.
15. On 21 November 2024, the International Criminal Court (ICC) issued arrest warrants for Israeli Prime Minister Benjamin Netanyahu and the former defence minister Yoav Gallant, asserting that the two "bear criminal responsibility for the war crime of starvation as a method of warfare".

The ICC Application

16. ICC Prosecutor Karim Khan KC filed applications at the Court on 20 May 2024 seeking warrants for the arrest of Israel's Prime Minister, Benjamin Netanyahu, and Defence Minister, Yoav Gallant. Those applications have not been published but the Prosecutor made a public statement on the day he filed them, in which he purported to summarise the grounds on which they were based. Those grounds centred around a charge that under the leadership of Netanyahu and Gallant, Israel has used and is using starvation of the civilian population as a method of warfare, by allegedly imposing a complete siege on Gaza.
17. Karim Khan KC's application was based on evidence collected by the prosecutor during his [visit](#) to Israel, Ramallah in the occupied West Bank, and Egypt's Rafah on the border with Gaza and include "interviews with survivors and eyewitnesses,

²⁹

https://watson.brown.edu/costsofwar/files/cow/imce/papers/2023/2024/Costs%20of%20War_Human%20TolI%20Since%20Oct%207.pdf

³⁰ Bowen, Jeremy (12 October 2024). "Israeli attack on northern Gaza hints at retired general's 'surrender or starve' plan for war". BBC News.

³¹ North Gaza siege: Netanyahu considers plan to starve out Hamas fighters". The Jerusalem Post. 23 September 2024.

³² <https://www.france24.com/en/live-news/20250416-israel-says-no-humanitarian-aid-will-enter-gaza>

authenticated video, photo and audio material, satellite imagery and statements from the alleged perpetrator group”.³³

COMPLAINTS AGAINST RESPONDENTS 1, 2 and 3

UKLFI Published BSB Complaint against Karim Khan KC

18. On 27 August 2024 UKLFI sent a letter (ANNEX 4), hereinafter referred to as the UKLFI letter, **signed by the three respondents** to Karim Khan KC as ICC Prosecutor stating “it appears to us from your Statement that the grounds of the Applications are based in their entirety on false information” and warning him that they will report him to the UK Bar Standards Board unless he agrees to review the evidence for the warrant for Benjamin Netanyahu. UKLFI published the letter on their website on 29 August 2024³⁴. The same UKLFI webpage setting out the allegations also contains a link to an article in the Telegraph which states the three Respondent’s “said Mr Khan’s refusal to reconsider the application in light of the evidence amounted to a “serious lack of integrity”, which could put him in breach of the Bar’s code of conduct.”
19. In two applications made by the second Respondent on behalf of UKLFI dated 06 September 2024 to the BSB and the ICC Registrar UKLFI alleged that ICC Karim Khan KC’s application was made on a false information and false statements. The basis for the allegation is set out in UKLFI’s own letter to Karim Khan dated 27 August 2024, and Annex B of that letter³⁵.
20. The ICC Prosecutor has not published the evidence which was submitted with the application, it is not in the public domain and UKLFI are not privy to it yet despite this the Respondents allege in the UKLFI letter that the Application to indict Israel’s leaders are based entirely on “false information”. It is simply not possible for the Respondents to know the evidence the application was based on and thus it is simply untruthful for them to maintain that it is based “entirely on false information”. The Respondents’ claim that Khan’s ICC application is ‘entirely false’ without access to evidence breaches rC9.1 (knowingly misleading) and CD5 (diminishing trust).
21. The basis for the UKLFI claim that Karim Khan produced false evidence to the ICC are that the claims that Israeli politicians had committed acts “as part of a common plan to use starvation as a method of war and other acts of violence against the Gazan civilian population” were contradicted by “official figures and statements released by the Israeli Government Department, Coordination of Government Activities in the Territories (“COGAT”))” which produced figures for aid delivery in Gaza by Israel showed people in Gaza were better off after the siege was imposed. However COGAT is a unit of the Israeli Ministry of Defence and it’s data is not independently verified or verifiable. COGAT is the entity overseeing the starvation policy and it’s claims have been rejected by multiple entities, including the European Union, United

³³ <https://www.icc-cpi.int/news/icc-prosecutor-karim-khan-kc-concludes-first-visit-israel-and-state-palestine-icc-prosecutor>

³⁴ <https://www.uklfi.com/uklfi-warns-icc-prosecutor-that-he-is-breaching-professional-rules>

³⁵ <https://www.uklfi.com/icc-prosecutor-karim-khan-kc-and-staff-reported-to-regulators-regarding-applications-to-arrest-israeli-leaders>

Nations, Oxfam, and United Kingdom³⁶. Where COGAT figures have been verifiable they have been found to be false, e.g. COGAT claimed 5000 aid trucks entered Gaza in December 2024 but the United Nations Office for the Coordination of Humanitarian Affairs (OCHA) verified that only 2,205 aid trucks had entered for the same period.³⁷

22. Annex B to UKLFI's letter repeats claims made in an Israeli Foreign Ministry document³⁸ which sets out a series of arguments seeking to discredit the IPC findings. These arguments are about assessment methodology standards without actually engaging with the evidence on the ground. Moreover Israel's criticism of IPC assessment methodology, which forms the basis of Annex B, have been thoroughly debunked by the international community including in a report dated September 2024 entitled *Untangling the Reality of Famine in Gaza by Refugees International*³⁹ (ANNEX 5).
23. The UKLFI letter and Annex B and Israeli Foreign Ministry report also rely heavily on a pre-print non-peer reviewed paper authored by Israeli academics who use the unverifiable and incredible COGAT data to conclude "that food delivered through crossings into the Gaza Strip between January and April 2024 constituted a mean of 3268 calories per person per day", 50% more than Sphere guidelines. However the aforementioned Refugee International report⁴⁰ (ANNEX 5) states that for the same period:

Malnutrition rates were rapidly accelerating toward famine-threshold levels, having doubled in northern Gaza between January and March. Deaths from apparent starvation were starting to emerge. All evidence indicated a rapidly spiralling hunger crisis, primarily brought on by restrictions on aid and commercial access. In response, USAID Administrator Samantha Power in a March 18 statement declared Gaza was at a "serious risk of famine" ...

24. Neither UKLFI, Israeli Foreign Ministry or COGAT refer to any assessment of actual facts of the ground in Gaza; or any of the assessments referred to above; or any of the hundreds of scientifically documented reports of malnutrition; and do not seek to reconcile the unverifiable COGAT figures with the verifiable and irrefutable evidence of man-made famine and starvation in Gaza. The lack of attempts to engage with the raw data of malnutrition and starvation mean that UKLFI claims that there is no starvation or malnutrition in Gaza is based on objectively verifiable false claims. This is a huge discrepancy.
25. Where the Respondents are forced to confront facts on the ground they resort to blatant misrepresentation to effectively mislead, in other words lying. The UKLFI letter states:

³⁶ https://edition.cnn.com/middleeast/live-news/israel-hamas-war-gaza-news-03-18-24#h_afad01e49a4f0473ec78987500e0aede

³⁷ <https://edition.cnn.com/2025/01/04/middleeast/israel-gaza-aid-limits-trump-intl/index.html>

³⁸ <https://www.gov.il/en/pages/transparency-and-methodology-issues-in-the-ipc-special-brief-of-18-march-2024>

³⁹ <https://d3jwam0i5codb7.cloudfront.net/wp-content/uploads/2024/09/Gaza-Famine-Report-REVISED.pdf>

⁴⁰ *Untangling the Reality of Famine in Gaza by Refugees International*

Furthermore, there does not appear to be any scientific evidence of an “increasing number of deaths” from starvation. ... Moreover, despite the Gaza Ministry of Health claim that there have been 34 deaths since the beginning of the war allegedly caused by starvation, the chief paediatrician of Kamal Adwan hospital, where the majority of the starvation deaths have been reported, said that the cause of death in these cases was not lack of food or water, but intestinal infections. This anecdotal evidence should be put in context ...

26. The footnote for the above text in the UKLFI letter leads to a Telegraph article dated 22 February 2024⁴¹ (ANNEX 6) and in that article the chief paediatrician of Kamal Adwan hospital states his team had “lost a significant number of children in recent days from widespread malnutrition” and he also additionally states “There is a spread of infection, especially at the level of the digestive system, most cases come in a very advanced and critical situation, due to the occurrence of intestinal infections, the complications of which include dehydration.” These are clearly not mutually exclusive phenomena nor is there reason to think they are the same phenomena, the article evidences deaths from malnutrition as well as from infection. It is simply untruthful to say “the chief paediatrician of Kamal Adwan hospital, ... said that the cause of death in “these cases [34 deaths] was not lack of food or water, but intestinal infections”.
27. However even more concerning is that the 34 malnutrition deaths had not even occurred or been reported by the date of the February 2024 Telegraph article. The Telegraph article makes no mention at all of the 34 deaths. The 34 deaths were first reported in a UN Press Release on 09 July 2024⁴² (ANNEX 7) recording them to have occurred in May and June 2024. It is a misrepresentation to claim that the Telegraph article denies deaths which had not even occurred at the time it was written. Further the report of 34 deaths is not based on “anecdotal evidence” and the source of the information was not the Gaza Ministry of Health but a group of 8 independent UN experts.
28. These errors cannot logically have been arrived at by mistake, i.e. it is not possible for anyone let alone three senior Barrister to conclude the Telegraph article denies deaths that are first reported five months later especially given the importance of that point. The misrepresentations have a defined purpose (to deny atrocities against Palestinians and exonerate Israel) in line with their stated mission to defend Israel and reflect established Israeli patterns of systematic falsehoods concerning Palestinians⁴³ (see ANNEX 8). There can be no conclusion other than there has been a deliberate provision of untruthful evidence by the Respondents. At the very least these are examples of sustained reckless misrepresentation of evidence, which contribute to undermining genocide investigations and damaging a fellow barrister’s reputation on a false premise. The Respondents signed the letter as intended to be submitted to the BSB as part of its complaint against Karim Khan KC and published the complaint.

⁴¹ <https://www.telegraph.co.uk/global-health/terror-and-security/gaza-malnutrition-israel-war-famine-children/#:~:text=intestinal%20infections>.

<https://www.telegraph.co.uk/global-health/terror-and-security/gaza-malnutrition-israel-war-famine-children/>

⁴² <https://www.ohchr.org/en/press-releases/2024/07/un-experts-declare-famine-has-spread-throughout-gaza-strip>.

⁴³ <https://www.theguardian.com/commentisfree/article/2024/may/02/israel-gaza-lies-western-backers>

The complaint against Karim Khan KC as well as representations to the ICC are legal proceedings and the Respondents have a duty under rC3:

You owe a duty to the court to act with independence in the interests of justice. ... This duty ... includes the following specific obligations ...:

- .1 you must not knowingly or recklessly mislead or attempt to mislead the court ;*
- .2 you must not abuse your role as an advocate;*
- .3 you must take reasonable steps to avoid wasting the court's time;*

29. The Respondents have a duty to behave ethically which they are in breach:

oC6

Those regulated by the Bar Standards Board maintain standards of honesty, integrity and independence, and are seen as so doing. oC7

The proper administration of justice, access to justice and the best interests of clients are served.

oC8

Those regulated by the Bar Standards Board do not discriminate unlawfully and take appropriate steps to prevent discrimination occurring in their practices.

oC9

Those regulated by the Bar Standards Board and clients understand the obligations of honesty, integrity and independence.

You must not do anything which could reasonably be seen by the public to undermine your honesty, integrity (CD3) and independence (CD4).

rC9

Your duty to act with honesty and with integrity under CD3 includes the following requirements:

- .1 you must not knowingly or recklessly mislead or attempt to mislead anyone;*
- .2 you must not draft any statement of case, witness statement, affidavit or other document containing:*

...

.c any allegation of fraud, unless you have clear instructions to allege fraud and you have reasonably credible material which establishes an arguable case of fraud;

30. Alternately even if it a matter in non-professional life the context of BSB disciplinary and ICC proceedings create a nexus between the profession and behaviour as set out in Case Study 5 of The BSB Guidance on the regulation of non-professional conduct⁴⁴:

Case Study 5

We receive a report about a barrister (B), who had been a party to family law proceedings in their personal capacity, deliberately giving untruthful evidence to the court. B has not been charged with contempt of court or a separate criminal offence.

Bearing in mind the dishonest and misleading nature of the alleged conduct, and the fact that dishonesty is a serious matter for a legal professional, and taking into account that

⁴⁴ <https://www.barstandardsboard.org.uk/static/e803d194-972c-43b4-84bf162568cee383/60838a0a-904d-4a15-92af9e236b2ed1a2/Guidance-on-the-regulation-of-non-professional-conduct-September-2023.pdf>

the alleged conduct occurred in the context of court proceedings, it is likely that B's alleged conduct is sufficiently relevant or connected to the practice or standing of the profession such that CD5 and/or rC8 might be engaged. As such, we are likely to have a regulatory interest in this conduct.

31. The UKLFI Letter at page 20 goes onto assert that Karim Khan KC's claim "The effects of the use of starvation as a method of warfare ... are acute, visible and widely known, and have been confirmed by multiple witnesses, including local and international medical doctors" is false on the basis that it is "inferred" that "acute, visible and widely known" means unreliable media reports and that doctors working in Gaza belong to Hamas are also unreliable. The letter continues "bearing in mind there are numerous mobile telephones in Gaza, there have not been photographs of many emaciated Gazans in the media". There is no indication that the application was based on unreliable media reports nor that he relied on evidence from doctors working for Hamas and it is completely false to state that there had not been photographs of emaciated Gazans and it is misleading and dishonest to make these claims and on such basis claim the ICC application was made on false information. The Respondents acting in their capacity as Barristers, involved in legal proceedings to allege a fellow Barrister of knowingly using false information are duty bound to be scrupulous about accuracy. As Jackson LJ observed in *Wingate v The Solicitors Regulation Authority* [2018] EWCA Civ 366 [100]:

Integrity connotes adherence to the ethical standards of one's own profession. That involves more than mere honesty. To take one example, a solicitor conducting negotiations or a barrister making submissions to a judge or arbitrator will take particular care not to mislead. Such a professional person is expected to be even more scrupulous about accuracy than a member of the general public in daily discourse.

32. The UKLFI Letter states that Hamas and not IDF were restricting aid and killing their own civilians queuing for food, but the Refugee Internal report makes clear Israel has never offered any credible evidence for these claims and they are flatly refuted by UN bodies working on the ground in Gaza⁴⁵. The UKLFI Letter claims that Yoav Gallant when stating "We are imposing a complete siege on **Gaza**. No electricity, no food, no water, no fuel. Everything is closed" had been mistranslated and he really meant "Gaza City". Leaving aside that it is not possible to siege Gaza City without doing the same to Gaza, starving the population of Gaza City would in any event amount to a war crime which supports Karim Khan KC's application to indict.
33. UKLFI's claims that Karim Khan's ICC application is based on false information is thoroughly and objectively dishonest. UKLFI's arguments at best amount to infantile and vexatious claims that are internally inconsistent and fall at the slightest scrutiny, but at worse amount to outright misrepresentation of evidence. The only basis the Respondents are to be given credence and have appeared on countless media platforms to air their lies against Karim Khan KC is the fact that they present themselves as acting in their capacity as member of the Bar. If they merely presented their views as members of the public they would not have been taken seriously, paragraph gC26 of the Code states that: "For the purposes of gC25.8 above, referring

⁴⁵ Untangling the Reality of Famine in Gaza by Refugees International

to your status as a barrister in a context where it is irrelevant but may influence others may constitute abuse of your professional position and thus involve a breach of CD3, CD5.”

34. Israel politicians and leaders have announced a policy of starvation and aid agencies have reported deaths of children from starvation. The Respondents’ denials of war crimes, through reckless misinformation, may obstruct humanitarian efforts and contribute to ongoing violations of international law. The UK, as a signatory to the Genocide Convention, has a legal and moral duty to prevent actions that enable mass harm, not to indulge in inflammatory rhetoric that fuels it. The Respondents’ reckless denial of genocide allegations may perpetuate harm to the Palestinian population, exacerbating an ongoing humanitarian crisis. This is as morally repugnant and racist as Holocaust denial because such speech does not just upset historical victims but assists the continuation of actual ongoing atrocities against current and new victims, most of whom are women and children. The Respondent’s in denying the man made starvation of Gaza Palestinian is discriminatory, racist and seriously offensive.

ADDITIONAL COMPLAINT AGAINST RESPONDENT 2

35. The second Respondent, Jonathan Turner, made a highly insensitive and discriminatory statement in May 2025, claiming that the siege of Gaza increased the life expectancy of Palestinians because they were obese prior to October 2023. This remark, reported by The Guardian on 10 May 2025 (ANNEX 09), was widely condemned as “sickening,” “repulsive,” and “atrocious” by various public figures and organizations⁴⁶. These reactions highlight the statement’s offensive nature, directly breaching CD12, which prohibits unlawful discrimination, victimization, or harassment on grounds including race, ethnic origin, and nationality. The Lancet’s report (2025) confirms “life expectancy in the Gaza Strip decreased by 34.9 years during the first 12 months of the war, about half (–46.3%) the pre-war level of 75.5 years”⁴⁷. Turner’s obesity claim is untrue and breaches CD12 (discrimination) and CD5 (public trust).
36. Turner’s assertion is not merely insensitive but constitutes seriously offensive dehumanization of Palestinians, implying their suffering is a beneficial outcome of Israel’s siege. This aligns with the BSB’s Guidance on the Regulation of Non-Professional Conduct (para 35), which notes that conduct demonstrating a barrister’s attitude toward minoritized groups may indicate future bias, alienating clients and the public, and risking access to justice. As a barrister, Turner’s use of his professional platform to disseminate such falsehoods exacerbates the violation, warranting regulatory scrutiny.
37. It is not possible to conclude that the authors of UKLFI’s inherently weak and misleading complaints to the BSB would be upheld but that rather it was an attempt to abuse the BSB’s complaint process to intimidate and garner media appearances to propagandise and sanitise Israeli war crimes in the full knowledge that the ICC will

⁴⁶ <https://www.theguardian.com/world/2025/may/10/uk-lawyers-for-israel-condemned-over-claim-war-may-reduce-obesity-in-gaza>

⁴⁷ [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(24\)02810-1/abstract#:~:text=ln%20the%20central%20variant%2C%20life,level%20of%2075.5%20years.](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(24)02810-1/abstract#:~:text=ln%20the%20central%20variant%2C%20life,level%20of%2075.5%20years.)

not as a matter of convention appear to defend itself or to point out the obvious falsehoods in the UKLFI claims. Respondent 1, hereinafter referred to as NH, has appeared on numerous mainstream and far right media platforms since publishing the complaint to claim that (1) Karim Khan had used false information in his application; (2) Palestinians were not being subjected to starvation and human rights abuses (3) and that Israel should continue their military actions which target civilians.

ADDITIONAL COMPLAINT AGAINST RESPONDENT 1 - Natasha Hausdorff (NH)

38. In these appearances NH has been unopposed in a dishonest attempt to attack the integrity of the ICC Prosecutor and member of the English Bar by falsely claiming every phrase of his application is made on a false basis and undermine the International Criminal Court and the rule of law. Set out below are three such instances; (A) a BBC interview; (B) appearance before the foreign affairs select committee; and (C) the Piers Morgan Debate.

(A) BBC Interview

39. On 07 February 2025, NH appeared on BBC (<https://www.youtube.com/watch?si=CVbD7k9WmqWZ5281&v=fdGSGMQKG8E&feature=youtu.be>), making statements breaching CD3, CD5, and CD12. At 2:18, she claimed, 'Every phrase of every sentence of Karim Khan's application ... was shown to be false,' despite lacking access to the evidence (para 20), violating rC9.1 (knowingly misleading) and CD5 (diminishing trust). At 5:09, '...by alleging starvation when we can see with our own eyes that those Palestinian civilians are well and healthy,' contradicts ANNEX 6-7 photos (para 40), breaching CD3 (dishonesty) and CD12 (discriminatory conduct). Her denial of jurisdiction (3:29) misrepresents ICJ rulings (para 39), further eroding trust. Below the link are her actual claims made at a BBC interview on 07 February 2025 in italics:

<https://www.youtube.com/watch?si=CVbD7k9WmqWZ5281&v=fdGSGMQKG8E&feature=youtu.be>

2.18

Every phrase of every sentence of Karim Khan's application ... was shown to be false ...

2.58

[ICC] is no longer a court by any common usage of the term as I indicated once jurisdiction is thrown out of the window it becomes a political body ...

3.29

To issue arrest warrants on the basis of this information which have been shown to be false ... it is predicated on this false allegation of starvation, ... it has been shown pretty flatly that every allegation of starvation or famine has been shown to be false

5.09

... by alleging starvation when we can see with our own eyes that those Palestinian civilians are well and healthy and where every allegation of starvation or famine in reports has been discredited including by UN bodies including the Famine Review

Committee (FRC) who have said that the IPC reports that predict famine where implausible and based on incomplete information

5:37

Interviewer - There are plenty of doctors who would deny that who are there and on the ground and are treating people for malnutrition ...

5.43

I would advocate ... read the recent UKLFI paper that has gone through chapter and verse of all those famine review reports and has demonstrated on the basis of publicly available information put out by COGAT which records the volume of aid going into Gaza, the calorie count significantly in excess of NHS guidelines

40. NH's argument about ICC Jurisdiction is premised on misrepresentation, the question of jurisdiction is a matter of settled law: the ICC Pre-Trial Chamber I's decision on 5 February 2021 that the Court could exercise its criminal jurisdiction in the Situation and, by majority, that the territorial scope of this jurisdiction extends to Gaza and the West Bank, including East Jerusalem.
41. The UKLFI letter states "bearing in mind there are numerous mobile telephones in Gaza, there have not been photographs of many emaciated Gazans in the media" and NH in the BBC interview above she states ... *by alleging starvation when we can see with our own eyes that those Palestinian civilians are well and healthy*. NH is dishonest, social media and the mainstream have been flooded with photographs and videos of emaciated and starving babies and children, for example please see ANNEX 10⁴⁸ and 11⁴⁹ which are two mainstream media articles dated March and June 2024 and are solely about the images of starving Palestinian children.
42. Furthermore, NH had a duty to correct the misinformation disseminated during the BBC interview post-broadcast, as required under gC22 of the BSB Code of Conduct, which states that "the ethical obligations that apply in relation to your professional practice generally continue to apply in relation to media comment." Her failure to retract or clarify statements—such as the baseless assertion at 5:09 that "Palestinian civilians are well and healthy" despite photographic evidence (ANNEX 10-11)—compounds the breach of CD3 (dishonesty) and CD5 (diminishing trust). As a barrister, NH was obliged to ensure accuracy in public discourse, particularly after the interview's wide reach, and her silence perpetuates harm to public confidence in the profession and the integrity of international legal processes.
43. NH's oft repeated statement *Every phrase of every sentence of Karim Khan's application ... was shown to be false* is absurdly false given that she is unaware of the contents of Karim Khan's application and it's evidential basis. Further NH is not alleging that the application may be inaccurate or that she has a different view, she is categorically stating it is false knowing full well it means "lying, deceitful, treacherous, unfaithful to; deceptive; spurious, sham, artificial" (AA (Nigeria) v Secretary of State for the Home Department [2010] EWCA Civ 773). The fact that UKLFI are alleging Karim Khan KC of lying and fraud is confirmed in their own

⁴⁸ <https://www.reuters.com/pictures/pictures-gazans-face-threat-famine-2024-06-25/?n=%40>

⁴⁹ <https://edition.cnn.com/2024/03/07/world/gallery/gaza-hunger-malnutrition>

Twitter post which sets out a selective history of Karim Khan KC's ICC application under a heading entitled "Timeline of Deception @IntlCrimCourt (ICC)"⁵⁰ (ANNEX 12). Code of Conduct rC9 2c prohibits a Barrister from making any "allegation of fraud, unless you have clear instructions to allege fraud and you have reasonably credible material which establishes an arguable case of fraud".

44. The Code of Conduct clearly states at paragraph gC22, in relation to "Media Comment", that: "The ethical obligations that apply in relation to your professional practice generally continue to apply in relation to media comment. In particular, barristers should be aware of the following: • Independence: Core Duties 3 and 4 provide that you must not permit your absolute independence, integrity and freedom from external pressures to be compromised. • Trust and confidence: Core Duty 5 provides that you must not behave in a way which is likely to diminish the trust and confidence which the public places in you or the profession."

(B) Foreign Affairs Select Committee

45. On 22 April 2025, during a Foreign Affairs Select Committee hearing⁵¹ (ANNEX 13), NH was asked whether Israel is obeying international humanitarian law in Gaza. She responded that the British Government "have consistently said they do not have concerns about Israel's approach to humanitarian law so far," a statement demonstrably false. The committee chair, Rt Hon Emily Thornberry MP, interjected with evident dismay, stating, "Oh no, no, no, nah, nah, nah, no, no, no. That is an extraordinary allegation," reflecting significant public and professional shock. This reaction underscores the breach of CD5 (behaviour that diminishes public trust), as NH's misrepresentation eroded confidence in her professional credibility and the Bar. In March 2024 the chair of the Foreign Affairs Select Committee stated that the UK government received internal legal advice that Israel had broken international humanitarian law⁵² and in September 2024 Foreign Secretary David Lammy suspended thirty of 350 military export licenses to Israel after concluding there was a "clear risk" they might be used to commit serious violations of international law⁵³.
46. NH campaigns consistently to deny and even defend the systematic atrocities committed against Palestinians through clear lies and misrepresentations further breaches CD5. This conduct alienates minoritized groups, risking access to justice, and aligns with the BSB's Anti-Racist Strategy 2024-2027's concern about attitudes toward vulnerable populations.
47. As can be seen from the media appearance set out below when NH's misrepresentations are exposed she claims she does not represent the Israeli Government but she is merely acting as a member of the English Bar. NH has no legitimacy in her widely acknowledged false representations but rather uses her professional standing as a Barrister regulated by the BSB, which prohibits

⁵⁰ <https://x.com/UKLFI/status/1862721930547064991>

⁵¹ <https://committees.parliament.uk/oralevidence/15750/pdf/>

⁵² <https://www.theguardian.com/world/2024/mar/30/uk-government-lawyers-say-israel-is-breaking-international-law-claims-top-tory-in-leaked-recording>

⁵³ <https://www.ft.com/content/bac169fb-4d28-4729-85e8-a13a197b0368>

misrepresentation, lies and dishonesty, in order to deny war crimes and starvation against the civilian population of Palestine. This practise brings the Bar to disrepute.

48. Below are excerpts from NH's most recent appearance on the Piers Morgan Debate, PM refers to Piers Morgan and DS refers to the other guest Dave Smith. Before each excerpt is a summary in capital of the way NH's speech is misleading or offending followed by time marked transcript of the programme. Many of the summaries' are self-explanatory however those which require further context have an Asterix and are set out at the end of the transcript.

(C) Piers Morgan Debate 3 Jun 2025

https://www.youtube.com/watch?v=5MpujQ_y3RU&t=3570s&ab_channel=PiersMorganUncensored

NH FALSELY CLAIMS THAT REPORTS OF ISRAEL IMPOSED AN AID EMBARGO ARE FALSE AND THAT VIDEOS OF GAZAN'S STARVING TO DEATH ARE HAMAS PROPAGANDA

9.12

NH - false information and there is a great deal of it it starts with this notion that Israel imposed an entire blockade on aid

...

9:55

the reality here is that there is no Israeli imposed starvation on the Gaza Strip that there has been facilitated over the course of this but that is simply not true

...

13:13

PM - why do they all look like they're starving to death and are prepared to risk actually dying to get at food

...

13:19

PM - ... I'm seeing with my own eyes...

NH - which is Hamas propaganda which you must accept as

PM - No no it's actually footage I'm watching

...

NH CLAIMS THE DOCUMENTED ATROCITIES OF ISRAELI CONTROLLED FORCES SHOOTING DEAD 31 GAZANS AT AID DISTRIBUTION SITES ARE FALSE AND FALSELY CLAIMS THAT THERE IS DRONE FOOTAGE SHOWING THAT THE KILLINGS WERE CARRIED OUT BY HAMAS*

14:03

NH - your assessment is being based on misinformation like these false reports we've had today of Israel shooting 31 Palestinians attempting to get to food ... it was entirely false

...

15:02

NH - It was Hamas, we have the drone footage ...

...

NH CLAIMS SHE IS NOT REPRESENTING THE VIEWS OF THE ISRAELI GOVERNEMENT OR DEFENDING IT BUT IS ONLY SEEKING TO DEFEND THE “RULE OF LAW”

25:16

NH - I'm here as a lawyer ... the Israeli government ...

PM - and you're here to defend it right

NH - no I'm here to defend the rule of law and the weaponization of international law

NH PURPORTS TO APPLY THE RULE OF LAW BY CLAIMING IT IS DANGEROUS PROPAGANDA TO CLAIM ISRAEL IS COMMITTING GENOCIDE OR STARVING CHILDREN AND THAT UNDER INTERNATIONAL LAW ILLEGAL SETTLEMENTS ARE NOT ILLEGAL AND ANY USE OF THE TERM OCCUPATION, ETHNIC CLEANSING, GENOCIDE AND APARTHEID ARE ANTISEMITIC BLOOD LIBELS*

25.33

NH. (it is dangerous propaganda) to call Israel a committer of genocide or saying it is starving children ...

When PM points out that two former Israeli PM's have stated Israel is committing war crimes she dismisses it as internal politics

26.53 PM states that last week Israel announced 22 new illegal settlements, and asks “as a lawyer given your adherence to the rule of law you would condemn that?”

27:06

NH - ... The notion of these so-c called led illegal settlements is a misnomer it's not a legal term it's a political term and it is part and parcel of the misapplication of international law to the status of these territories ... these blood libels occupation, ethnic cleansing, genocide and apartheid are all part of the propaganda ... because all of the evidence goes in completely the opposite direction

NH FALSELY CLAIMS THAT THE ESTIMATED 20,000 CHILDREN KILLED IS FALSE, WHEN ASKED HER BASIS FOR THE CLAIM SHE STATES IT IS BECAUSE HAMAS CASUATY FIGURES ARE FALSE BECAUSE THEY ARE AN INTERNATIONALLY PROSCRIBED ORGANISATION, WHEN PUSHED SHE STATES IT IS BECAUSE HAMAS THEMSELVES HAVE REVISED THEIR FIGURES

27:31

NH - In terms of Israel's compliance with the laws of armed conflict and its um the amount of steps that Israel takes unprecedented in the history of armed conflict and military

27:42

PM - that's just a load of bullshit, I'm sorry it just is ... which other war in recent times where have you had half the population is under 18 and you killed 20,000 kids

NH - those figures are Hamas figures ... Hamas figures are inflated ...

...

NH – because Hamas lies it is an internationally proscribed terrorist organization ...

28:20

PM - some might think you're lying because you say on one hand I don't know how many children have been killed but on the other hand that's a blood libel if you say we've killed any of them but on the other hand ...

NH - that's not what I said no

28:32

PM - but on the other hand you know all about the ratios and you know how humane Israeli forces are being but you don't know how many they're killing

...

28:44

PM - How do you know they're false? you don't know how many have been killed

28:50

NH - because Hamas has even itself revised those figures down and acknowledged that they are false

The other guest points of the dishonesty in this argument, points out that Hamas revising casualty figures down supports their credibility and that it is ludicrous that two former PM of Israel have fallen for Hamas propaganda.

NH then falsely claims the ICC has no jurisdiction and their arrest warrants are unlawful due to the principle of complementarity and that every claim upon which Karim Khan made the application was false. She states that claiming Israel is targeting children is a blood libel.

ON 24 MAY 2025 NINE OF DR ALAA AL-NAJJAR'S CHILDREN WERE KILLED IN AN AIRSTRIKE ON HER HOME, NH CASTS DOUBT ON THE EVENT FALSELY CLAIMING IT IS BASED ON CONFLICTING REPORTS, "ARTIFICIALLY GENERATED IMAGERY" AND THEN BLAMES THE VICTIMS FOR BEING THERE IN THE FIRST PLACE*

38:17

PM - last week nine out of 10 children in one home where two doctors reside was killed in an air strike

NH - it is remarkable that that has been based only on the basis of hearsay information

PM - wait a minute you don't believe that those children were killed

NH - I have seen conflicting accounts and I want that story to be properly investigated before the international media runs with it. I have ...

38:39

PM - You think those two parents one of whom I think operated on one of the children ... do you think that those two doctors the parents they just made it up, nine of their 10 children had been blown to pieces by an Israeli airstrike

38:53

NH - if this is true why on earth was artificially generated imagery used to promote this story when it first happened

39:05

PM - I got to say I think what you just said about that family is despicable, I'm sorry it's despicable ... you talk about blood libel, you talk about lying you talk about promoting propaganda and here you sit here as a lawyer and you say that you do not believe those nine children were killed

39:23

NH - I didn't say that you're putting words in my mouth I said

PM - do you believe it or not

NH - I said that there were conflicting accounts and it needs to be investigated

39:30

PM - do you believe it, ... the parents said nine of their 10 children were killed do you believe them or not or did those two doctors make it up

NH – they haven't said that directly as far as I have seen I have seen second hand accounts and hearsay but it's important to ask why are these civilians still there? why is it that you know

PM - it's important to ask whether you believe that family have lost nine of their 10 children

39:49

NH - I want to know why the international community ...

NH BLAMES THE FACT THAT MORE JOURNALISTS HAVE BEEN KILLED THAN IN ANY OTHER WAR ON THE FALSE CLAIM THAT JOURNALISTS IN GAZA ARE HAMAS MEMBERS*

39:54

PM - you don't know and this goes to the point that I would say about Israel generally now in in this war now israel says they don't believe anything everything every story that comes out about the deaths of civilians in Gaza someone will pop up representing the Israeli government saying "Ah it's propaganda it's not true I've heard it's not right I've heard it didn't happen." And the reason you can get away with it frankly is because you won't allow the Israeli government won't allow I keep don't want to keep putting you in the government but the is but you you defend them the Israeli government refuses to allow international journalists to get in there and do their job and verify whether any of these things are actually happening when you say they didn't happen

40:43

NH - I can help you with why I've been there in September and seen a great deal of the Hamas terror infrastructure with my own eyes including the fact that when we were in Rafah every second building was being used by Hamas

...

PM questions NH's claim that they want to prevent journalists from being harmed and points out more journalists in Palestinian journalists than in any war in modern history

42:18

NH - Hamas members wearing press vests are not journalists ... and reason number three

PM - so none of them are journalists ...

...

NH - Hamas members are all in ... those are

PM - every single dead Palestinian journalist is a member of Hamas is that your position, that is bullshit

NH - Pier's you are misrepresent misrepresenting every word ...

WHEN IT IS PUT TO NH THAT SHE CANNOT TELL THE TRUTH ABOUT ISRAEL BECAUSE SHE REPRESENT'S ISRAELS POSITION SHE DENIES THIS AND CLAIMS HER VIEWS MERELY THE VIEWS OF AN INDEPENDENT MEMBER OF THE BAR

47:39

DS - bottom line here is that Israel is doing this to the civilian population of Gaza and nobody nobody who's being honest doesn't believe that the only reason Israel won't let journalists in there is because they

47:50

don't want the world to see what they're doing to these people period that's the reason and everybody including you knows it, the problem here is that you're not allowed to tell the truth, you're Israel's lawyer

NH – No I am not ...

DS - and you got to defend them no matter what ...

NH - sorry I'm an independent member of the English bar I am not instructed ...

...

PM - what's the name of your, name of your organisation?

48:47

NH - let me be perfectly clear I am not in the employ of anyone associated with the state of Israel

PM - what's the name of your organization?

NH - UK lawyers for Israel began as a voluntary association of lawyers looking for the proper application of law to Israel Israelis and combating anti-Semitism

...

NH BLAMES THE ONGOING ATROCITIES ON THE “INTERNATIONAL COMMUNITY” BECAUSE THEY DO NOT ALLOW GAZANS TO LEAVE THE WAR ZONE, WHEN IT IS ISRAEL THAT PREVENTS THEM FROM LEAVING*

49:03

NH - remarkable we are having a different conversation this is a circus and I am actually seeking to address practical questions and including the disgusting situation that we are now left with where the international community has said that Palestinian civilians must uniquely be kept in a war zone may not be permitted to leave that is what uh I am hearing being advocated for consistently so that they can be continued to be used not just as human shields by Hamas but as human sacrifices

NH DESCRIBES THE CONSEQUENCE OF THE CONFLICT AS JEWS BEING GUNNED DOWN AND BURNED IN THE STREET AND THAT PALESTINIANS SUFFER AS A RESULT OF HAMAS “SUPPRESSION, REPRESSION TORTURE AND THE STEALING OF AID”

49:33

NH - dragging this conflict out the tragedy of this misinformation and this propaganda is not just that Jews are being gunned down and burned in the street it is also that Palestinian civilians are continuing to suffer is as a result of this war but also of Hamas uh suppression repression torture and the stealing of aid which has been well documented the fact that people uh like the two of you will continue to put out this false information to perpetuate this conflict

49:58

DS – you are the only one putting out false information here

50:03

NH- what have I said that's false

PM - I didn't think anyone could be more disingenuous than the UK ambassador I got to say Natasha you you've got right up there you've crossed that little bar haven't you

NH CLAIMS THAT THE GENOCIDAL STATEMENTS OF ISRAEL'S MOST POWERFUL POLITICIANS ARE IRRELEVANT TO ONGOING WAR CRIMES

50:56

PM - ...I think people like Smotrich are genocidal maniacs and I think anyone on the pro-Israeli side particularly a lawyer who can listen to what Smotrich said last week and not understand that he is actually promoting war crimes out of his very mouth

51:09

NH - we haven't discussed Smotrich and I'm not particularly interested in what he has to say because it's ...

PM - well he's the finance minister of the Israeli government he's the most he's one of the three most powerful people in the country

51:20

NH - he clearly doesn't have an input to the war cabinet's policy or how this campaign has been run

...

51:37

it's like saying Goebbels didn't have any control over policy therefore it doesn't matter what he said

NH DENIES UP TO 60,000 HAVE BEEN KILLED ON THE BASIS THAT THE ISRAELI AMBASSADOR STATED ON 30,000 HAMAS MEMBERS HAVE BEEN KILLED, SHE REPEATS THAT SHE IS NOT REPRESENTING THE ISRAELI BUT THE PROPER APPLICATION OF THE LAW

52:12

NH - ... had put in place were unprecedented that it wasn't just adhering to international humanitarian law the law of armed conflict but in every respect was going far above the requirements including in taking precautions to prevent civilian ...

PM - how have they been so careful have they managed to destroy 70% of Gaza and killed I think it's 50 to 60,000 people

NH - those again are Hamas figures which are ... not accurate

52:38

PM - what's the Figure?

NH - well you heard I think from the ambassador 30,000, have you, killed 30,000

52:44

PM - there you go with you again

NH - I think there's have been some misbriefing in this

PM - well you seem to be speaking on behalf of the government so

NH - no I'm speaking on behalf of the facts and the proper application of law which I appreciate neither of you seem to be particularly interested in uh but I will maintain my interest

NH FALSELY CLAIMS THAT THE CASUALTY NUMBERS ARE FROM HAMAS SHOOTING THEIR OWN CITIZENS AND FALSELY CLAIMS ISRAELI OPERATIVES DO NOT TARGET GAZANS AT AID CENTRES AND FALSELY CLAIMS THAT DRONE FOOTAGE SHOWS THAT THIS IS COMMITTED BY HAMAS

52:56

NH - ... in particular the fact that these casualty figures by Hamas do not take account of how these people have said to have died. We know Hamas are shooting their own civilians that false report of Palestinian civilians at aid centres being targeted by Israel that was in fact Hamas shooting them we have the drone and we have ... consistent accounts

PM - the investigation is still going on but of course it's an Israeli investigation which will doubtless exonerate the Israeli forces

53:26

NH - we also know that Palestinian civilians are killed by indiscriminate missiles Palestinian Islamic Jihad and Hamas rockets when they fall short in the Gaza Strip they don't fall with a proportionality analysis they don't fall precisely in the way that Israeli strikes are conducted with warnings

NH FALSELY CLAIMS THAT INTERNATIONAL ORGANISATIONS, THE UN AND THE ICJ AND ICC ARE INVOLVED IN THE MANUFACTURE OF DISINFORMATION*

PM - if you're doing everything so magnificently by the book why is it that so many allies of Israel are now queuing up and former prime ministers of Israel are queuing up to condemn it are they all utterly deluded

53:54

NH - no there are two particular reasons for this the first is what we have seen with the manufacturing of this disinformation that comes out of Gaza from Hamas that is promoted by NOS's uh formerly respected like Amnesty International, Human Rights Watch that is then in turn reported by UN special rapporteur that finds its way into security council resolutions or general assembly resolutions that then in turn makes it up to institutions like the ICC and the ICJ and then once that circle of disinformation is complete these matters are often re-reported by the NOS's that started this disinformation cycle in the first place that's reason number one reason number two is because of the mode in which the international media have conducted their reporting of this conflict we have the Al Ali hospital as a prime example on the 17th of October 2023 immediately it was reported that this was an Israeli air strike that was false peers just like the reports of Israel targeting Palestinian civilians trying to get aid were false I urge you to use a little bit of logic here to assess what on earth Israel's objective could be targeting civilians or hitting

55:04

hospitals like this willy-nilly which it does not do without good reason because Hamas has used them as command and control centres and when it provides warnings to enable uh civilians to evacuate why on earth would Israel be targeting Palestinian civilians when it has been seeking from the get-go to evacuate them to provide humanitarian corridors which it has defended even though Hamas has fired onto these civilians as they seek to flee areas

NH IS CAUGHT LYING IN CLAIMING SHE WENT AND SAW THAT EVERY SECOND HOME IN RAFAH WAS HAMAS TERROR INFRASTRUCTURE

40:43

NH - I can help you with why I've been there in September and seen a great deal of the Hamas terror infrastructure with my own eyes including the fact that when we were in Rafah every second building was being used by Hamas

...

55:36

NH - where Hamas has embedded its terror infrastructure in these civilian areas in mosques schools hospitals and every second house when I was in Rafah that we saw that is the truly ...

55:45

PM - How many houses did you see ... How many houses did you see?

NH - well many of them were destroyed

PM - you said every every second house you

55:51

NH - Saw 10's

PM - you saw 10 houses

NH - no tens plural the matter is

PM - hang on how many but how much you said every second house so how many did you see

NH - no every second house

PM - how many houses did you go into

NH - it doesn't matter

PM - it does matter you've made a statement you said every second house how many did you go into

56:07

NH - we, there were the houses were not there

56:13

PM - you know how many houses you went into?

NH - tens

PM - well what 10, 15, 20

NH - Piers you're missing the point here

PM - no no I know the point is you made a claim I've simply asked you to give me a number, numbers are not your strong point I know that but I imagine you remember how many houses you went into no

56:30

NH - we saw destroyed houses in the Rafah area because Hamas has been using these houses as part of its terror infrastructure

PM - how do you know

NH - because they make clear their tactic

PM - said you went into them

56:43

NH - and you again you're putting words in my mouth if you would listen I think things would be a lot clearer um Hamas have made

56:50

PM - you know what was inside houses even though you didn't go inside them and they were all obliterated

NH - you know I couldn't go inside them because they were booby trapped by Hamas

56:56

PM - you didn't go inside them and they were all destroyed but you knew they were all full of Hamas stuff

NH - what I did see is drone footage that ... went into these houses

PM - that demonstrated you didn't go into the houses you didn't see any Hamas stuff in there but you saw drone footage the idea NH - well I must make it very clear I'm sorry it's just flannel isn't it

NH - you always take Hamas's word for it so listen to what they say

57:19

PM – I wouldn't take your word for it sounds like a lot of old bull shit again

57:57

DS - ... the reason why two former Israeli prime ministers have come out and said that Israel is committing war crimes in Gaza is because Israel is committing war crimes in Gaza the reason why Israel will not let journalists into Gaza is because Israel is committing war crimes in Gaza and the reason why Israel is killing uh Palestinian civilians in Gaza and the reason why they're building up more settlements in the West Bank is because as Smotrich has said as Katz uh the defence minister has said this week and as Benjamin Netanyahu has said for years and years and years their plan is greater Israel they want Gaza and the West Bank they call it Judea and Samaria, they believe that it's rightfully Israel's Benjamin Netanyahu showed up to the United Nations a couple weeks before October 7th with a map where it was all Israel that's the bottom line it's why they've been controlling these territories since 1967 see the truth makes a lot more sense ... and by the way you know that Israel has nuclear weapons but you won't say it on this program because you're not in the business of telling the truth about this conflict you're in the business of defending Israel which is fine that's what you want to do but all three of us know

49. NH CLAIMS THE DOCUMENTED ATROCITIES OF ISRAELI CONTROLLED FORCES SHOOTING DEAD 31 GAZANS AT AID DISTRIBUTION SITES ARE FALSE AND FALSELY CLAIMS THAT THERE IS DRONE FOOTAGE SHOWING THAT THE KILLINGS WERE CARRIED OUT BY HAMAS .

49.1 On 01 June 2025 31 Palestinian civilians were killed by Israeli fire as they went to receive food at an aid distribution point set up by an Israeli-backed foundation in Rafah Gaza, according to witnesses, and a hospital run by the Red Cross confirming it was treating many wounded⁵⁴. The Drone footage NH is referring to was released by the IDF hours after the Rafah massacre, but even the IDF did not claim this was related to Rafah but an entirely separate incident in Khan Yunis some five miles away⁵⁵ ⁵⁶ (ANNEX 14). NH is not telling the truth in stating there is drone footage showing the 31 Palestinians massacred in Rafah were killed by 'Hamas', it is simple fabrication.

50. NH PURPORTS TO APPLY THE RULE OF LAW BY CLAIMING IT IS DANGEROUS PROPAGANDA TO CLAIM ISRAEL IS COMMITTING GENOCIDE OR STARVING CHILDREN AND THAT UNDER INTERNATIONAL LAW ILLEGAL SETTLEMENTS ARE NOT ILLEGAL AND

⁵⁴ <https://www.theguardian.com/world/2025/jun/01/palestinians-gunned-down-while-trying-to-reach-food-aid-site-in-gaza-hospital-says>

⁵⁵ <https://www.abc.net.au/news/2025-06-04/news-verify-gaza-aid-deaths-timeline/105372210>

⁵⁶ <https://www.aneews.com.tr/middle-east/2025/06/02/gaza-media-office-debunks-israeli-video-claiming-to-clear-forces-of-killing-aid-seekers>

ANY USE OF THE TERM OCCUPATION, ETHNIC CLEANSING, GENOCIDE AND APARTHEID ARE ANTISEMITIC BLOOD LIBELS.

50.1 Israeli settlements in the Israeli-occupied Palestinian territories of the West Bank and the Gaza Strip, as well as in the Syrian Golan Heights, are illegal under international law they are in violation of Article 49 of the Fourth Geneva Convention, and in breach of international declarations. In a 2024 ruling by the International Court of Justice (ICJ) relating to the Palestinian territories, the court reaffirmed the illegality of the settlements and called on Israel to end its occupation, cease its settlement activity, and evacuate all its settlers⁵⁷. Furthermore, the Supreme Court of Israel has repeatedly ruled that Israel's presence in the West Bank is in violation of international law.⁵⁸

50.2 The International Court of Justice (ICJ),⁵⁹ the UN General Assembly,⁶⁰ and the UN Security Council⁶¹ all regard Israel as the occupying power for the territories. In 1948 Israel ethnically cleansed over 500 Arab villages of over seven hundred thousand Palestinians, this was also well documented but has only become acknowledged as a fact by Israeli Zionist academics in the 1980's⁶².

⁵⁷ Gross, Aeyal (19 July 2024). "The ICJ Just Demolished One of Israel's Key Defenses of the Occupation". Haaretz.

⁵⁸ Tomer Zarchin, If Israel is not occupying the West Bank it must give up land held by the IDF, Haaretz, 9 July 2012: 'For 45 years, different compositions of the High Court of Justice stated again and again that Israel's presence in the West Bank violates international law, which is clearly opposed to Levy's findings.'

⁵⁹ "Legal Consequences of the Construction of a Wall in the Occupied Palestinian Territory". International Court of Justice. 9 July 2004

⁶⁰

<https://web.archive.org/web/20171010091056/https://unispal.un.org/DPA/DPR/UNISPAL.NSF/47D4E277B48D9D3685256DDC00612265/C2A00B6E6E1C02CF8525798E00578F75>

⁶¹ Strongly deplores the continued refusal of Israel, the occupying Power, to comply with the relevant resolutions of the Security Council and the General Assembly; Ruth Lapidoth; Moshe Hirsch (1994). The Jerusalem Question and Its Resolution: Selected Documents. Martinus Nijhoff Publishers. pp. 351-. ISBN 978-0-7923-2893-3

⁶² Bronner, Ethan. "The New New Historians", The New York Times, 9 November 2003

50.3 According to a United Nations Special Committee,⁶³ Amnesty International⁶⁴, Human Rights Watch⁶⁵ and other experts⁶⁶, Israel is committing genocide in Gaza against the Palestinians. In November 2023 in *The Lancet* and in February 2024 in *BMJ Global Health*⁶⁷, multiple doctors detailed how the targeting of Gazan health infrastructure and medical personnel coupled with Israeli politicians' rhetoric amounts to genocide. The legal scholar Matiangai Sirleaf has written that Gaza "is the first 'live-streamed' genocide in history"⁶⁸

50.4 Leading Palestinian, Israeli (Yesh Din (July 2020), and B'Tselem (January 2021)), international human rights groups (Human Rights Watch (April 2021) and Amnesty International (February 2022)), hundreds of NGO's and UN bodies (2007 report of UN Special Rapporteur, 2017 ESCWA Report, 2022 report of UN Special Rapporteur, 2022 special committee on Israeli practices, 2022 report of new UN Special Rapporteur) have said that the totality and severity of the human rights violations against the Palestinian population in the occupied territories, and by some in Israel proper, amount to the crime against humanity of apartheid.

⁶³ "A genocide is unfolding before our eyes: History will not forgive our inaction, UN Special Committee warns General Assembly 4th Committee report". Question of Palestine. Archived from the original on 10 April 2025. Retrieved 9 April 2025. Our report leaves no room for ambiguity. A genocide is unfolding before our eyes. Failing to act now—failing to put an end to this atrocity crime— will tear apart the very foundation of the international rule of law we have collectively built to protect peace, security, and the well-being of all. Our inaction today is setting a perilous precedent for tomorrow. Think about it.

⁶⁴ Amnesty International report 2024, p. 13: "This report focuses on the Israeli authorities' policies and actions in Gaza as part of the military offensive they launched in the wake of the Hamas-led attacks on 7 October 2023 while situating them within the broader context of Israel's unlawful occupation, and system of apartheid against Palestinians in Gaza, the West Bank, including East Jerusalem, and Israel. It assesses allegations of violations and crimes under international law by Israel in Gaza within the framework of genocide under international law, concluding that there is sufficient evidence to believe that Israel's conduct in Gaza following 7 October 2023 amounts to genocide."

⁶⁵ Extermination and Acts of Genocide: Israel Deliberately Depriving Palestinians in Gaza of Water (Report). Human Rights Watch. 19 December 2024. Archived from the original on 9 February 2025. Retrieved 20 January 2025. Israeli authorities' and forces' actions to deprive the population of Gaza of access to water amount to acts of genocide under the Genocide Convention and the Rome Statute of the International Criminal Court. Specifically, their actions amount to deliberately inflicting conditions of life calculated to bring about the physical destruction of the Palestinian population in Gaza. Genocidal intent may also be inferred from Israeli authorities' and forces' continued actions to deprive Palestinians in Gaza of water, despite clear data and warnings from the United Nations since October and orders from the International Court of Justice calling for the provision of water since January, alongside Israeli authorities' statements, and therefore these acts may amount to the crime of genocide.

⁶⁶ "Rights expert finds 'reasonable grounds' genocide is being committed in Gaza". UN News. United Nations. 26 March 2024. Archived from the original on 28 March 2025. Retrieved 2 April 2025.

"UN Special Committee finds Israel's warfare methods in Gaza consistent with genocide, including use of starvation as weapon of war". OHCHR. 14 November 2024. Archived from the original on 8 May 2025. Retrieved 13 May 2025.

"'It Is Important to Call a Genocide a Genocide,' Consider Suspending Israel's Credential as UN Member State, Experts Tell Palestinian Rights Committee". UN News. United Nations. 31 October 2024. Archived from the original on 5 November 2024.

"UN experts accuse Israel of genocidal acts and sexual violence in Gaza". BBC News. 14 March 2025. Archived from the original on 15 March 2025.

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<https://web.archive.org/web/20240901173445/https://www.nytimes.com/2024/08/02/world/middleeast/gaz-a-doctors-medical-workers-israel.html>

⁶⁸ <https://academic.oup.com/ijtj/article/18/1/162/7681852?login=false>

50.5 Blood libel refers to medieval false accusations that Jewish Rabbis were using the blood of Christians in religious rituals. NH's accusation of legal bodies and experts holding Israel to account for undeniable war crimes is seriously offensive, not only does it amount to undermining the rule of law but is akin to Holocaust denial by denying the suffering and oppression of millions of Palestinians and by seeking to prevent accountability by labelling careful and erudite legal processes as anti-Semitic blood libel. It is also seriously offensive as it uses the historical suffering of the Jewish people to enable and perpetuate the systematic persecution and suffering of the Palestinians people.

51. ON 24 MAY 2025 NINE OF DR ALAA AL-NAJJAR'S CHILDREN WERE KILLED IN AN AIRSTRIKE ON HER HOME, NH CASTS DOUBT ON THE EVENT FALSELY CLAIMING IT IS BASED ON CONFLICTING REPORTS, "ARTIFICIALLY GENERATED IMAGERY" AND THEN BLAMES THE VICTIMS FOR BEING THERE IN THE FIRST PLACE.

51.1 On 24 May 2025 the BBC carried an article⁶⁹ (ANNEX 15) about the event wherein a video showing small burned bodies being lifted from rubble was verified, the article confirmed that on that day the IDF had carried out over 100 strikes in the civilian area of Khan Younis where Dr Alaa Al-Najjar's family resided. The BBC confirmed the death's with the Director of Health Ministry, British Surgeon Dr Greame Groom, another doctor Youssef Abu al-Rish and relative Youssef al-Najjar. No reputable news organisation has cast doubt on the event not least on the basis of "artificially generated imagery".

51.2 The show which NH has appeared on has had 1,653,544 views and it is very likely that Dr al-Najjar or her relatives would have been made aware that NH a British Barrister who did not know her or have any reason to harass and discriminate against her other than the fact that she is Palestinian. NH is not just seriously offensive to the al-Najjar family but to any right minded individual. The BSB Guidance on the regulation of non-professional conduct⁷⁰ states:

34. ... We may have a regulatory interest in this conduct, even if it occurs in a non-professional context, and this includes conduct which is seriously offensive towards others or conduct which is dishonest, discriminatory, victimising or harassing.

35. We may have a regulatory interest in conduct which is discriminatory, for example, because conduct which demonstrates a barrister's attitude towards people from certain groups (particularly minoritised and/or vulnerable groups) might indicate how they will interact with people from that group in the future, including how they may provide legal services to them. Such conduct might also alienate clients, future clients, and members of the public who identify as members of that group. This may make them feel uncertain about engaging with the barrister and/or the profession or trusting that the barrister and/or the profession will act in their best interests. This could be seen as a risk to access to justice, and it is therefore likely to be in the public interest to regulate such conduct.

⁶⁹ <https://www.bbc.co.uk/news/articles/c0eq9lq7xr1o>

⁷⁰ <https://www.barstandardsboard.org.uk/static/e803d194-972c-43b4-84bf162568cee383/60838a0a-904d-4a15-92af9e236b2ed1a2/Guidance-on-the-regulation-of-non-professional-conduct-September-2023.pdf>

52. NH BLAMES THE FACT THAT MORE JOURNALISTS HAVE BEEN KILLED THAN IN ANY OTHER WAR ON THE FALSE CLAIM THAT JOURNALISTS IN GAZA ARE HAMAS MEMBERS.

52.1 Since the onslaught Israel has banned Journalists from entering Gaza whilst simultaneously targeting Journalists in Gaza in what many believe is a macabre policy of preventing the world from witnessing an ongoing campaign of genocide and ethnic cleansing. Irene Khan, the UN's special rapporteur on the promotion and protection of the right to freedom of opinion and expression, said Israel had "spread disinformation about journalists being linked to militants" and failed to meet the "burden of proof" to make such claims.⁷¹

52.2 Israel has not claimed all the journalists it had killed or even most were members of Hamas, where specific allegations have been made by the IDF it has been alleged that some journalists worked for Hamas affiliated media. The Guardian reported "Numerous legal experts said this was a troubling position. While there may be particular individuals who engaged in both journalism and combat activities, they said, the suggestion that everyone working for a media organisation was a militant failed to distinguish between combatants and civilians."⁷² NH claiming journalists are legitimate targets of war is false and seriously offensive by promoting the war crime of targeting journalists.

53. NH BLAMES THE ONGOING ATROCITIES ON THE "INTERNATIONAL COMMUNITY" BECAUSE THEY DO NOT ALLOW GAZANS TO LEAVE THE WAR ZONE, WHEN IT IS ISRAEL THAT PREVENTS THEM FROM LEAVING.

53.1 Gaza is landlocked inside Israel with just a tiny crossing with Egypt, it is home to two million Palestinians who were ethnically cleansed from Israel in 1948. Gaza had been occupied by Israel since 1967 who since the 90's has imposed restrictions on movement and goods⁷³ and since 2005 had imposed a complete blockade preventing Palestinians from entering or leaving, by land, sea or air. Gaza is the most densely populated territories on earth with over two million in a 141 square mile area. In 2010 PM David Cameron described Gaza as a "prison" and now Israel's complete control over movement of Gazan's and daily bombing and starvation within the areas of their movement are leading to more and more experts calling it a concentration camp⁷⁴.

53.2 In The Guardian, global health expert Devi Sridhar wrote there was no precedent to the starvation in Gaza stating there had never been another conflict in history "that

⁷¹ <https://www.theguardian.com/world/article/2024/jun/25/grey-zone-how-hamas-linked-journalists-legitimate-targets>

⁷² <https://www.theguardian.com/world/article/2024/jun/25/grey-zone-how-hamas-linked-journalists-legitimate-targets>

⁷³ <https://unctad.org/publication/preliminary-assessment-economic-impact-destruction-gaza-and-prospects-economic-recovery>

⁷⁴ <https://www.jewishvoiceforlabour.org.uk/article/creating-the-gaza-concentration-camp-and-then-bombing-it/>

used bombing, snipers, starvation all at once with such intensity".⁷⁵ NH blaming the international community for preventing Gazans from leaving when the international community has no control over Gaza and Israel has complete control demonstrates a gross negligence toward factual accuracy with the effect of exonerating Israel's irrefutable war crimes against Palestinians.

54. NH FALSELY CLAIMS THAT INTERNATIONAL ORGANISATIONS, THE UN AND THE ICJ AND ICC ARE INVOLVED IN THE MANUFACTURE OF DISINFORMATION

54.1 Ms Hausdorff undermines the rule of law by presenting a fictitious and incredible depiction on how the ICJ and ICC base their decisions on Hamas misinformation and undermines the courts authority. NH damages confidence in the international legal system and politicises the court's judgements, which has damaging implications for the rule of law and the ability and power of the court to act to uphold international law in the future.

54.2 Such conduct is contrary to Code CD5 according to BSB guidance:

Comments about judges, the judiciary, or the justice system which involve gratuitous attacks or serious criticisms that are misleading and do not have a sound factual basis.⁶ Comments of this nature may be a breach of CD1, CD3, CD5, rC8 and/or rC9.

55. NH IS CAUGHT LYING IN CLAIMING SHE WENT AND SAW THAT EVERY SECOND HOME IN RAFAH WAS HAMAS TERROR INFRASTRUCTURE.

55.1 NH is clearly recorded as saying "I've been there in September and seen a great deal of the Hamas terror infrastructure with my own eyes including the fact that when we were in Rafah every second building was being used by Hamas", however when the statement is revealed to be implausible she states did not go into the buildings as they were destroyed because they contained terror infrastructure. When it is put to her that she is contradicting herself as she earlier had said she went into the houses she states "again you're putting words in my mouth" however she offers no alternative explanation for her clear statement and she does this on other occasions e.g. see 39:17 of the debate. NH is then asked how she knows every second house had terror infrastructure she implausibly states Hamas have stated they are; and when that is questioned she states she saw drone footage.

55.2 NH's claims to have first experience in verifying how terror infrastructure is embedded in the homes of one million Gazans unravel under scrutiny to the point where she denies having visited the buildings or even having said that. However NH has made clear in the Home Affairs Select Committee meeting on 22 April 2025 (ANNEX 13 referred to above) where she is recorded as saying⁷⁶:

In my time on the ground in Gaza in September, when I went in as part of a military expert panel, I could see that civilian houses were booby-trapped—at least in Rafah, it

⁷⁵ <https://www.theguardian.com/commentisfree/2024/mar/06/colleagues-starvation-gaza-no-precedent-famine>

⁷⁶ <https://committees.parliament.uk/oralevidence/15750/pdf/>

seemed that more or less every house, or every second house, that we were encountering had been booby-trapped by Hamas.

55.3 It is apparent to anyone watching NH's appearances that she is less than truthful and her only claim to legitimacy, as she always reminds the viewer, is that she is only acting as an independent member of the Bar who it is assumed must tell the truth. NH is using her profession to gain legitimacy for widely discredited Israeli justifications for abuses and for the purpose of bringing detriment to Karim Khan KC, Palestinians and the rule of law. Paragraph 38 of The BSB Guidance on the regulation of non-professional conduct⁷⁷ states:

Whilst the ability to identify somebody as a barrister is not a necessary ingredient for us to have a regulatory interest in non-professional conduct, it is likely to strengthen the link between the conduct and the profession. This is because, by virtue of being identifiable as a barrister, there may be a greater risk of the conduct diminishing public trust and confidence in the barrister or in the profession. This is also likely to include situations in which a barrister uses their status as a barrister to obtain an advantage or to the detriment of others.

55.4 NH is bringing the profession into disrepute and in breach of CD 3 and CD 5, the BSB Handbook states:

gC25

Conduct which is likely to be treated as a breach of CD3 and/or CD5 includes (but is not limited to):

...

seriously offensive conduct towards others;

dishonesty;

unlawful discrimination, victimisation or harassment;

or abuse of your professional position.

Conclusions

56. NH and UKLFI on the basis of flagrant falsehoods accuse everyone, including Karim Khan KC, the Judges of the International Court of Justice and International Criminal Court, of lying. It is impossible to conclude that an objective view could lead to the matters complained of above, rather it is due to a stated mission to protect Israel, an entity which is known to use systematic deception in order to justify its war crimes against Palestinians (ANNEX 08). NH has made clear that her views are ideologically driven by a racist view against arabs and Israel should not apologise for its actions towards them. In the newsletter, IsraelHayom on 7th March 2024⁷⁸ (ANNEX 16), Ms Hausdorff said;

"I'd encourage Israel to be more 'tachles,'" Hausdorff says, using the Hebrew term for 'straightforward.' "It's crucial that we don't sugarcoat reality. We need to be unequivocal in our message: Israel is fighting the West's war. For decades, Israeli public diplomacy has tended to apologize for defending itself against Arab terrorism. I hope to see a shift in

⁷⁷ <https://www.barstandardsboard.org.uk/static/e803d194-972c-43b4-84bf162568cee383/60838a0a-904d-4a15-92af9e236b2ed1a2/Guidance-on-the-regulation-of-non-professional-conduct-September-2023.pdf>

⁷⁸ <https://www.israelhayom.com/2024/07/03/natasha-hausdorff-the-british-attorney-who-fights-israels-wars-and-sounds-alarm-on-a-uk-labour-government/>

this stance. If we apologize for self-defense, we can hardly expect the international community to go out of its way to support Israel in its ongoing struggle against Palestinian terrorism.”

57. The use of the term “Arab terrorism” is clearly racist. NH’s belief that Israel is fighting the West’s war is based on falsely elevating a conflict over land and resources to one in which Israel are fighting against Palestinians because as Muslims and Arabs they are an existential threat to the West. These beliefs underpin far right politics in the west, as well as racist massacres in the West (ANNEX 17) and are inherently racist and extremist⁷⁹. In July 2025 the Charity Commission launched an investigation into UKLFI upon complaints it breached UK charity law prohibiting incitement to hatred on the grounds of race or religion and the promotion of views that denigrate those of a particular faith or race⁸⁰.
58. The Respondent’s seek to undermine the rule of law in an enterprise to defend Israel’s crimes against humanity and war crimes by use the profession as a vehicle for legitimacy in breach of CD1. UKLFI’s BSB complaint against both Andrew Caryley KC and Karim Khan KC has been made amid an intense campaign by Israel⁸¹ (ANNEX 18) to derail the ICC investigations and target the two British Barristers resulting in threats to their safety and ill-health and sabotaging their investigations. In January 2025 the Bar Council expressed public concern about the rising reports from members who have faced intimidation, attacks and threats, including media vilification, cyber-attacks and online harassment, physical surveillance and reprisals for engaging or cooperating with the United Nations⁸².
59. The regulatory objectives of the Bar Standards Board include “supporting the constitutional principles of the rule of law” and it’s published Anti-Racist Strategy 2024-2027 commits to a “zero-tolerance approach to racism,” where “allegations of racism must be taken seriously, and action must always be taken in response to inappropriate behaviour”. The BSB must be seen to take action against very flagrant and dangerous violations of the Code of Conduct.
60. I am a Barrister and compelled to make this complaint under Code of Conduct rC66. I have been subject to disciplinary proceedings for tweets which criticised Israeli practices alleged to anti-Semitic (charges were dropped eventually). One of the complainants against me was UKLFI, however recent investigations have shown that UKLFI misuse disciplinary procedures to lodge disciplinary complaints to regulators against professionals who criticise Israel or support Palestinian rights^{83 84} (ANNEX 19). The complaint against me has in no way affected the complaint I am now making but it has allowed me insight to BSB decision making processes and it would be inconsistent to not investigate this very serious complaint in comparison to the way the complaint was handled against me.

⁷⁹ <https://www.aljazeera.com/opinions/2019/3/29/hating-muslims-loving-zionists-israel-as-a-far-right-model>

⁸⁰ <https://www.cage.ngo/articles/zionist-group-under-charity-commission-investigation-following-cage-complaint>

⁸¹ <https://www.middleeasteye.net/news/karim-khan-le-monde-investigates-campaign-against-icc-chief>

⁸² <https://www.counsellmagazine.co.uk/articles/council-of-europe-treaty-to-protect-lawyers>

⁸³ https://www.youtube.com/watch?v=Ui70R8PckJ4&t=77s&ab_channel=LedByDonkeys

⁸⁴ <https://www.cage.ngo/articles/cage-report-exposes-uk-zionist-lobby-s-attempts-to-outlaw-palestinian-activism>

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