

October 25, 2023

Dear Apple,

As you are no doubt are aware, on October 7 Hamas terrorists invaded Israel, murdering over a thousand civilians, wounding many more and taking approximately 200 Israelis hostage, most of them women, seniors and children. This was a massacre – the level of violence was unprecedented—as well as a crime against humanity (see <https://www.un.org/en/genocideprevention/crimes-against-humanity.shtml>).

The United States designated Hamas as terror organization a number of decades ago and they remain on both United States and international terror lists. Furthermore, under the Department of the Treasury's Office of Foreign Assets Controls regulations, Hamas and its affiliates are blocked from conducting any business with United States persons.

I would like to draw your attention to this article: <https://www.jpost.com/breaking-news/article-769852>, which describes how, in response to the crimes of Hamas and the ongoing humanitarian catastrophe, Google has blocked Hamas channels on Telegram downloaded via Google Play Store, including channels:

- <https://t.me/qassambrigades> (739,956 subscribers)
- https://t.me/spokesman_2020 (578,687 subscribers)
- <https://t.me/hpress> (531,328 subscribers)
- <https://t.me/jeningqassam> (424,415 subscribers)
- <https://t.me/qassam1brigades> (207,895 subscribers)
- <https://t.me/qabasat2018> (94,374 subscribers)
- https://t.me/kataeb_moqawma (12,752 subscribers)

We believe this was both a prudent measure as well as one that may have been required under applicable United States laws and regulations relating to providing assistance to designated terror groups.

We respectfully request that Apple investigate these Hamas channels on Telegram downloaded via Apple App Store and, if you find that the use of these channels by a United States designated foreign terror organization violates your own rules or applicable laws, terminate any use, whether direct or indirect, of the App Store by Hamas and its affiliates.

If you have any questions, please be in touch.

Regards,

Ron Machol

www.zachorlegal.org