DEFENSE FOR CHILDREN
INTERNATIONAL – PALESTINE; AL-HAQ; AHMED ABU ARTEMA;
MOHAMMED AHMED ABU ROKBEH;
MOHAMMAD HERZALLAH, A.N.;
LAILA ELHADDAD; WAEIL ELBHASHI;
BASIM ELKARRA; and DR. OMAR EL-
NAJJAR

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., President of the United States, ANTONY J. BLINKEN,
Secretary of State, LLOYD JAMES
AUSTIN III, Secretary of Defense, in their official capacities,

Defendants.
TABLE OF CONTENTS

TABLE OF AUTHORITIES ................................................................. 2
INTEREST OF AMICI CURIAE .......................................................... 5
SUMMARY OF ARGUMENT ............................................................... 5
ARGUMENT .................................................................................. 6

I. THE ISRAELI GOVERNMENT HAS DELIBERATELY TARGETED THE HEALTH
SECTOR IN GAZA FOR DEPRIVATION AND DESTRUCTION .................................. 6

A. Prior to the current genocide, Israel had taken deliberate actions to force Gaza’s health sector
into a constant state of emergency. ........................................................................ 6

B. Since October 7, 2023, the Israeli government has committed acts of genocide by
deliberately targeting the health system in Gaza, including hospitals, emergency medical services,
ambulance convoys, healthcare workers, and power and water generators, with the intent to render
life for Palestinians in Gaza impossible. .................................................................... 9

1. The Israeli military has destroyed or disabled the vast majority of Gaza’s health sector
through targeted bombing, forced evacuations of hospitals, and siege. ......................... 9

2. Israel has made it impossible for paramedics and ambulances to effectively coordinate
search and rescue operations by refusing ambulance access, firing upon emergency service
providers, and shutting down telecommunications. ..................................................... 14

3. The Israeli government’s complete closure of Gaza since October 7, 2023 has prevented
life-saving medical assistance and volunteers from entering. ........................................ 17

II. THE ISRAELI GOVERNMENT’S ASSAULT ON GAZA’S HEALTH SYSTEM IS AN ACT
OF GENOCIDE AGAINST THE PALESTINIAN PEOPLE ....................................... 17

CONCLUSION .................................................................................. 18
APPENDIX A – LIST OF AMICI ......................................................... 20
# TABLE OF AUTHORITIES

**International Materials**


**Litigation Materials**

- Complaint .............................................................................................................................................. 6

**International organizations**

- Médecins Sans Frontières, Gaza: Attack on ambulance outside Al-Shifa hospital, News (Nov. 4, 2023) .......................................................... 16
- Médecins Sans Frontières, MSF convoy attacked in Gaza: all elements point to Israeli army responsibility, Press Release (Dec. 1, 2023) .......................................................... 17
- Medecins Sans Frontièrè, Patients and medical staff in Gaza trapped in hospitals under fire - attacks must stop now, Press Release (Nov. 11, 2023) .......................................................... 12
- Médecins Sans Frontières, Patients and medical staff in Gaza trapped in hospitals under fire - attacks must stop now, Press Release (Nov. 11, 2023) .......................................................... 13
- Medical Aid for Palestinians, “Infographic: Attack on Medical Facilities and Personnel in the West Bank and Gaza” (October 1, 2017) .......................................................... 8
- Palestine Red Crescent Society, Statement on the Israeli Occupation Forces shelling of the Ambulance Convoy transporting the injured from the aggression on Gaza toward Rafah crossing border, (Nov. 3, 2023) .......................................................... 16

**Media sources**

- Abu Bakr Bashir et al., 34 Hours of Fear: The Blackout That Cut Gaza Off From the World, N.Y. Times (Oct. 29, 2023) .......................................................... 15
- Aisyah Llewellyn, Indonesian staff at Gaza hospital ‘resigned to fate’ as Israelis close in, Aljazeera (Nov. 12, 2023) .......................................................... 10
- Aljazeera, Gaza aid trucks stranded as Israel-Hamas war resumes (Dec. 1, 2023) .......................................................... 18
- Aljazeera, Investigations reveal discrepancies in Israel’s Gaza hospital attack claims, (Oct. 20, 2023) .......................................................... 10
- Aljazeera, Israeli army arrests Al-Shifa Hospital director, other doctors in Gaza, (Nov. 23, 2023) .......................................................... 17
- Aljazeera, Telecommunications cut off in Gaza after fuel runs out amid Israeli siege, (Nov. 16, 2023) .......................................................... 16
- Aljazeera, Under the rubble: The missing in Gaza, (Dec. 28, 2023) .......................................................... 24
- Aljazeera, Which of Gaza’s hospitals is Israel threatening?, Explainer (Nov. 10, 2023) .......................................................... 12
- Anadolu Staff, Hospital director killed in Israeli airstrike in Gaza, (Nov. 18, 2023) .......................................................... 13
- Andrew Carey et al., “Israel admits airstrike on ambulance near hospital that witnesses say killed and wounded dozens,” CNN (Nov. 4, 2023) .......................................................... 13
- Armani Syed, What Aid Groups Say Gaza Needs, TIME (Oct. 24, 2023) .......................................................... 18
- Astha Rajvanshi, The Race to Save Premature Babies in Gaza, TIME (Nov. 22, 2023) .......................................................... 12
- B’Tselem, Humanitarian Catastrophe as Policy, Media (Dec. 7, 2023) .......................................................... 18
- Beyza Binurr Damz, WHO chief urges Israel to reverse Al Awda Hospital evacuation demand, Anadolu Ajansi (Oct. 13, 2023) .......................................................... 11
Chao Deng, Gaza Hospitals, Shelters Cut Back on Services as Fuel Runs Short, Wall Street Journal (Oct. 27, 2023) ................................................................. 18
CNN, Al-Shifa Hospital director in Gaza says no water or oxygen left, (Nov. 16, 2023) .......................................................... 12
David Paulsen, Anglican hospital among facilities struggling to respond to growing humanitarian crisis in Gaza, Episcopal News Service (Oct. 16, 2023) .......................................................... 10
Erin Banco and Nahal Toosi, US has sent Israel data on aid group locations to try to prevent strikes, Politico (Nov. 21, 2023) ............................................................... 12
Gabrielle Tétrault-Farber, “Northern Gaza no longer has a functional hospital, WHO says,” Reuters (Dec. 21, 2023) ............................................................... 13
Gabrielle Tétrault-Farber, WHO says Gaza's health system must be protected as disease spreads, Reuters, (Nov. 29, 2023) ............................................................... 14
Isabel Debre and Wafaa Shurafa, Palestinian medics struggle to save civilians trapped under rubble amid Israeli bombardment, PBS (Oct. 17, 2023) .......................................................... 16
James Mackenzie and Maayan Lubell, Israel launches Gaza war's second phase with ground operation, Netanyahu says, Reuters (Oct. 28, 2023) .......................................................... 11
Kaamil Ahmed, ‘Scarred for life’: the families still seeking dead amid Gaza rubble, The Guardian (Nov. 25, 2023) ............................................................... 16
Liam Stack, W.H.O. Describes Grim Scenes at Hospitals in Gaza’s North, N.Y. Times (Dec. 21, 2023) ............................................................... 10
Louisa Loveluck et al., The case of Al-Shifa: Investigating the assault on Gaza’s largest hospital, Washington Post (Dec. 21, 2023) ............................................................... 12
Malachy Browne and Neil Collier, Evidence Points to Israeli Shells in Strikes on Gaza’s Largest Hospital, N.Y. Times (Nov. 14, 2023) .......................................................... 12
Matt Burgess and Lily Hay Newman, Internet Blackouts in Gaza Are a New Weapon in the Israel-Hamas War, Wired (Nov. 7, 2023) .......................................................... 15
Mohammed Majd, 80% of Gaza's rescue equipment destroyed in Israeli attacks: Government, Anadolu Ajansi (Dec. 3, 2023) .......................................................... 16
Mohammed R Mhawish, The Gaza medics who won’t give in to Israel’s evacuation demand, Aljazeera (Oct. 14, 2023) ........................................................... 11
Najib Jobain, Jack Jeffery and Colleen Barry, The UN says more than 1 in 4 people in Gaza are starving because of war, AP News (Dec. 21, 2023) .......................................................... 18
Oliver Slow, Al-Shifa: WHO says Gaza hospital unable to bury dead bodies, BBC News (Nov. 13, 2023) ............................................................ 13
Press TV, Bombing of Gaza hospital not first time Israel has targeted hospitals, (Oct. 19, 2023) ... 13
Public statements by Israeli Minister of Defense Yoav Gallant evince the punitive, destructive intentions behind its complete siege of Gaza. Democracy Now, “‘No Electricity, No Food, No Fuel’: U.N. Condemns ‘Complete Siege of Gaza Strip’” (Oct. 10, 2023) .......................................................... 17
Raja Abdulrahim, Hiba Yazbek and Yousur Al-Hlou, A Sudden Blast, Then Carnage in a Hospital Courtyard, N.Y. Times (Oct. 20, 2023) .......................................................... 10
Reuters, Blackout disconnects bombed Gazans from world and each other, (Oct. 28, 2023) .... 15
UN News, Israel-Palestine: Gaza buckles under fuel shortage, healthcare in crisis, Humanitarian Aid (Oct. 24, 2023) .......................................................... 18

**UN Sources**

Health Cluster in the Occupied Palestinian Territory, (Gaza Strip: Joint Health Sector Assessment Report,\) (September 2014) .......................................................... 8
James Elder, Gaza: The world’s most dangerous place to be a child, UNICEF Geneva Palais briefing note (Dec. 19, 2023) .......................................................... 13
OHCHR, Disturbing reports from the north of Gaza of mass detentions, ill-treatment and enforced disappearances of possibly thousands of Palestinians, (Dec. 16, 2023) .......................................................... 13
The Palestinian Center Human Rights, “PCHR Warns of Health Sector Collapse and Suspension of Health Services in the Gaza Strip,” (25 August 2020) .......................................................... 7
U.N. OCHA, Electricity in the Gaza Strip, Data (n.d.) .......................................................... 15

**AMICI BRIEF OF MEDICAL PROFESSIONALS IN SUPPORT OF PLAINTIFFS**
U.N. OCHA, Escalation in the Gaza Strip and Israel, Flash Update #1 (Oct. 7, 2023) ....................... 10
U.N. OCHA, Escalation in the Gaza Strip and Israel, Flash Update #5 (Oct. 11, 2023) ....................... 15
U.N. OCHA, Hospital Evacuation Orders Mapping as of 16th October 2023, (Oct. 16, 2023) .......... 11
U.N. OCHA, Hostilities in the Gaza Strip and Israel Flash Update #25, (Oct. 31, 2023) .......... 12, 16
U.N. OCHA, Hostilities in the Gaza Strip and Israel Flash Update #4, (Oct. 10, 2023) .......... 14
U.N. OCHA, Hostilities in the Gaza Strip and Israel Flash Update #73 (Dec. 19, 2023) .......... 14
U.N. OCHA, Hostilities in the Gaza Strip and Israel, Flash Update #25, (Oct. 31, 2023) .......... 11
U.N. OCHA, Hostilities in the Gaza Strip and Israel, Flash Update #68 (Dec. 13, 2023) .......... 13
U.N. OHCA, Hostilities in the Gaza Strip and Israel, Flash Update #48, (Nov. 23, 2023) .......... 17
WHO, Women and newborns bearing the brunt of the conflict in Gaza, UN agencies warn, Statement (Nov. 3, 2023) .................................................................................................................. 14
WHO, oPt Emergency Situation Report, Issue 3 (Oct. 12, 2023) .................................................... 10
World Health Organization, “Health Conditions in the Occupied Palestinian Territory, Including East Jerusalem and in the Occupied Syrian Golan,” A76/15 (17 May 2023) .................. 7
World Health Organization, Evacuation orders by Israel to hospitals in northern Gaza are a death sentence for the sick and injured, Press Release (Oct. 14, 2023) .................................................. 11

NGO Reports
Access Now, Palestine unplugged: how Israel disrupts Gaza’s internet, (Nov. 10, 2023) .......... 15
Al Mezan, Medical Care Under Siege: Israel’s Systematic Violation of Gaza’s Patient Rights, (February 2018) .................................................................................................................. 7
Amnesty International, Another blackout in Gaza imminent if sufficient fuel is not restored, (Nov. 15, 2023) ................................................................. 8
Human Rights Watch (HRW), “Rain of Fire: Israel’s Unlawful Use of White Phosphorus in Gaza” (March 25, 2009) ................................................................. 6
The Palestinian Centre for Human Rights, Al-Haq and Al Mezan Center for Human Rights, " Civilians trapped under the rubble: medical and rescue teams denied access to IOF-deployed areas," (Dec. 17, 2023) ................................................................. 17

Other
Christopher Mason, Canadian Medical Association, “Gaza’s Health Care System Crippled Before– And After” (March 17, 2009) ................................................................. 8
Forensic Architecture, “Destruction of Medical Infrastructure in Gaza” (Dec. 20, 2023) .......... 10, 12
Forensic Architecture, Civilians holding white flags are fired on as they try to leave Al-Shifa, Mostafa Sarsour reports, Video (Nov. 14, 2023) .................................................................................................................. 12, 13
Global Health Institute, Wounds of War: The Gaza Experience Through the Eyes of Dr. Ghassan Abu Sitta, American University of Beirut (Dec. 14, 2023) .................................................................................................................. 11
INTEREST OF AMICI CURIAE

The amici curiae\(^1\) are doctors and medical professionals, including doctors from the Gaza Strip (“Gaza”), who are applying their medical and public health knowledge and expertise to advocate against genocide and other atrocities. As the instant case requires the court to assess the significance of these deliberate attacks against the health sector in Gaza, the amici represent an important voice and perspective not otherwise directly before the court: that of the medical community. Amici are watching the intentional destruction of the health sector in Gaza with grave concern, and write to highlight the ways in which the Israeli government has intentionally attacked health services and the catastrophic effect those attacks have on the possibility of Palestinian life in Gaza. Collectively, these attacks constitute acts of genocide.

SUMMARY OF ARGUMENT

Under customary international law, Article II of the Genocide Convention\(^2\), and 18 U.S.C. § 1091, genocide occurs where an entity commits certain acts with the intent to destroy a national, ethnic, racial, or religious group in whole or in part. Plaintiffs’ pleadings and briefs, and supporting expert declarations, have made clear the genocidal intent behind Israel’s attack and siege on Palestinians in Gaza since October 7, 2023, which Israeli officials at the highest level of government have expressed through clear statements. See, Complaint ¶¶ 11-13, 67-69, 72, 74, 91, 95, 98, 99, 101, 104, 107, 114, 140, 145, and 173. Those intentions have manifested in devastating attacks against Gaza’s health sector, which amount to acts of genocide because they have included the deliberate killing of members of the targeted group, causing serious physical and mental harm to members of the group, and the deliberate infliction of conditions of life calculated to bring about the group’s destruction by reducing health services below the minimum level required to sustain the Palestinian people in Gaza. Section A of Part I provides the historic context of Israel’s targeted deprivation of Gaza’s health sector in the years before the current genocide, and Section B highlights the constitutive underlying acts of Israel’s genocide since October 7, 2023.

\(^{1}\) The amici include the individual medical doctors and healthcare professionals identified in Appendix A. No party or party’s counsel authored this brief in whole or in part or made a monetary contribution to fund the preparation or submission of this brief. Plaintiffs consent to the filing of the proposed amicus brief, and Defendants do not object to amicus briefs filed by December 29th.

ARGUMENT

I. THE ISRAELI GOVERNMENT HAS DELIBERATELY TARGETED THE HEALTH SECTOR IN GAZA FOR DEPRIVATION AND DESTRUCTION.

Even before Israel’s current genocide began on October 7, 2023, Israel had systematically constrained and debilitated Gaza’s health sector since at least 2007, when it imposed a complete air, sea, and land blockade. Israel’s deliberate deprivation, de-development, and destruction of the health sector since 2007 has rendered Palestinian life in Gaza extraordinarily precarious and vulnerable, and provides the context within which Israel’s current genocide has unfolded.

A. Prior to the current genocide, Israel had taken deliberate actions to force Gaza’s health sector into a constant state of emergency.

Since 2007, the Gazan health system has been severely undermined and strangled by the Israeli government, which maintains control over Gaza’s airspace, land and sea borders, maritime areas, electricity, water, telecommunications network, and sewage. See Complaint, ¶¶ 47-55, fn. 4.

As a result, the Palestinians Center for Human Rights describes the health sector as being in “an ongoing state of emergency… always on the edge of collapse.”

From 2007 until 2010, Israel prohibited nearly all imports to Gaza. In January 2008, Israel calculated the number of calories required for Palestinians in Gaza to avoid malnutrition or starvation, and proceeded to admit fewer than that minimum number of calories, on average, nearly every month until July 2010. Since then, Israel’s “dual use” restrictions have prohibited Gazans from accessing thousands of items Israel deems to have a potential military use. Most of the items Israel prohibits are not deemed dual use by any other country in the world, such as medicine, fertilizer, cement mixers, cranes, and steel pipes.

These restrictions specifically deprive the medical sector in Gaza. In February 2023, 41.9% of listed drugs in the Central Drug Store of the Gazan Ministry of Health reached zero stock due to...
Israel’s restrictions. These restrictions have made it impossible for the health sector “to function properly or to plan and develop its performance and activities.” All of Gaza’s hospitals and medical centers are also forced to rely on generators, requiring significant quantities of fuel, which is also heavily restricted by Israel. This unstable electrical system causes hospital machinery to fail more regularly, and shortens the lifespan of sensitive medical machinery. Israel also directly undermines Palestinian access to clean water by restricting the import of chemicals and hardware necessary for desalination and sanitation projects. In early 2023, more than 97% of Gaza’s water was already non-potable and waterborne diseases constituted 25% of diseases among children.

Due to Israel’s deliberate strangulation of Gaza’s health sector, Palestinians must rely on hospitals elsewhere for specialized treatment, and need exit permits from Israel in order to leave Gaza. In 2022, one third of all applications filed by patients in Gaza were not processed in time for their appointments, and less than 40% of applications for accompanying companions were approved in time. Israel has also banned essential cancer diagnosis and treatment tools in Gaza. There is only one mental health hospital in Gaza despite the fact that Israel’s assaults have caused high rates of mental health disorder. Medical professionals seeking specialized training outside of Gaza must

---

8 PCHR, supra note 3. Nitrous oxide gas—an analgesic and anesthetic essential for many surgeries—has been banned at different times. See Al Mezan, Medical Care Under Siege: Israel’s Systematic Violation of Gaza’s Patient Rights, (February 2018) [Link]; Once the Covid-19 vaccine was available, Israel specifically denied access to Gazans. See PCHR, “Israel Deprives Gaza Population of Covid-19 Vaccine” (16 February 2021) [Link].

9 PCHR, supra note 3.

10 World Health Organization, “Health Conditions in the Occupied Palestinian Territory, Including East Jerusalem, and in the Occupied Syrian Golan,” A72/33 (1 May 2019) [Link].

11 Id.

12 UNOCHA, “Gaza Strip The Humanitarian Impact of 15 Years of the Blockade” (June 2022).

13 PCHR, supra note 3.

14 World Health Organization, “Health Conditions in the Occupied Palestinian Territory, Including East Jerusalem and in the Occupied Syrian Golan,” A76/15 (17 May 2023) [Link].

15 The Palestinian Center Human Rights, “PCHR Warns of Health Sector Collapse and Suspension of Health Services in the Gaza Strip,” (25 August 2020) [Link].

16 PCHR, supra note 3.

also apply for exit permits, which Israel usually denies, impeding doctors from developing their capacities and producing a chronic shortage of skilled health workers.\(^{18}\)

Israel has also attacked Gaza’s health sector in prior military campaigns, preventing the emergence of robust and resilient healthcare infrastructure. In late-2008, Israel damaged or destroyed 34 health facilities in Gaza over a 22-day period\(^{19}\), exacerbating pre-existing shortages of essential medicine and supplies.\(^{20}\) Israel shelled the Al-Quds Hospital and the Palestinian Red Crescent Society’s (PRCS) administrative building with white phosphorous, a chemical weapon that ignites upon contact with oxygen causing third-degree burns,\(^{21}\) and shelled the hospital from the ground, targeting the pharmacy unit and destroying a nearby medical store as well as two ambulances.\(^{22}\)

During its 2014 assault, Israel damaged or destroyed 17 hospitals, 56 clinics, and 45 ambulances, and killed 23 medical workers.\(^{23}\)\(^{24}\) At least 49 health professionals were injured in direct attacks,\(^{25}\) including an ambulance worker who was shot in the hip and chest while wearing his uniform and traveling in an ambulance.\(^{26}\) The WHO reported 362 attacks by Israel against the Gazan health sector during the Great Return March of 2018, including the murder of Rouzan al-Najjar, a 21-year-old medic who was assassinated by an Israeli sniper.\(^{27}\) During Israel’s aggression against Gaza in 2021, 

---

\(^{18}\) PCHR, supra note 15. In 2018, the WHO reported that Israel only approved 15% of applications for exit permits on behalf of health providers. See WHO, supra note 10.

\(^{19}\) Id.

\(^{20}\) Christopher Mason, Canadian Medical Association, “Gaza’s Health Care System Crippled Before–And After” (March 17, 2009) [Link].

\(^{21}\) Human Rights Watch (HRW), “Rain of Fire: Israel’s Unlawful Use of White Phosphorus in Gaza” (March 25, 2009) [Link].

\(^{22}\) Amnesty International, Israel/Gaza Operation ‘Cast Lead’: 22 Days of Death and Destruction, (July 2009) [Link]. The number of deaths and injuries from these chemical attacks remains unknown because Gaza’s hospitals lack the diagnostic tools for proving the cause of the burns. See HRW, supra note 21.

\(^{23}\) Medical Aid for Palestinians, Infographic: Attack on Medical Facilities and Personnel in the West Bank and Gaza (October 1, 2017) [Link].

\(^{24}\) Health Cluster in the Occupied Palestinian Territory, Gaza Strip: Joint Health Sector Assessment Report, (September 2014), 9 [Link].

\(^{25}\) Amnesty International UK, Gaza: New Evidence of Deliberate Attacks on Medics by Israeli Army, (7 August 2014) [Link].

\(^{26}\) Id.

\(^{27}\) Forensic Architecture, “The Killing of Rouzan al-Najjar” (April 25, 2019) [Link].
it continued to ruthlessly target the health sector, damaging or destroying 19 clinics\(^{28}\) and murdering two leading Palestinian doctors within hours of each other by bombing their homes near Al-Shifa Hospital.\(^{29}\) Dr. Abu al-Ouf was head of Al-Shifa Hospital’s Covid-19 response program and the Internal Medicine Department, while Dr. Al-Aloul was one of the only neurologists in Gaza.\(^{30}\)

By forcing the Gazan health sector into a constant state of emergency and precarity, Israel laid the foundation for its complete genocidal assault on Gaza since October 7, 2023—in which it is pushing the already-vulnerable Palestinian population in Gaza to the point of extermination.

**B. Since October 7, 2023, the Israeli government has committed acts of genocide by deliberately targeting the health system in Gaza, including hospitals, emergency medical services, ambulance convoys, healthcare workers, and power and water generators, with the intent to render life for Palestinians in Gaza impossible.**

Israel’s genocidal assault on Gaza since October 7 has included the siege of hospitals, enforced disappearances of doctors, targeted killings of medical professionals, and large-scale destruction of healthcare facilities. This complete destruction of Gaza’s health sector, coupled with Israel’s restrictions on the entry of humanitarian aid and fuel, the spread of epidemic diseases, and the intentional targeting of emergency services, makes Palestinian life in Gaza all but impossible.

1. **The Israeli military has destroyed or disabled the vast majority of Gaza’s health sector through targeted bombing, forced evacuations of hospitals, and siege.**

Since October 7, Israel’s military assault on Palestinians in Gaza has been characterized by deliberate, widespread, and systematic attacks on medical facilities, including direct targeting, besiegement, and repeated bombardment of surrounding areas.\(^{31}\) According to the WHO, only 9 out of 36 health facilities in Gaza remain partially functional, and they are all located in the south.\(^{32}\)

In the first four days of Israel’s bombardment the WHO documented 33 attacks on healthcare, including the targeting of areas near Beit Hanoun hospital and 18 other healthcare facilities.

---


\(^{29}\) Shrouq Aila, Anna Therese Day, “Israel Attacks on Gaza Left Strained Health Care System in Tatters,” The Intercept (May 21, 2021) [Link].

\(^{30}\) Id.

\(^{31}\) Forensic Architecture, “Destruction of Medical Infrastructure in Gaza, Investigation” (Dec. 20, 2023) [Link].

\(^{32}\) Liam Stack, “W.H.O. Describes Grim Scenes at Hospitals in Gaza’s North,” N.Y. Times (Dec. 21, 2023) [Link].
facilities, resulting in 11 fatalities, 16 injuries among medical staff, and damage to 20 ambulances.  

On October 7, Israel struck the Indonesian hospital, resulting in the death of a staff member and damage to the oxygen station. That same day, Israeli airstrikes also targeted ambulance stations in front of Nasser Hospital, injuring several paramedics. Forced to navigate an unthinkable crisis while working long shifts without respite, medical volunteers sourced food and supplies from the surrounding areas, but as the military encircled the hospital, missiles targeted the medical teams.

By October 14, one week into Israel’s genocidal campaign, two hospitals in northern Gaza had ceased operations due to relentless bombardment and the use of white phosphorus. On October 14, the Al-Ahli hospital was struck, and the administrators received at least three evacuation orders over the next few days. On October 17, the hospital was directly bombarded, resulting in the deaths of more than 470 people. While Israel denied responsibility for the attack on Al-Ahli, its airstrikes only escalated in the immediate aftermath as it targeted at least four pediatric hospitals that week.

By October 31, Israeli forces occupied the area near Karama Hospital, and encircled the Turkish Friendship and Al-Wafa hospitals. The Turkish Friendship hospital—Gaza’s main cancer treatment centre—was repeatedly targeted by Israeli warplanes for two consecutive nights before being forced to shut down.

33 U.N. OCHA, “Hostilities in the Gaza Strip and Israel, Flash Update # 5” (Oct. 11, 2023) [Link]; WHO, “oPt Emergency Situation Report, Issue 3” (Oct. 12, 2023) [Link].
34 U.N. OCHA, “Escalation in the Gaza Strip and Israel, Flash Update #1” (Oct. 7, 2023) [Link].
35 Id.
36 Aisyah Llewellyn, “Indonesian staff at Gaza hospital ‘resigned to fate’ as Israelis close in,” Aljazeera (Nov. 12, 2023) [Link].
40 U.N. OCHA, “Hostilities in the Gaza Strip and Israel, Flash Update #25,” (Oct. 31, 2023) [Link].
41 @MSF, Twitter (Nov. 1, 2023) [Link].
In addition to directly attacking hospitals, Israel has also disrupted their operations by ordering mass evacuations with extremely short notice. By October 16, 23 hospitals, treating more than 2000 patients in northern Gaza, had received evacuation orders or calls from the military threatening to bomb the hospitals.\textsuperscript{42} People sheltering at the hospitals were afraid to leave because convoys of evacuees had already been targeted by airstrikes.\textsuperscript{43} Doctors also refused to abandon their critically ill patients who relied on intensive care or life support—including newborns in incubators—and could not be safely transported.\textsuperscript{44} Some hospitals were initially given only two hours to evacuate.\textsuperscript{45} The WHO warned that “moving the patients would put their lives at immediate risk, as well as the lives of the health workers,” while Doctors Without Borders deplored the “indiscriminate bloodshed” as an “attack on medical care and on humanity.”\textsuperscript{46}

One hospital that was unable to evacuate is the Al-Shifa hospital in Gaza City, where approximately 50,000 people were taking refuge in November\textsuperscript{47} when the hospital was repeatedly targeted for shelling, including of the maternity department.\textsuperscript{48} \textsuperscript{49} Israel attacked these facilities despite having their precise GPS coordinates.\textsuperscript{50} To justify its invasion and siege of the hospital,
Israel claimed, without providing any credible evidence, that Al-Shifa was a command base for Palestinian militants.\(^{51}\) On November 10, at least four airstrikes targeted the hospital courtyard.\(^{52}\)

During Israel’s subsequent ground raid on Al-Shifa hospital, soldiers stormed the facility, destroyed the southern entrance, and were “shooting in all directions… while hundreds of patients and medical staff remain[ed] in the complex.”\(^{53}\) Due to the lack of fuel and power outages across the hospital, doctors were forced to remove at least 39 premature babies from incubators, eight of whom did not survive the first week.\(^{54}\) Two intensive care unit patients also died due to lack of electricity and oxygen, while the hospital continued to suffer repeated attacks. Chronically ill patients requiring ventilators or dialysis were left to die without fuel to power the hospital. New patients could no longer be admitted due to the lack of power, supplies, and personnel, which brought operating rooms to a halt and “left surgeons with no choice but to operate on patients on floors and without anesthetics or pain relief.”\(^{55}\) As bodies piled up in the hospital courtyard, patients awaiting surgery were at grave risk of contracting “post-operation infection due to lack of antibiotics.”\(^{56}\) Within 48 hours, the hospital was forced out of service. Due to Israel’s occupation of surrounding areas,\(^{57}\) the doctors had to dig a mass grave in the hospital’s courtyard.\(^{58}\) Israeli forces prevented ambulances from responding to emergency calls, shot at people attempting to leave the hospital, and kidnapped the hospital director and five staff members trying to evacuate patients.\(^{59}\)

\(^{51}\) Louisa Loveluck et al., “The case of Al-Shifa: Investigating the assault on Gaza’s largest hospital,” Washington Post (Dec. 21, 2023) [Link].

\(^{52}\) Malachy Browne and Neil Collier, “Evidence Points to Israeli Shells in Strikes on Gaza’s Largest Hospital,” N.Y. Times (Nov. 14, 2023) [Link].

\(^{53}\) CNN, “Al-Shifa Hospital director in Gaza says no water or oxygen left,” (Nov. 16, 2023) [Link].

\(^{54}\) Astha Rajvanshi, “The Race to Save Premature Babies in Gaza,” TIME (Nov. 22, 2023) [Link].

\(^{55}\) Aljazeera, “Which of Gaza’s hospitals is Israel threatening?,” Mostafa Sarsour reports, [Link].

\(^{56}\) Forensic Architecture, “Civilians holding white flags are fired on as they try to leave Al-Shifa, northern Gaza no longer has a functional hospital,” [Link].

\(^{57}\) CNN (Nov. 4, 2023) [Link]; Andrew Carey et al., “Israel admits airstrike on ambulance near hospital that witnesses say killed and wounded dozens,” [Link].

\(^{58}\) Oliver Slow, “Al-Shifa: WHO says Gaza hospital unable to bury dead bodies,” BBC News (Nov. 13, 2023) [Link].

\(^{59}\) Médecins Sans Frontières, “Patients and medical staff in Gaza trapped in hospitals under fire attacks must stop now,” [Link]; OHCHR, “Disturbing reports from the north of Gaza of mass detentions, ill-treatment and enforced disappearances of possibly thousands of Palestinians,” [Link].
The direct targeting of hospitals and their medical staff by the air and ground raids has not been limited to northern Gaza. On November 17, Al-Wafa Hospital for the Elderly Care was hit by Israeli airstrikes which killed the hospital’s director, Midhad Mhaisen, and injured several doctors.\footnote{Anadolou Staff, “Hospital director killed in Israeli airstrike in Gaza,” (Nov. 18, 2023) [Link].}

Similarly, Israeli forces targeted the Abu Yousef al-Najjar Hospital after issuing evacuation orders.\footnote{Press TV, “Bombing of Gaza hospital not first time Israel has targeted hospitals,” (Oct. 19, 2023) [Link].}

Israel’s direct attacks on medical facilities continue to this day unabated, and in December, Israeli warplanes targeted hospitals and densely populated areas in the Jabalia and Nuseirat refugee camps—increasing the number of wounded and forcibly displaced people.\footnote{U.N. OCHA, “Hostilities in the Gaza Strip and Israel, Flash Update #68” (Dec. 13, 2023) [Link].}

On December 17, the Israeli military twice targeted the Nasser Medical Complex, which was the largest remaining fully functioning hospital in Gaza and sheltered "large numbers of children who have brutal wounds of war” as well as hundreds of displaced women and children seeking safety.”\footnote{James Elder, “Gaza: The world’s most dangerous place to be a child,” UNICEF Geneva Palais briefing note (Dec. 19, 2023) [Link].}

In addition to medical facilities, Israel has also targeted water, sanitation, and hygiene facilities serving over 500,000 people.\footnote{U.N. OCHA, “Hostilities in the Gaza Strip and Israel Flash Update #4,” (Oct. 10, 2023) [Link].}

In northern Gaza, sewage and solid waste has been accumulating in the streets due to damage to sewage lines and infrastructure. On October 8, Israel cut the water supply to Gaza by 100%, limiting access to drinkable water for at least 610,000 people in Gaza.\footnote{Id.}

This destruction of essential water and hygiene services, coupled with the lack of fuel to power hospitals, is a public health hazard that directly contributes to preventable mortality and compounds the traumas resulting from Israel’s genocidal campaign. Disruptions to water and waste management also increase the risk of respiratory tract infections, diarrhoea, hepatitis, scabies, lice, and other epidemic diseases,\footnote{Gabrielle Tétrault-Farber, “WHO says Gaza's health system must be protected as disease spreads,” Reuters, (Nov. 29, 2023) [Link].}

and disproportionately affect women and children in Gaza.\footnote{WHO, “Women and newborns bearing the brunt of the conflict in Gaza,” UN agencies warn, Statement (Nov. 3, 2023) [Link]; U.N. OCHA, “Hostilities in the Gaza Strip and Israel Flash Update #73” (Dec. 19, 2023) Link. (UNICEF’s spokesperson warned that the risk of disease would have a devastating impact on children, stating: “Without sufficient safe water, food and sanitation… child deaths due to disease could surpass those killed in bombardments.”).}
2. **Israel has made it impossible for paramedics and ambulances to effectively coordinate search and rescue operations by refusing ambulance access, firing upon emergency service providers, and shutting down telecommunications.**

   In the first week of Israel’s military campaign in Gaza, “airstrikes targeted several telecommunication installations, destroying two of the three main lines for mobile communication,” devastating mobile and internet services.\(^68\) At the same time, Israel cut off electricity to Gaza, reducing available electricity to 3-4 hours per day. Consequently, the GPP became the only source of power, until it ran out of fuel on October 11 amid Israel’s “complete blockade.”\(^69\) Israeli authorities explicitly stated that they would attack the GPP, “if it received any fuel.”\(^70\) The imposed electricity blackout significantly compounded the deteriorating health crisis in Gaza by depriving water treatment plants of the power needed to operate wells and pumps. By October 11, 80% of Gaza’s wastewater treatment plants had stopped working due to lack of power.\(^71\)

   In late-October, Israel imposed a series of telecommunications blackouts during its full-scale ground invasion and escalated its bombardment while sabotaging search and rescue efforts, leaving thousands of Palestinians trapped under the rubble—unable to contact loved ones or ambulances.\(^72\) During a nearly 48-hour blackout from October 27-29, Israel bombarded the Al-Shifa, Al-Quds, and Indonesian hospitals, killing at least 300 Palestinians. From October 31 to November 1, another blackout ensued while Israel increased its bombardment.\(^73\) Suspending telecommunications services is a documented practice that Israel uses punitively to impede life-saving operations.\(^74\) International

---

\(^68\) U.N. OCHA, “Hostilities in the Gaza Strip and Israel Flash Update #4” (Oct. 10, 2023) [Link].
\(^69\) U.N. OCHA, “Escalation in the Gaza Strip and Israel, Flash Update #2” (Oct. 8, 2023) [Link].
\(^70\) U.N. OCHA, “Escalation in the Gaza Strip and Israel, Flash Update #5” (Oct. 11, 2023) [Link]; U.N. OCHA, “Electricity in the Gaza Strip, Data” (n.d.) [Link].
\(^71\) U.N. OCHA, “Escalation in the Gaza Strip and Israel, Flash Update #5” (Oct. 11, 2023) [Link]; U.N. OCHA, Electricity in the Gaza Strip, Data (n.d.) [Link].
\(^73\) Amnesty International, “Another blackout in Gaza imminent if sufficient fuel is not restored,” (Nov. 15, 2023) [Link].
human rights organizations including Human Rights Watch, the WHO, and Amnesty International have decried the blackouts,\(^{75}\) which “make it impossible for ambulances to reach the injured.”\(^{76}\)

During another communication and network blackout on November 5, Israeli forces continued to target hospitals in Gaza City including the Nasser Medical Complex, which hosts four hospitals—Al-Nasser Children’s Hospital, the Al-Rantisi Hospital for pediatric cancer\(^{77}\), the Eye Hospital, and the Psychiatric Hospital.\(^{78}\) Staff from Al-Rantisi hospital including Dr. Suleiman Qaoud received calls from the Israeli army warning that “they will create a fire belt around the hospital.” 35 people were wounded including medical staff from one of the first airstrikes that hit the area between the Psychiatric and Al-Rantisi hospital; consecutive aerial bombings ensued within hours. On November 16, telecom companies ran out of backup batteries due to Israel’s ban on fuel deliveries, forcing Gaza into another complete backout. Emergency responders were on standby outside of hospitals “waiting to hear of any bombardments, so they can rush to the areas quickly.”\(^{79}\)

In addition to imposing power and communications blackouts, Israel has also directly targeted emergency rescue services for attack. Teams from Palestinian Civil Defense and the PRCS have been attacked while searching for survivors or bodies under the rubble following airstrikes.\(^{80}\) The military also restricts ambulance access to areas affected by bombardment.\(^{81}\) As of December 16, more than 7,000 people, including at least 4,900 children, have been reported missing and may be trapped or dead under the rubble.\(^{82}\) The continuous airstrikes not only endanger emergency rescue teams, but the lack of proper equipment makes their mission even more difficult to carry out.\(^{83}\) The

\(^{75}\) Aljazeera, “Gaza’s communications blackout raises concerns of Israeli war crimes,” (Oct. 28, 2023) \[Link\].

\(^{76}\) Id.

\(^{77}\) Aljazeera, “Which of Gaza’s hospitals is Israel threatening?,” Explainer (Nov. 10, 2023) \[Link\]

\(^{78}\) Abdelhakim Abu Riash, “Israel continues to attack hospitals in Gaza, killing at least 8,” Aljazeera (Nov. 7, 2023) \[Link\].

\(^{79}\) Aljazeera, “Telecommunications cut off in Gaza after fuel runs out amid Israeli siege,” (Nov. 16, 2023) \[Link\].

\(^{80}\) U.N. OCHA, “Hostilities in the Gaza Strip and Israel Flash Update #25” (Oct. 31, 2023) \[Link\].

\(^{81}\) Kaamil Ahmed, “‘Scarred for life’: the families still seeking dead amid Gaza rubble,” The Guardian (Nov. 25, 2023) \[Link\].

\(^{82}\) Aljazeera, “Under the rubble: The missing in Gaza” (Dec. 28, 2023) \[Link\].

\(^{83}\) Isabel Debre and Wafaa Shurafa, “Palestinian medics struggle to save civilians trapped under rubble amid Israeli bombardment” PBS (Oct. 17, 2023) \[Link\]; Mohammed Majd, “80% of Gaza's rescue equipment destroyed in Israeli attacks: Government,” Anadolu Ajansi (Dec. 3, 2023) \[Link\].
decomposition of bodies that cannot be retrieved for prolonged periods of time, and the lack of proper burials, inevitably contributes to the spread of epidemic diseases including blood-borne viruses (e.g. Hepatitis B and C, HIV), tuberculosis, and gastrointestinal infections.  

In the days leading up to the military siege of Al-Shifa hospital, an Israeli airstrike targeted a clearly marked ambulance of the PRCS. Israeli forces targeted a medical convoy of five marked ambulances transporting wounded patients from Al-Shifa hospital to Rafah, in the south. Médecins Sans Frontières (MSF) staff also reported multiple deliberate attacks against their evacuation convoys by Israeli forces. On November 18, 2023, two family members of MSF staff travelling in clearly identified MSF cars were targeted by the Israeli army. Israeli bulldozers also destroyed five MSF-marked vehicles and damaged an MSF clinic in Gaza City on November 20.

On November 22 and 23, Israeli forces arrested paramedics as they attempted to evacuate people from Al-Shifa hospital, and on November 23, the hospital’s director and his staff were also detained by Israeli forces while transporting patients with a WHO convoy. The UN also reported that the Israeli army detained “a convoy of ambulances transporting 190 wounded and sick patients from Al-Shifa Hospital to the south.” The PRCS warned that Israel’s obstruction of medical transports from northern Gaza puts “the lives of the wounded and sick people in danger.” When medical and rescue teams attempt to reach areas impacted by Israeli bombardment, with and without prior coordination with the occupying authorities, they are often targeted.

84 Euro-Med Human Rights Monitor, “As dead bodies remain scattered in streets and under rubble, a new health disaster looms over Gaza,” (Nov. 18, 2023) [Link].
85 Médecins Sans Frontières, “Gaza: Attack on ambulance outside Al-Shifa hospital,” News (Nov. 4, 2023) [Link].
86 Palestine Red Crescent Society, “Statement on the Israeli Occupation Forces shelling of the Ambulance Convoy transporting the injured from the aggression on Gaza toward Rafah crossing border,” (Nov. 3, 2023) [Link].
87 Médecins Sans Frontières, “MSF convoy attacked in Gaza: all elements point to Israeli army responsibility,” Press Release (Dec. 1, 2023) [Link].
88 Id. (“MSF staff also witnessed the destruction of a minibus, also clearly identified by the MSF logo, by an Israeli tank.”).
89 U.N. OHCA, “Hostilities in the Gaza Strip and Israel, Flash Update #48” (Nov. 23, 2023) [Link].
90 Aljazeera, “Israeli army arrests Al-Shifa Hospital director, other doctors in Gaza” (Nov. 23, 2023) [Link].
91 Palestinian Centre for Human Rights, Al-Haq and Al Mezan Center for Human Rights, “Civilians trapped under the rubble: medical and rescue teams denied access to IOF-deployed areas,” Press Release (Dec. 17, 2023) [Link].
3. The Israeli government’s complete closure of Gaza since October 7, 2023 has prevented life-saving medical assistance and volunteers from entering.

The devastating impact of Israel’s intentional bombing of essential infrastructure is further exacerbated by its punitive land, air, and sea blockade.\(^2\) Beyond the physical destruction of Gaza’s health sector, Israel’s restrictions on freedom of movement amid its raging military campaign have severely limited access to fuel, medical equipment, water, sanitation, and hygiene services which are crucial for the survival of any healthcare system. Despite pleas from the UN and aid organizations, Israel’s “complete siege” of Gaza following the October 7 attacks has elevated a pre-existing humanitarian crisis to catastrophic levels.\(^3\) Prior to October 7, Gaza required 500 trucks of humanitarian aid daily to provide medicine, aid workers, and medical equipment to support frontline clinics and healthcare units.\(^4\) Since Israel imposed a total siege on Gaza after October 7, 2023, very few trucks “carrying much-needed aid, fuel and cooking gas” have been allowed to enter Gaza through the Rafah crossing.\(^5\) The UN Special Rapporteur on the right to health, Tlaleng Mofokeng, warned that Gaza’s health sector is at a breaking point and urged the international community to intervene immediately to establish humanitarian corridors and facilitate “the entry of essential supplies into Gaza, including food, water, fuel, medicines, medical disposables, and equipment.”\(^6\)

II. THE ISRAELI GOVERNMENT’S ASSAULT ON GAZA’S HEALTH SYSTEM IS AN ACT OF GENOCIDE AGAINST THE PALESTINIAN PEOPLE

The Israeli government has clearly stated their intent to eliminate the Palestinian people in whole or in part, and has taken acts to achieve that objective. Specific acts of genocide can include killing members of the group, causing serious mental or bodily harm, and deliberately imposing

---

\(^2\) Public statements by Israeli Minister of Defense Yoav Gallant evince the punitive, destructive intentions behind its complete siege of Gaza. Democracy Now, “No Electricity, No Food, No Fuel’: U.N. Condemns ‘Complete Siege’of Gaza Strip” (Oct. 10, 2023) (“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”) [Link].


\(^5\) Aljazeera, “Gaza aid trucks stranded as Israel-Hamas war resumes” (Dec. 1, 2023) [Link].

\(^6\) OHCHR, “UN experts declaring Gaza health sector at a “breaking point”, Press Release” (Oct. 17, 2023) [Link].
conditions calculated to destroy the group. See Genocide Convention art. II; ICTR Statute art. 2(2)\textsuperscript{97}; ICTY Statute art. 4(2)\textsuperscript{98}; see also 18 U.S.C. § 1091 (a). According to the International Criminal Tribunal for Rwanda, “subjecting a group of people to a subsistence diet, systemic expulsion from homes and the reduction of essential medical services below the minimum requirement” can constitute acts of genocide.\textsuperscript{99} In this case, the group is the Palestinian people, and Israel’s systematic and deliberate attacks on the health sector have included targeted killing of health care professionals, causing extreme mental and bodily harm, putting them on a subsistence diet, systematically expelling them from their homes, and reducing medical services below the minimum required to sustain Palestinian life, thereby imposing conditions to destroy the group. The direct killing and harming of medical and health professionals not only constitutes an act of genocide in its own right, as an act of killing members of the target group, but also has the added effect of contributing to conditions calculated to destroy all Palestinians in Gaza by depriving them of essential life-sustaining medical care.

**CONCLUSION**

The Israeli government is committing a genocide against the Palestinian people, specifically through its deliberate assault on all aspects of life-sustaining health and medical services and infrastructure in Gaza. The defendants have a legal obligation to take action to prevent this ongoing genocide, and are liable for their failure to act, as well as for their complicity in this genocide.

Dated: December 29, 2023

Respectfully Submitted,

/s/ Mark Kleiman
Mark Kleiman, Cal. Bar No. 115919
Kleiman/Rajaram
12121 Wilshire Blvd., Ste. 810
Los Angeles, CA 90025
(310) 392-5455


\textsuperscript{99} Prosecutor v. Akayesu, Case No. ICTR-96-4-T, Trial Judgement, ¶ 505 (Sept. 2, 1998).
Counsel for Amici

Collin Poirot, pro hac vice motion pending
2603 Oak Lawn, Ste. 300
Dallas, TX 75219

Counsel for Amici
APPENDIX A – LIST OF AMICI

Karameh Kueammerle, M.D.
Pediatric Neurologist

Nidal Jboor, M.D.
Internist and Geriatric Medicine Specialist

Tanya Haj-Hassan, M.D.
Gaza Medic Voices

Clare Idehen, M.D.
Healthcare Workers for Palestine NYC

Bram Wispelwey, M.D.
Health for Palestine

Kathryn Himmelstein, M.D.
White Coats for Black Lives

Rachel Rubin, M.D.
Jewish Voice for Peace Health Advisory Council

Alan Meyers, M.D.
Jewish Voice for Peace Health Advisory Council

Trude Bennett, DrPH
Jewish Voice for Peace Health Advisory Council

Sima Kahn, M.D.
Jewish Voice for Peace Health Advisory Council

Alice Rothchild, M.D.
Jewish Voice for Peace Health Advisory Council

Maxine Fookson, M.N.
Jewish Voice for Peace Health Advisory Council

Bill Slaughter, M.D.
US Gaza Mental Health Foundation

Ibrahim Sablaban, D.O.
American Muslim Health Professionals

Roona Ray, M.D.
Physicians for a National Health Program
MaryLouise Patterson, M.D.  
Physicians for a National Health Program  

Yoongi Tom, M.D.  
DPH Must Divest  

Rupa Marya, M.D.  
Do No Harm Coalition  

Kate Sugarman, M.D.  
Doctors for Camp Closure  

Qaali Hussein, M.D.  
Defiance Academy  

Rita Giacaman, Honorary PhD  
Institute of Community and Public Health, Birzeit University  

Danya Qato, PhD  
University of Maryland  

Jim Recht, M.D.  
Harvard Medical School  

Lara Jirmanus, M.D.  
Harvard Medical School and T.H. Chan School of Public Health  

Jess Ghannam, Ph.D.  
University of California San Francisco  

Leigh Kimberg, M.D.  
University of California San Francisco  

Linda Rae Murray, M.D.  
University of Illinois School of Public Health  

Hosnieh Djafari-Marbini, M.D.  
Oxford University Hospitals  

Moira McCarty, M.D.  
Lincoln Hospital  

James Smith, M.D.  
Institute of Epidemiology and Health Care, University College London, London, UK  

Michel Khoury, M.D.  
Georgia Human Rights Clinic  

Alcy Torres, M.D.
Boston Medical Center

Ghassan S. Safadi, M.D.
Dr. Safadi & Associates, Inc.

Adeola Adelayo, M.D.
Adeola Adelayo, M.D. PLLC

Mariam Aboulela, M.D.
Obstetrics and Gynecology

Satya Sarma, M.D.
Internal Medicine Physician

Razan Al-Nahhas, D.O.
Emergency Medicine Physician

Jennifer Brody, M.D.
Internal Medicine Physician

Karim Sariahmed, M.D.
Internal Medicine Physician

Alaa Ali, M.D.
Family Medicine Attending

Liza Goldman Huertas, M.D.
Family Medicine Physician

Anna McCall, M.D.
Family Medicine Physician

Yakira Teitel, M.D.
Family Medicine Physician

Roxana Samimi, M.D.
Infectious Diseases

Rafia Baloch, M.D.
Pediatrician

Emily Antoon-Walsh, M.D.
Pediatrician

Damien Archbold, MBChB
Anesthesiologist
Jesse Addis, D.O.
Psychiatrist

Yazan Nagi, M.D.

Zubair Ahammad, M.D.

Monica Mitra Chaudhuri, M.D.

Manal Assi, M.D.

Joia S. Mukherjee, M.D.