

TO: Sundar Pichai
Chief Executive Officer
Google LLC, Alphabet Inc.

May 19, 2026

Thomas Kurian
Chief Executive Officer
Google Cloud

CC: Alex Walden, Global Head of Human Rights

Sent via Email

Re: Notice of Exposure to Liability for Involvement in Grave Human Rights Violations

Dear Mr. Pichai and Mr. Kurian,

We write to provide you with urgent notice that **Google LLC's ("Google") past and continued provision of products and services to Israel's military, intelligence, and other governmental branches provides a reasonable basis to conclude that Google facilitates Israel's commission of atrocity crimes and grave human rights violations against the Palestinian population of Gaza. Among other forms of support, it is well documented that Google has provided cloud storage, facial recognition, and artificial intelligence technologies, which have aided Israel in its violations of international law. This alleged facilitation of Israel's actions opens your company and its officers to significant civil and criminal liability in multiple jurisdictions, both in the United States and internationally, for aiding and abetting, contributing to, or otherwise being complicit in these crimes.**

We urge you, as executive officers of Google, to **take swift action rectifying any legal violations, including by immediately terminating the provision of any Google products or services that facilitate the Israeli government's violations of international law; initiating independent investigations to identify any further Google products or services which contribute to violations of international law and publicizing the results of any such investigation; and taking any additional steps to support those harmed in their pursuit of accountability, including by taking measures to provide restitution to those harmed.**

I. Factual Record

- 1. For More Than Two and a Half Years, Israel Has Committed Atrocity Crimes of Unprecedented Magnitude and Speed, Including Genocide, against the Palestinian People of Gaza*

Israel has a long history of brutal military campaigns directed against the Palestinian population of Gaza. Between 2008 and 2021, the Israeli military launched five separate, sustained assaults on Gaza, collectively killing thousands of Palestinians, destroying essential infrastructure, and

committing numerous other grave violations of international law.¹ In its latest—and by far most destructive—assault and siege, Israel has killed over 72,000 Palestinians and injured over 172,000 in a campaign of aerial bombardment, ground invasion, and blockade against the population of Gaza, beginning on October 7, 2023.² Researchers further estimate the true death toll to be much higher than official figures, with studies from as early as July 2024 calculating that 186,000 Palestinians, or nearly 8% of Gaza’s population, had potentially been killed.³ Israeli attacks have destroyed essential infrastructure, including hospitals, housing units, and refugee sites, on an unprecedented scale, displacing nearly the entire population of 2.2 million people, with many displaced multiple times, and triggering the rapid spread of disease, famine, and otherwise unlivable conditions throughout Gaza.⁴ Despite entering into a nominal ceasefire in mid-October 2025, Israel has continued to impose unbearable conditions on Palestinians in Gaza to the present day: since the beginning of the ostensible ceasefire, Israel has killed several hundred Palestinians, with Israeli attacks in Gaza coming on 190 of the first 214 days of the “ceasefire.”⁵ In the period since October 2025, the United Nations and journalists have reported

¹ See *Report of the United Nations Fact Finding Mission on the Gaza Conflict* (Goldstone Report), 12th Sess., Agenda Item 7, U.N. Doc. A/HRC/12/48 (25 Sept., 2009), <https://documents.un.org/doc/undoc/gen/g09/158/66/pdf/g0915866.pdf>; *Report of the United Nations High Commissioner for Human Rights on the implementation of Human Rights Council resolutions S-9/1 and S-12/1, Addendum: Concerns related to adherence to international human rights and international humanitarian law in the context of the escalation between the State of Israel, the de facto authorities in Gaza and Palestinian armed groups in Gaza that occurred from 14 to 21 November 2012*, ¶ 6, U.N. Doc. A/HRC/22/35/Add.1 (Mar. 6, 2013), https://www.ohchr.org/sites/default/files/Documents/HRBodies/HRCouncil/RegularSession/Session22/A.HRC.22.35.Add.1_AV.pdf; *Report of the detailed findings of the independent commission of inquiry established pursuant to Human Rights Council Resolution S-21/1*, 29th Sess., Agenda Item 7 (24 June, 2015), U.N. Doc. A/HRC/29/CRP.4, <https://docs.un.org/en/A/HRC/29/CRP.4>; *Report of the detailed findings of the independent international Commission of inquiry on the protests in the Occupied Palestinian Territory*, 40th Sess., Agenda Item 7 (18 Mar. 2019), U.N. Doc. A/HRC/40/CRP.2,

https://www.ohchr.org/sites/default/files/HRBodies/HRC/RegularSessions/Session40/Documents/A_HRC_40_74_CRP2.pdf; *Overview: November 2021*, OCHA (Nov. 3, 2021), <https://www.ochaopt.org/content/overview-november-2021>; *Complaint at ¶¶ 53-56, Defense for Children International – Palestine v. Biden*, No. 3:23-cv-5829 (N.D. Cal. Nov. 13, 2023), https://ccrjustice.org/sites/default/files/attach/2023/11/Complaint_DCI-Pal-v-Biden_ww.pdf.

² United Nations Relief and Works Agency for Palestine Refugees in the Near East (“UNRWA”), *UNRWA Situation Report #218 on the Humanitarian Crisis in the Gaza Strip and the Occupied West Bank, Including East Jerusalem*, (22 Apr. 2026), <https://www.unrwa.org/resources/reports/unrwa-situation-report-218-humanitarian-crisis-gaza-strip-and-occupied-west-bank>.

³ See Rasha Khatib, et al., *Counting the dead in Gaza: difficult but essential*, *The Lancet* (July 20, 2024), [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(24\)01169-3/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(24)01169-3/fulltext).

⁴ See United Nations, *Report: Gaza Strip Rapid Damage and Needs Assessment – European Union, United Nations and World Bank* (20 Apr. 2026), <https://www.un.org/unispa/document/report-gaza-strip-rapid-damage-20apr26/>; *Famine confirmed for first time in Gaza*, World Health Organization (“WHO”), (22 Aug. 2025), <https://www.who.int/news/item/22-08-2025-famine-confirmed-for-first-time-in-gaza>; United Nations Relief and Works Agency for Palestine Refugees in the Near East (“UNRWA”), *UNRWA Situation Report #187 on the Humanitarian Crisis in the Gaza Strip and the Occupied West Bank, Including East Jerusalem*, (5 Sept. 2025), <https://www.unrwa.org/resources/reports/unrwa-situation-report-187-situation-gaza-strip-and-west-bank-including-east-jerusalem>.

⁵ See *How many times has Israel violated the Gaza ceasefire? Here are the numbers*, Aljazeera (last updated 11 May 2026), <https://www.aljazeera.com/news/2025/11/11/how-many-times-has-israel-violated-the-gaza-ceasefire-here-are-the-numbers>.

Israeli “gunfire, artillery shelling, and airstrikes” across Gaza; thousands of destroyed buildings; and the continued restriction of life-saving aid to Gaza’s population.⁶

Within months of Israel’s initial 2023 assault on Gaza, international and domestic courts found it plausible that Israel’s actions constituted genocide. By January 2024, the International Court of Justice (“ICJ”) concluded it was plausible that Israel was committing a genocide against the Palestinian people of Gaza.⁷ Along with these findings, the ICJ issued provisional measures to protect civilians, which it later supplemented with additional measures against Israel in March and May of 2024.⁸ In January 2024, a U.S. federal district court likewise opined that it would be plausible to conclude that Israel was committing genocide.⁹

Of particular relevance here, Israel’s actions in Gaza have been described as the world’s first “AI-powered genocide,” enabled on a fundamental level by the technology sector.¹⁰ Israel reportedly uses artificial intelligence (“AI”) tools to generate enormous “target” lists instantaneously, including information like the number of civilians present at a potential target, meaning that the Israeli military is aware of the number of civilians it would kill in a given attack.¹¹ Further, vast digital storage capacity enables the Israeli military to indefinitely store invasive surveillance information on virtually the entire Palestinian population.¹² Israeli military

⁶ See United Nations Office of the High Commissioner for Human Rights, *UN experts urge States to act as Israeli violations threaten fragile Gaza ceasefire* (24 Nov., 2025), <https://www.ohchr.org/en/press-releases/2025/11/un-experts-urge-states-act-israeli-violations-threaten-fragile-gaza>; Samuel Granados, et al., *Israel Is Still Demolishing Gaza, Building by Building*, N.Y. Times (12 Jan. 2026), <https://www.nytimes.com/interactive/2026/01/12/world/middleeast/israel-cease-fire-gaza-demolition.html> (finding, as of January 2026, more than 2,500 buildings destroyed by Israel during ceasefire); Benedict Garman & Barbara Metzler, *Israel has destroyed more than 1,500 buildings in Gaza since ceasefire*, BBC (11 Nov. 2025), <https://www.bbc.com/news/articles/c0mxy1xw48yo>; United Nations Office of the High Commissioner for Human Rights, *Israel: Ban on 37 aid groups makes life unbearable for genocide survivors in Palestine, say UN experts* (15 Jan. 2026), <https://www.ohchr.org/en/press-releases/2026/01/israel-ban-37-aid-groups-makes-life-unbearable-genocide-survivors-palestine>.

⁷ See ICJ, *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (S.A. v. Israel)*, Order, (26 Jan. 2024), <https://www.icj-cij.org/sites/default/files/case-related/192/192-20240126-ord-01-00-en.pdf>.

⁸ See *id.*; ICJ, *Additional provisional measures. Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (S.A. v. Israel)*, Order, (28 Mar. 2024), <https://www.un.org/unispal/document/icj-order-gaza-genocide-covention-28mar24/>; ICJ, *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (S.A. v. Israel)*, Order, (24 May 2024), <https://www.un.org/unispal/wp-content/uploads/2024/05/192-20240524-ord-01-00-en.pdf>.

⁹ *Defense for Children International-Palestine v. Biden*, 714 F. Supp. 3d 1160, 1163 (N.D. Cal. 2024).

¹⁰ See Michael Kwet, *How US Big Tech supports Israel’s AI-powered genocide and apartheid*, Aljazeera (12 May 2024), <https://www.aljazeera.com/opinions/2024/5/12/how-us-big-tech-supports-israels-ai-powered-genocide-and-apartheid>; TRT World, *‘This is the first AI-powered genocide,’ say US tech workers*, YouTube (11 Mar. 2026), <https://www.youtube.com/shorts/vUAPStJhIss>.

¹¹ See Yuval Abraham, *‘A mass assassination factory’: Inside Israel’s calculated bombing of Gaza*, +972 Magazine (30 Nov. 2023), <https://www.972mag.com/mass-assassination-factory-israel-calculated-bombing-gaza/>; Yuval Abraham, *‘Lavender’: The AI machine directing Israel’s bombing spree in Gaza*, +972 Magazine (3 Apr. 2024), <https://www.972mag.com/lavender-ai-israeli-army-gaza/>.

¹² See Yuval Abraham, *‘Order from Amazon’: How tech giants are storing mass data for Israel’s war*, +972 Magazine (4 Aug. 2025), <https://www.972mag.com/cloud-israeli-army-gaza-amazon-google-microsoft/>; Harry Davies & Yuval Abraham, *‘A million calls an hour’: Israel relying on Microsoft cloud for expansive surveillance of Palestinians*, Guardian (6 Aug. 2025), <https://www.theguardian.com/world/2025/aug/06/microsoft-israeli-military-palestinian-phone-calls-cloud>; Yuval Abraham, *Microsoft storing Israeli intelligence trove used to attack*

sources have admitted using their vast surveillance repositories to manufacture justifications for arrests and military strikes, making every surveilled Palestinian a potential target.¹³ In the words of one former Israeli intelligence officer, the combined impact of these advanced technologies turned Israeli operations in Gaza into an automated “mass assassination factory.”¹⁴ This massive reach and speed have allowed the Israeli military to inflict unprecedented destruction on Gaza: in November 2025, researchers estimated that the collective lost life-expectancy of those directly killed by Israeli strikes in Gaza totaled over 3 million years.¹⁵

Google possesses longstanding knowledge—both direct and indirect—that Israel has been committing these crimes against the Palestinian population of Gaza. As detailed below, despite this notice, Google has continued to provide extensive products and services to Israeli forces, repeatedly expanding and prioritizing its support to Israel during the genocide and enabling Israel to carry out the gravest of crimes in Gaza.

2. *Google Played an Essential Role in Israel’s Crimes and Repeatedly Advanced its Partnership with Israel as the Genocidal Campaign Progressed*

a. *Project Nimbus*

Project Nimbus is an overarching contractual framework providing the Israeli government with cloud computing services, including AI and machine learning programs.¹⁶ In April 2021, after a multi-year bidding process, the Israeli government announced Google and Amazon Web Services (“AWS”) as joint winners of the Project Nimbus contract.¹⁷ Since winning the contract, Google has faced sustained, large-scale protests from workers opposing the provision of services to the Israeli military through Project Nimbus.¹⁸ Despite these efforts, Google has collaborated closely with the Israeli government to both develop physical cloud infrastructure and provide cloud and AI products to Israeli government entities. On October 19, 2022, Google announced

Palestinians, +972 Magazine, (6 Aug. 2025), <https://www.972mag.com/microsoft-8200-intelligence-surveillance-cloud-azure/>.

¹³ See Davies & Abraham, ‘A million calls an hour’, *supra* n.12.

¹⁴ See Abraham, ‘A mass assassination factory’, *supra* n.11.

¹⁵ Sammy Zahran & Ghassan Abu-Sittah, *Over 3 million life-years lost in Gaza*, *The Lancet* (15 Nov. 2025), [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(25\)02112-9/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(25)02112-9/fulltext).

¹⁶ See Yuval Abraham, ‘No restrictions’ and a secret ‘wink’: Inside Israel’s deal with Google, Amazon <https://www.972mag.com/project-nimbus-contract-google-amazon-israel/>; Caroline Haskins, *The Hidden Ties Between Google and Amazon’s Project Nimbus and Israel’s Military*, *Wired* (15 July 2024), <https://www.wired.com/story/amazon-google-project-nimbus-israel-idf/>.

¹⁷ See Amitai Ziv, *Israel Picks Google, Amazon for Massive Official Cloud; ‘Data Will Remain Here’*, *Haaretz* (21 Apr. 2021), <https://www.haaretz.com/israel-news/tech-news/2021-04-21/ty-article/israel-picks-google-amazon-for-official-state-cloud/0000017f-e896-dc91-a17f-fc9fd1ce0000>; Haskins, *The Hidden Ties*, *supra* n.16.

¹⁸ See *We are Google and Amazon workers. We condemn Project Nimbus*, *Guardian* (12 Oct. 2021), <https://www.theguardian.com/commentisfree/2021/oct/12/google-amazon-workers-condemn-project-nimbus-israeli-military-contract>; Sam Biddle, *Google and Amazon Face Shareholder Revolt over Israeli Defense Work*, *The Intercept* (18 May 2022), <https://theintercept.com/2022/05/18/google-amazon-israel-military-nimbus/>; Richard Nieva, *Google and Amazon Workers Protest Their Companies’ \$1.2 Billion AI Contract with Israel*, *Forbes* (9 Sept. 2022), <https://www.forbes.com/sites/richardnieva/2022/09/09/google-and-amazon-protest-project-nimbus-ai-contract-israel/>. Mithil Aggarwal, *Google fires 28 workers for protesting \$1.2 billion Israel contract*, *NBC News* (18 Apr. 2024), <https://www.nbcnews.com/news/us-news/google-fires-workers-protest-israel-contract-project-nimbus-rcna148333>.

the opening of its new Google Cloud region in Tel Aviv, composed of several physical data centers that greatly increased the cloud capacity of government entities within Israel.¹⁹ Under the terms of Nimbus, Google and AWS also established a “digital marketplace” of services available specifically to the Israeli Ministry of Defense and the Israeli military.²⁰

b. Google’s Technology Enables Genocide to Take Place at Great Speed and Scale

The Google and AWS products provided through Project Nimbus have been critical to Israel’s ability to commit genocide and other serious violations of international law, including war crimes. By its own admission, the Israeli military could not have sustained the speed and scale of the genocide in Gaza without the support of cloud and AI providers including Google.²¹ Through Nimbus, Google provides extensive AI tools to Israel which its military and contractors have used in its targeting operations in Gaza.²² Despite the company being on notice that its tools were being used to enable a military campaign that has resulted in civilian deaths, destruction, displacement, and the denial of basic necessities for life, Google has continually increased the services that it provides throughout the genocide and its employees have repeatedly escalated and emphasized the urgency of Israeli military requests for expanded AI access.²³

The Nimbus contract also requires that government entities labelled “obligatory customers” purchase their cloud computing needs exclusively from Google and AWS.²⁴ Two prominent obligatory customers are Rafael Advanced Defense Systems Ltd. (“Rafael”) and Israel Aerospace Industries (“IAI”), both major Israeli state-owned weapons manufacturers that, respectively, produce deadly missiles and drone surveillance systems, and have been integral to the Israeli military’s operations, including the commission of grave crimes in Gaza.²⁵

Through its ongoing provision of services, Google has provided support to Israel’s genocide, crimes against humanity, and war crimes in a number of additional ways. For example, through a series of contracts signed during Israel’s genocidal campaign, Google has acted as a major platform for the Israeli government to disseminate pro-genocide propaganda.²⁶ Google has

¹⁹ See Boaz Moaz, *The new Google Cloud Region in Israel is now open* (19 Oct. 2022), <https://cloud.google.com/blog/products/infrastructure/new-google-cloud-region-in-israel-is-now-open>; Abraham, ‘Order from Amazon’, *supra* n.12.

²⁰ See Haskins, *The Hidden Ties*, *supra* n.16.

²¹ See, e.g., Abraham, ‘Order from Amazon’, *supra* n.12; Abolitionist Law Center, *Submission to the United Nations Special Rapporteur on the Situation of Human Rights in the Palestinian Territories Occupied Since 1967*, 7-9 (Nov. 28, 2024), <https://abolitionistlawcenter.org/wp-content/uploads/2024/12/Abolitionist-Law-Center-Submission-to-UN-Special-Rapporteur-on-the-Situation-of-Palestine.pdf>; Haskins, *The Hidden Ties*, *supra* n.16.

²² See, e.g., Gerrit De Vynck, *Google helped Israeli military contractor with AI, whistleblower alleges*, Washington Post (1 Feb. 2026), <https://www.washingtonpost.com/technology/2026/02/01/google-ai-israel-military/>; Haskins, *The Hidden Ties*, *supra* n.16.

²³ See, e.g., Gerrit De Vynck, *Google rushed to sell AI tools to Israel’s military after Hamas attack*, Washington Post (21 Jan. 2025), <https://www.washingtonpost.com/technology/2025/01/21/google-ai-israel-war-hamas-attack-gaza/>.

²⁴ See Sam Biddle, *Israeli Weapons Firms Required to Buy Cloud Services from Google and Amazon*, The Intercept (1 May 2024), <https://theintercept.com/2024/05/01/google-amazon-nimbus-israel-weapons-arms-gaza/>.

²⁵ See *id.*; Rafael, <https://www.rafael.co.il/>; IAI, <https://www.iai.co.il/>.

²⁶ See Jack Poulson & Lee Fang, *Google’s \$45 Million Contract with Netanyahu’s Office to Spread Israeli Propaganda*, Drop Site News (3 Sept. 2025), <https://www.dropsitenews.com/p/google-youtube-netanyahu-israel->

elevated—in the midst of what experts described as “irrefutably” a famine—Israeli government advertisements making statements such as, “There is food in Gaza. Any other claim is a lie.”²⁷ Additionally, according to reports from March and April 2024, the Israeli military has used Google’s facial recognition technology, provided through Google Photos, to identify the faces of Palestinians captured in surveillance photos and build a “hit list” of targets for arrest or killing.²⁸ As Israel prepared for a major ground invasion of Gaza in late October 2023, Google also disabled real-time traffic data from Google Maps and Google subsidiary Waze in Israel and Gaza, helping the Israeli military conceal its movements from the Palestinian population.²⁹

II. Google’s Past and Continued Provision of Services to Israel Breaches Domestic and International Law

Complicity in genocide violates customary international law and the Convention on the Prevention and Punishment of the Crime of Genocide (“Genocide Convention”).³⁰ Genocide, aiding and abetting genocide, and conspiracy to commit genocide are also federal crimes, as are the commission of, or aiding and abetting, war crimes, as detailed below. International law, including human rights, criminal, and humanitarian law, applies to both individuals and corporations.³¹ Business entities, like natural persons, are obligated to abide by international law and can be held responsible for violations, notwithstanding other contextual factors such as States’ willingness to adhere to their own human rights and legal obligations.³²

[propaganda-gaza-famine](https://www.business-humanrights.org/en/latest-news/israels-google-ads-campaign-against-unrwa-raises-misinformation-concerns-criticism-report-reveals/); *Israel’s Google ads campaign against UNRWA raises misinformation concerns & criticism, report reveals*, Business and Human Rights Centre (27 Aug. 2024), <https://www.business-humanrights.org/en/latest-news/israels-google-ads-campaign-against-unrwa-raises-misinformation-concerns-criticism-report-reveals/>.

²⁷ Poulson & Fang, *Google’s \$45 Million Contract*, *supra* n.26; United Nations, *Gaza: Famine “irrefutably” confirmed, UN humanitarians unite in plea for aid success – OCHA, OHCHR, WFP and WHO* (22 Aug. 2025), <https://www.un.org/unispal/document/ocha-ohchr-wfp-who-press-briefing-22aug25/>; Integrated Food Security Phase Classification, *Famine Review Committee: Gaza Strip, August 2025* (22 Aug. 2025), https://www.un.org/unispal/wp-content/uploads/2025/08/IPC_Famine_Review_Committee_Report_Gaza_Aug2025-compressed.pdf.

²⁸ Sam Biddle, *Google Won’t Say Anything About Israel Using Its Photo Software to Create Gaza “Hit List,”* *The Intercept* (5 Apr. 2024), <https://theintercept.com/2024/04/05/google-photos-israel-gaza-facial-recognition/>; Sheera Frenkel, *Israel Deploys Expansive Facial Recognition Program in Gaza*, *N.Y. Times* (27 Mar. 2024), <https://www.nytimes.com/2024/03/27/technology/israel-facial-recognition-gaza.html>.

²⁹ Marissa Newman, *Google Maps Disables Live Traffic Data in Israel, Gaza at Military Request*, *Yahoo! Finance* (23 Oct. 2023), <https://finance.yahoo.com/news/google-maps-disables-live-traffic-182528689.html>.

³⁰ See Convention on the Prevention and Punishment of the Crime of Genocide, art. III, Dec. 9, 1948, 78 U.N.T.S. 277; *Universal Jurisdiction: The duty of states to enact and enforce legislation: Chapter 7: Genocide: The legal basis for universal jurisdiction*, 3, Amnesty International (31 Aug. 2001), <https://www.amnesty.org/en/documents/ior53/010/2001/en/> (“These provisions of the Genocide Convention, which has a large number of ratifications, reflect customary law.”).

³¹ See generally, Office of the United Nations High Commissioner for Human Rights, *Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework* (“UNGP”), #12 (commentary), #14, U.N. Doc. HR/PUB/11/04 (2011).

³² See, e.g., *Al Shimari v. CACI Premier Tech., Inc.*, 170 F.4th 162, 187 (4th Cir. 2026); UNGP, *supra* n.31, at #12 (commentary), #14.

Notably, a direct violation of human rights laws is not required to establish Google’s legal liability: it can also be held liable for aiding and abetting or conspiring to commit genocide.³³ As set out herein, there is a reasonable basis to conclude that Google provided and continues to provide products and services which the company knew could have a substantial effect on Israel’s commission of crimes in Gaza. This knowing, substantial assistance exposes Google to liability, at the very least, for aiding and abetting genocide, along with the many other international crimes that Israel has committed, and continues to commit, against the Palestinian population of Gaza.

1. Evidence Google Knowingly Provided Products and Services Furthering Israeli Crimes in Gaza

As demonstrated herein, Google’s knowledge of Israel’s tech-enabled genocide, crimes against humanity, and war crimes came through multiple sources, including rulings by the International Court of Justice,³⁴ the International Criminal Court’s issuance of arrest warrants against Israeli officials (including the Prime Minister),³⁵ findings by a U.S. District Court and human rights organizations,³⁶ warnings by United Nations officials,³⁷ Google executives’ own engagement in the contract negotiation process,³⁸ and internal employee advocacy.³⁹

³³ See, e.g., UNGP, *supra* n.31, at #13, #13 (commentary); *Nestlé USA, Inc. v. Doe*, 593 U.S. 628 (2021) (contemplating the possibility of corporate aiding and abetting liability under the Alien Tort Statute); *Al Shimari v. CACI Premier Tech., Inc.*, 170 F.4th 162 (4th Cir. 2026) (affirming the cognizability of corporate aiding and abetting liability); *Trial of Bruno Tesch and Two Others* (“Zyklon B Case”), British Military Court, Hamburg, 1–8 March 1946, Vol. I, Law Reports, 93 (1946) (convicting businessmen of war crimes for providing products used to perpetrate Holocaust).

³⁴ See ICJ, *Application of the Convention* (Order, 26 Jan. 2024), *supra* n.7; ICJ, *Additional provisional measures* (Order, 28 Mar. 2024), *supra* n.8; ICJ, *Application of the Convention* (Order, 24 May 2024), *supra* n.8.

³⁵ See United Nations, *International Criminal Court issues arrest warrants: Pre-Trial Chamber I rejects Israel’s challenges to jurisdiction and issues warrants of arrest for Benjamin Netanyahu and Yoav Gallant*, (21 Nov. 2024), <https://www.un.org/unispal/document/icc-arrest-warrant-netanyahu-21nov24/>.

³⁶ See *Defense for Children International-Palestine v. Biden*, 714 F.Supp.3d 1160 (N.D. Ca. 2024); Amnesty International, *Amnesty International investigation concludes Israel is committing genocide against Palestinians in Gaza* (5 Dec. 2024), <https://www.amnesty.org/en/latest/news/2024/12/amnesty-international-concludes-israel-is-committing-genocide-against-palestinians-in-gaza/>; Human Rights Watch, *Israel’s Crime of Extermination, Acts of Genocide in Gaza* (19 Dec. 2024), <https://www.hrw.org/news/2024/12/19/israels-crime-extermiation-acts-genocide-gaza>.

³⁷ See, e.g., Francesca Albanese (Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967), *Anatomy of a genocide*, U.N. Doc. A/HRC/55/73 (1 July 2024) (“The overwhelming nature and scale of the Israeli assault on Gaza and the destructive conditions of life it has inflicted reveal an intent to physically destroy Palestinians as a group. The present report finds that there are reasonable grounds to believe that the threshold indicating the commission of . . . acts of genocide against Palestinians in Gaza has been met . . .”); United Nations, *‘Entire population of north Gaza at risk of dying,’ warns UN’s top humanitarian official*, (26 Oct. 2024) <https://news.un.org/en/story/2024/10/1156171> (warning of the Israeli military’s “blatant disregard for basic humanity and for the laws of war” in Gaza).

³⁸ See, e.g., Sam Biddle, *Google Worried It Couldn’t Control How Israel Uses Its Project Nimbus, Files Reveal*, The Intercept (12 May 2025), <https://theintercept.com/2025/05/12/google-nimbus-israel-military-ai-human-rights/>.

³⁹ See, e.g., Billy Perrigo, *Exclusive: Google Workers Revolt Over \$1.2 Billion Contract With Israel*, TIME (19 Jan. 2026), <https://time.com/6964364/exclusive-no-tech-for-apartheid-google-workers-protest-project-nimbus-1-2-billion-contract-with-israel/>; No Tech for Apartheid (@NoTechApartheid), X (Apr. 16, 2024 12:55 PM), <https://x.com/NoTechApartheid/status/1780278895058518468?s=20>; Catherine Thorbecke, *Google has fired 50*

Google’s own preliminary assessments of, and involvement in, the contract negotiations for Project Nimbus serve as further evidence of notice. The Nimbus contract is exempted from Google’s generally-applicable terms of service, which would have ordinarily prohibited uses of Google technology “that can cause death, serious harm, or injury to individuals or groups of individuals.”⁴⁰ Instead, Project Nimbus is governed by “Adjusted Terms of Service” created in collaboration with the Israeli government.⁴¹ In the process of considering the Nimbus contract, Google executives were provided more than one report which included findings by both internal and external consultants who recommended that Google withhold certain technologies from the Israeli military due to the risk that they would be used to commit human rights violations.⁴²

Further, Google joined the Nimbus contract following years of large-scale Israeli attacks on Gaza which had prompted several investigations into Israel’s crimes by major international bodies.⁴³ The 2021 announcement that Google had secured the contract came just days before the Israeli military commenced sustained bombardment of Gaza, killing hundreds of Palestinians, including dozens of children.⁴⁴

2. Evidence Google Provided Israel with Practical Assistance Having a Substantial Effect on Israel’s Commission of Crimes in Gaza

The products and services Google has provided to the Israeli military have had a substantial effect on Israel’s ability to commit crimes—including genocide, crimes against humanity, and war crimes—sufficient to expose Google itself to legal liability for complicity in such crimes. As set out above, Israeli military officials have confirmed the importance of Project Nimbus in Israeli military operations in Gaza.⁴⁵ As set out above, Israel’s operations in Gaza have resulted in grave harms to Palestinian civilians, including genocide. Without the cloud and AI tools provided by tech companies, including Google, Israel’s internal military systems would have been incapable of handling the scale of Israel’s genocidal campaign.⁴⁶ Google continued to expand and enhance Israel’s access to its tools throughout the genocide, urgently responding to requests to prevent Israel from turning to competitors.⁴⁷ Along with the cloud storage and AI services provided through Nimbus, Google has continued to provide significant support to

employees after protests over Israel cloud deal, organizers say, CNN (23 Apr. 2024),

<https://www.cnn.com/2024/04/23/tech/google-fires-employees-protest-israel/>.

⁴⁰ Sam Biddle, *Documents Contradict Google’s Claims About Its Project Nimbus Contract with Israel*, The Intercept (2 Dec. 2024), <https://theintercept.com/2024/12/02/google-project-nimbus-ai-israel/>.

⁴¹ *Id.*; Abraham, “No restrictions”, *supra* n.16.

⁴² See Biddle, *Google Worried*, *supra* n.38; Nico Grant, *Google Worried Israeli Contract Could Enable Human Rights Violations*, N.Y. Times (3 Dec. 2024), <https://www.nytimes.com/2024/12/03/technology/google-israel-contract-project-nimbus.html>.

⁴³ See, e.g., Complaint at n.4, ¶¶ 53-55, *Defense for Children International – Palestine v. Biden*, No. 3:23-cv-5829 (N.D. Cal. Nov. 13, 2023), https://ccrjustice.org/sites/default/files/attach/2023/11/Complaint_DCI-Pal-v-Biden_wv.pdf.

⁴⁴ See *Israel/OPT: Pattern of Israeli attacks on residential homes in Gaza must be investigated as war crimes*, Amnesty International (17 May 2021), <https://www.amnesty.org/en/latest/press-release/2021/05/israelopt-pattern-of-israeli-attacks-on-residential-homes-in-gaza-must-be-investigated-as-war-crimes/>.

⁴⁵ See, e.g., Abolitionist Law Center, *Submission to the United Nations Special Rapporteur*, *supra* n.21 at 7.

⁴⁶ See Abraham, “Order from Amazon”, *supra* n.12.

⁴⁷ See de Vynck, *Google rushed to sell AI tools to Israel’s military*, *supra* n.23.

Israel’s military campaign, including by allowing Israel to use Google’s facial recognition technology to target Palestinians for detention and torture.⁴⁸ Google has also hosted advertisements by the Israeli government which made false claims as part of a deliberate campaign to sway public opinion in favor of its campaign in Gaza.⁴⁹ Through its support to Israel’s military apparatus, Google has been an essential actor in Israel’s commission of grave crimes in Gaza, far exceeding the “substantial effect” needed to establish aiding and abetting liability.

3. *Applicable U.S. Legal Provisions, ICC Jurisdiction, and Universal Jurisdiction*

There exists a reasonable basis to hold Google and/or its individual employees civilly liable in U.S. federal courts under federal law for aiding and abetting the Israeli military’s commission of violations in Gaza, including for genocide, war crimes, and crimes against humanity under the Alien Tort Statute, 28 U.S.C. § 1350, and its officers for extrajudicial killings and torture under the Torture Victim Protection Act, 28 U.S.C. § 1350 (note), among other federal laws. The Google corporate entity has also exposed itself—along with its individual officers, representatives, and agents—to civil liability in U.S. courts for aiding and abetting state law violations, including, but not limited to, assault, battery, wrongful death, false imprisonment, and intentional infliction of emotional distress, as well as the commission of unfair business practices. Google and its officers likewise face potential criminal liability in U.S. federal courts pursuant to the Genocide Convention Implementation Act,⁵⁰ the War Crimes Act,⁵¹ and federal statutes governing accessory liability.⁵² Individual Google officers face a further risk of investigation and prosecution at the International Criminal Court for aiding and abetting or otherwise being complicit in genocide, war crimes, and crimes against humanity.⁵³

These legal risks are not limited jurisdictionally to the United States or the ICC. In Europe, beyond domestic criminal laws for war crimes, crimes against humanity, and genocide, Google may also be exposing itself to significant liability under laws such as the European General Data Protection Regulation (“GDPR”).⁵⁴ To the extent that Google controls or processes the protected data of Palestinians, collected without their consent by Israel, Google can be held liable under the GDPR, with fines of up to four percent of Google’s annual turnover from the previous financial year.⁵⁵ In addition, and potentially with farther-reaching implications, the prohibitions against genocide, war crimes, and crimes against humanity constitute universal *jus cogens* norms in international law—norms so fundamental that they cannot be displaced by treaty or custom.⁵⁶

⁴⁸ See Biddle, *Google Won’t Say Anything*, *supra* n.28; Frenkel, *Israel Deploys*, *supra* n.28.

⁴⁹ See, e.g., Poulson & Fang, *Google’s \$45 Million Contract*, *supra* n.26.

⁵⁰ 18 U.S.C. § 1091.

⁵¹ 18 U.S.C. § 2441.

⁵² See 18 U.S.C. § 2.

⁵³ See Rome Statute of the International Criminal Court (“Rome Statute”), arts. 5, 25, July 17, 1998, 2187 U.N.T.S. 38544.

⁵⁴ See General Data Protection Regulation (“GDPR”), 2016 O.J. (L 119).

⁵⁵ See *id.* arts. 3, 5, 6(1), 9, 83(5). Google’s annual turnover for 2025 was over \$400 billion, meaning that a 4% GDPR fine would be over \$16 billion. Alphabet Inc., Form 10-K, at p. 87 (4 Feb. 2026), <https://www.sec.gov/Archives/edgar/data/1652044/000165204426000018/goog-20251231.htm>.

⁵⁶ See Abolitionist Law Center, *Submission to the United Nations Special*, *supra* n.21 at 14 (citing ICJ, *Legal Consequences Arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, Including East Jerusalem*, Advisory Opinion (July 19, 2024), ¶ 274, <https://www.icj-cij.org/sites/default/files/case->

Jus cogens norms are binding on *all* States at *all* times.⁵⁷ Accordingly, these norms create obligations *erga omnes*—obligations owed to the international community as a whole—on all States to prevent and punish the commission of such crimes.⁵⁸ Violations of *jus cogens* norms are therefore subject to the principle of universal jurisdiction, meaning that **the potential claims against Google, its individual officers, representatives, and agents, are not limited to the specific jurisdictions discussed above. Under international law, any country may, in principle, prosecute any and all perpetrators of these crimes at any time.**⁵⁹

As set out herein, there exists a reasonable basis to conclude that Google and its individual officers have knowingly provided the Israeli military with products and services having a substantial effect on the Israeli government’s campaign of genocide and other atrocity crimes committed against the Palestinian people of Gaza. As Google and its officers have long possessed knowledge of these crimes, Google’s provision of technology to the Israeli military exposes you and your company to significant criminal and civil liability, including for aiding and abetting, contributing to, or otherwise being complicit in Israel’s commission of atrocity crimes and grave human rights violations against the Palestinian population of Gaza.

As such, we the undersigned legal organizations urge you to **take any and all measures necessary to rectify your company’s involvement in the Israeli government’s violations of international law, including:**

- (1) immediate termination of all products and services used to facilitate Israel’s commission of international law violations in Gaza;**
- (2) a thorough, independent investigation to identify other Google products and services which may contribute to violations of international law, the publicization of the results of any such investigations, and concrete steps taken to remedy any identified harms, including terminating provision of products and services to identified customers and implementation of contractual safeguards to prevent the use of Google products to commit violations of international law; and**

[related/186/186-20240719-adv-01-00-en.pdf](#); ICJ Order (Jan. 26, 2024), *supra* n.7, at ¶ 33)); ILC, *Report of the International Law Commission*, “Chapter V: Preemptory norms of general international law (*jus cogens*),” U.N. Doc. A/74/10 (20 Aug. 2019).

⁵⁷ See Abolitionist Law Center, *Submission to the United Nations Special*, *supra* n.21 at 14 (citing ICJ, *Legal Consequences Arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, Including East Jerusalem*, Advisory Opinion (July 19, 2024), ¶ 274, <https://www.icj-cij.org/sites/default/files/case-related/186/186-20240719-adv-01-00-en.pdf>; ICJ Order (Jan. 26, 2024), *supra* n.7, at ¶ 33)); ILC, *Report of the International Law Commission*, “Chapter V: Preemptory norms of general international law (*jus cogens*),” U.N. Doc. A/74/10 (20 Aug. 2019).

⁵⁸ See ILC, *Report of the International Law Commission*, *supra* n.56.

⁵⁹ See, e.g., Eur. Ctr. for Const. & Hum. Rts., *Universal Jurisdiction in Germany? The Congo War Crimes Trial: First Case under Code of Crimes against International Law* 4 (8 June 2016), https://www.ecchr.eu/fileadmin/Juristische_Dokumente/Report_Executive_Summary_FDLR_EN.pdf (“Under the principle of universal jurisdiction, every state is authorized to prosecute cases of international crimes regardless of where they were committed or who the perpetrators are, especially in cases in which those crimes would go unpunished in the state where they were committed or the home state of the perpetrators”).

(3) supporting those harmed by human rights and international law violations committed using Google products and services in their pursuit of accountability and justice, including by taking measures to provide restitution to those harmed.

Sincerely,

Abolitionist Law Center
Center for Constitutional Rights
Tech Justice Law Project