

**Law Office of
Terry Jonathan Lodge**

316 North Michigan Street, Ste. 520
Toledo, Ohio 43604-5627
lodgelaw@yahoo.com

Phone (419) -----
Fax (419) 932-6625

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Chair Jim Hoops
Ohio House Development Committee
OHRDevelopmentCommittee@ohiohouse.gov
and Zachary.Groome@ohiohouse.gov

**Written Opponent Testimony of Terry J. Lodge, Esq.
On behalf of Northwest Ohio Peace Coalition:
Opposing HB 188 , “Creating an Ohio-Israel Trade and Innovation Partnership”
Before the Ohio House Development Committee**

Chair Hoops, Vice Chair Lorenz, Ranking Member Brownlee, and members of the Development Committee:

My name is Terry J. Lodge. I am a lawyer licensed to practice in Ohio and I’m testifying on behalf of the Northwest Ohio Peace Coalition (“NWOPC”), a 24-year-old organization made up of over 100 Ohio voters and supporters of peace with justice, located in the greater Toledo, Ohio area.

NWOPC opposes HB 188, the proposed Ohio-Israel Trade and Innovation Partnership (“Partnership”). We believe that the bill’s supporters do not adequately appreciate the negative political and legal implications of an economic partnership with the nation of Israel at present.

The Partnership’s mission would be to study and promote trade, investment and policy ties between Ohio and Israel, focusing on bilateral trade, business and academic exchanges, infrastructure projects, emerging technologies (spyware), and multilateral deals involving Israel and other regions. The public perception of many is that this new Ohio-Israel commercial relationship is meant to rehabilitate the image of Israel, seen by the community of nations as a genocidal apartheid state and perpetrator of a dramatic series of regional wars in the Middle East. The vortex of these wars is the continuing genocidal massacre of thousands of Palestinians to thwart foundation of a Palestinian nation. HB 188 would appropriate millions of taxpayer dollars annually for the partnership and would create a commission at the Ohio end made up of pro-Israel legislators, representatives of the state-chartered JobsOhio corporation, and the private sector.

These are not normal times where the nation of Israel is concerned; creation of the Partnership brings along controversy. We submit that passage of HB 188 into law could place members of the General Assembly and the Ohio state government, as well as JobsOhio staff and board and others, at risk of criminal and civil liability for complicity with Israel in causing genocide, war crimes and crimes against humanity under international law. Implementation of murky trade relationships that directly or

indirectly enable Israel's continuing war effort could subject Ohioans in government and the private sector to investigation and even potential prosecution at the International Criminal Court or in third states acting under the principle of universal jurisdiction.

I. Israel Is Committing Genocide In The Gaza Strip

Since Israel launched its military assault and siege on Gaza following the attacks of October 7, 2023, the Israeli military has killed at least 68,234 fatalities and caused another 170,373 injuries.¹ Credible estimates of overall Palestinian death and injury rates range much higher.² At least 2,605 unarmed Palestinians were murdered while seeking aid from the Gaza Humanitarian Foundation during the summer months of 2025.³ Israel has destroyed or damaged 92% of the housing units, the majority of hospitals and health care centers, almost 90% of schools, all universities, and most of the road network across Gaza, as well as destroying and access to nearly all water and sanitation facilities.⁴

Throughout Israel's two-year assault on Gaza, Israel has deliberately limited access to basic necessities for life, which were already in short supply owing to Israel's closure and occupation of Gaza commencing in 2006. After October 7, 2023, Israel's then-Minister of Defense Yoav Gallant set the tone, declaring, "I have ordered a complete siege on the Gaza Strip. There will be no electricity, no food, no fuel, everything is closed."⁵ Since then, a plethora of Israeli government officials have uttered more than 500 incitements to genocide against Palestinians,⁶ including demands to use nuclear

1 Humanitarian Situation Update #334 | Gaza Strip | United Nations Office for the Coordination of Humanitarian Affairs - Occupied Palestinian Territory, <https://www.ochaopt.org/content/humanitarian-situation-update-334-gaza-strip>

2 The reported death toll is widely understood to be a severe undercount. See Rasha Khatib *et al.*, *Counting the Dead in Gaza: Difficult but Essential*, 404 *Lancet* 237 (2024) (letter to the editor) (doi:10.1016/S0140-6736(24)01169-3), [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) (projects possibly 186,000 deaths as of July 2024).

3 *Id.*

4 Oxfam International, *Water War Crimes: How Israel has weaponised water in its military campaign in Gaza*, (July 2024), <https://oxfamilibrary.openrepository.com/bitstream/handle/10546/621609/bp-water-war-crimes-180724-en.pdf;jsessionid=F0106B24E8CFAC29E814175755B16629?sequence=1> (Since October 7, 2023, Gazans have had only 4.74 litres of water per person per day for all uses, a 94% reduction in the amount of water available before and well below the internationally accepted minimum standard of 15 litres of water per person per day for basic survival in emergencies. By 26 May 2024, water production from sources within the whole Gaza Strip had reduced by 84% due to destruction of water infrastructure and restrictions on fuel, electricity, and water and sanitation spare parts entering Gaza. By 3 June 2024, five water and sanitation infrastructures had been taken out of service every three days (1% per three days) by the bombardment. By 3 June 2024, Gaza City had lost nearly all its water production capacity, with 88% of its water wells, 100% of its brackish water desalination plants and 100% of its seawater desalination plants damaged or destroyed and put out of service. The Israeli military has destroyed the two main water quality testing laboratories. By 3 June 2024, the Israeli military had destroyed 100% of all water and sanitation warehouses in Gaza City and Khan Younis. By 3 June 2024, the Israeli military had destroyed 70% of all sewage pumps and by 26 June 2024, 100% of all wastewater treatment plants in Gaza.)

5 *Defense minister announces 'complete siege' of Gaza: No power, food or fuel*, *Times of Israel*, (October 9, 2023) https://www.timesofisrael.com/liveblog_entry/defense-minister-announces-complete-siege-of-gaza-no-power-food-or-fuel/

6 <https://law4palestine.org/law-for-palestine-releases-database-with-500-instances-of-israeli-incitement-to-genocide-continuously-updated/>

weapons on the Palestinians.⁷

The Israel Defense Force has determined that 83% of the Gazan casualties are civilians, an unusually high rate since Israel has waged the genocide with advanced technological surveillance and stupendous artificial intelligence methodologies.⁸ The high proportion of civilian deaths bolsters the perception that civilian deaths have been a priority military objective, and not merely a collateral effect of combat.⁹

From these grisly statistics, it's no wonder that there are dozens of authoritative findings and rulings that an active genocide is being conducted in Gaza while ethnic cleansing proceeds apace in the West Bank.¹⁰

7 *Commentary: Nuclear weapons, Israel, and Gaza*,

https://www.icanw.org/commentary_nuclearweapons_israel_gaza

8 *Israeli army database suggests at least 83% of Gaza dead were civilians*, <https://www.972mag.com/israeli-intelligence-database-83-percent-civilians-militants>

9 *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel - Britain Palestine Project* (June 25, 2025)

<https://britainpalestineproject.org/report-of-the-independent-international-commission-of-inquiry-on-the-occupied-palestinian-territory-including-east-jerusalem-and-israel/> (Israeli security forces directed air strikes

against scores of educational facilities, with no or inadequate advance warning, despite the presence of civilians inside some of the facilities at the time of attacks. . . many resulted in disproportionate harm to civilians. . . the Commission finds that Israeli security forces committed the war crimes of: (a) directing attacks against civilians; (b) willful killing (where civilians were killed due to the attacks); and (c) intentionally launching an attack in the knowledge that such attack would cause incidental loss of life or injury to civilians which would be clearly excessive in relation to the concrete and direct overall military advantage anticipated. Furthermore, the Commission finds that, in killing civilians sheltering in schools, Israeli security forces committed the crime against humanity of extermination.)

10 13 October 2023, Raz Segal, <https://jewishcurrents.org/a-textbook-case-of-genocide...>; 15 October 2023: *Public Statement: Over 800 Scholars Warn of Potential Genocide in Gaza*

<https://twailr.com/public-statement-scholars-warn-of-potential-genocide-in-gaza/...>; 2 November: *UN experts call to prevent genocide*: <https://un.org/unispal/document/gaza-is-running-out-of-time-un-experts-warn-demanding-a-ceasefire-to-prevent-genocide/...>; 16 November: *UN experts call to prevent genocide*:

<https://ohchr.org/en/press-releases/2023/11/gaza-un-experts-call-international-community-prevent-genocide-against...>; 16 November, William Schabas: https://ccrjustice.org/sites/default/files/attach/2023/11/Declaration%20Expert%20William%20Schabas_w.pdf...; 16 November: *Holocaust and genocide scholars John Cox, Victoria Sanford, and Barry Trachtenberg declaration*, https://ccrjustice.org/sites/default/files/attach/2023/11/Historians%20Declaration_w.pdf...; 29 December, *South Africa submission to ICJ*: <https://icj-cij.org/sites/default/files/case-related/192/192-20231228-app-01-00-en.pdf...>; 29

May, *South Africa's dossier of evidence of Israel's genocidal intent*, the UN Security Council: <https://tinyurl.com/nb6ua4a5>; Martin Shaw, <https://x.com/martinshawx/status/1820389008880361676...>; UN Expert Francesca Albanese, *first report on the Genocide* (March 2024): <https://ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session55/advance-versions/a-hrc-55-73-auv.pdf...> UN Expert Francesca Albanese, *second report on the Genocide* (October 2024): <https://documents.un.org/doc/undoc/gen/n24/279/68/pdf/n2427968.pdf...>; John Quigley, “*Legal Standard for Genocide Intent: An Uphill Climb for Israel in Gaza Suit*”, 14 March 2024, EJIL: <https://ejiltalk.org/legal-standard-for-genocide-intent-an-uphill-climb-for-israel-in-gaza-suit/...>; UK Judges’ and Lawyers’ Open Letter Concerning Gaza, 3 April 2024: <https://lawyersletter.uk>; Jinan Bastaki, “*Gaza, Forced Displacement, and Genocide*”, EJIL, April 2024, <https://ejiltalk.org/gaza-forced-displacement-and-genocide/...> Nimer Sultany, “*A Threshold Crossed: On Genocidal Intent and the Duty to Prevent Genocide*”

II. Ohio's Current Investments Of Israel Bonds Exemplify Moral And Legal Hazards Of Investment in Israel

Consider the Ohio Treasurer's official investments of at least \$262,500,000 in Israel Bonds.¹¹ Israel's government uses sales proceeds from Israel Bonds to perpetrate the commission of mass murder via purchases of weapons of war and conduct of the ongoing genocide in the Gaza strip via bullets and bombs and famine.¹² Bond proceeds also pay for the development and operation of illegal Israeli settlements in the West Bank of Palestine.¹³ The Development Corporation for Israel promotes bond sales in the U.S. to finance Israel's illegal war against Iran.^{14 15} Israel Bonds finance seizures of land from Palestinian owners without cause, compensation or due process, and home demolitions in the

in Palestine", May 2024: <https://tandfonline.com/doi/full/10.1080/14623528.2024.2351261...>; University Network for Human Rights report, May 2024: <https://humanrightsnetwork.org/publications/genocide-in-gaza...>; Aryeh Neier, NYRB, 6 June 2024: <https://nybooks.com/articles/2024/06/06/is-israel-committing-genocide-aryeh-neier/?srsltid=AfmBOopOf1xbf1Ucx3Bvo11nN7VEEL-J7IA6jCNd9mhgWGeSUcLgQ9Y7...>; UN Commission of Inquiry, 10 June: Detailed findings on the military operations and attacks carried out in the Occupied Palestinian Territory from 7 October to 31 December 2023: <https://ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session56/a-hrc-56-crp-4.pdf...>; Oxfam, Water War Crimes report, July 2024: <https://oxfam.org/en/press-releases/israel-using-water-weapon-war-gaza-supply-plummets-94-creating-deadly-health...>; Omer Bartov, 13 August 2024: <https://theguardian.com/world/article/2024/aug/13/israel-gaza-historian-omer-bartov...>; Haaretz, "The Numbers Show: Gaza War Is One of the Bloodiest in the 21st Century", 14 August 2024: <https://haaretz.com/middle-east-news/palestinians/2024-08-14/ty-article-magazine/.premium/the-death-toll-in-gaza-is-bad-even-compared-to-the-wars-in-ukraine-iraq-and-myanmar/0000191-50c6-d6a2-a7dd-d1decf340000...>; Maryam Jamshidi, On Genocidal Intent, August 2024: <https://opiniojuris.org/2024/08/02/reflecting-on-genocidal-intent-in-the-icj-case/...> *Forensic Architecture: cartographic analysis of the genocide in support of South Africa's case in the ICJ*: <https://forensic-architecture.org/investigation/a-cartography-of-genocide...>; AOAV analysis that shows vast majority of killed in Gaza are civilians: <https://aoav.org.uk/2024/casualties-in-gaza-israels-claims-of-50-combatant-deaths-dont-add-up-at-least-74-of-the-dead-are-civilians/>; 10 October 2024: UN Commission of Inquiry: Israel's destruction of the health system in Gaza, <https://ohchr.org/en/press-releases/2024/10/un-commission-finds-war-crimes-and-crimes-against-humanity-israeli-attacks...>; 8 November 2024: UN Commission of Inquiry: 70 percent of verified victims (October - 30 April) were children and women: <https://ohchr.org/en/documents/reports/six-month-update-report-human-rights-situation-gaza-1-november-2023-30-april-2024...>; 12 November 2024: *8 aid organizations of the systematic violation of ICJ orders on humanitarian assistance, thereby establishing genocidal intent*, <https://oxfam.org/en/press-releases/joint-release-israel-receives-failing-grade-us-demands-gaza...>; 14 November 2024: UN Special Committee Report <https://ohchr.org/en/press-releases/2024/11/un-special-committee-finds-israels-warfare-methods-gaza-consistent-genocide...>; North Gaza: 9 October 2024: 18 Aid organizations warn of dramatic escalation of humanitarian catastrophe in northern Gaza. <https://oxfam.org.uk/media/press-releases/aid-organisations-warn-of-dramatic-escalation-of-humanitarian-catastrophe-following-further-mass-forced-displacement-of-civilians-in-northern-gaza/>; 15 October 2024, 38 organizations: "Northern Gaza is being wiped off the map": <https://oxfam.org/en/press-releases/urgent-joint-statement-northern-gaza-being-erased-global-leaders-must-act-now-end...>; 1 November 2024: statement by 15 UN and humanitarian organizations: <http://bit.ly/40pLGqX>; 'You Feel Like You Are Subhuman:' Israel's Genocide Against Palestinians in Gaza, Amnesty International, 4 December 2024, <file:///C:/Users/tjlod/Downloads/MDE1586682024ENGLISH.pdf>

11 Treasurer Robert Sprague Announces \$35 Million Israel Bond Purchase,

<https://tos.ohio.gov/newsroom/article/treasurer-robert-sprague-announces-35-million-israel-bond-purchase/>

12 "Israel's Ever-Expanding War Machine Is Financed Through International Bond Sales," Truthout (July 26, 2025), <https://truthout.org/articles/israels-ever-expanding-war-machine-is-financed-through-international-bond-sales/>

West Bank ordered by the Israel government.¹⁶

But all Israeli settlements constructed outside of Israel's 1967 borders have been ruled by the International Court of Justice to be illegal acts of Israeli occupation of Palestine. In 2024 the International Court ordered all Israeli settlements in Palestine to be vacated immediately and for reparations to be paid to the victims of Israel's 58-year-long occupation.¹⁷ Israel has demonstrated zero compliance with the International Court's ruling. Investments funneled to Israel from, say, JobsOhio liquor tax revenues to promote businesses in the West Bank could generate profits that could be deemed ill-gotten gains made from stolen Palestinian lands. Profits from business activity under illegal auspices might be prosecutable as the crime of money laundering under federal or Ohio law, *see* 18 U.S.C. § 1956, 26 U.S.C. § 60501 and O.R.C. § 1315.53.

Ohio voters may legitimately question whether the HB 188 trade mechanism, with its open-ended wording, is meant to become a conduit for secretly investing, such as through JobsOhio, even more Ohio taxpayer funds in dubious economic ventures that are possibly illegal under international, federal or Ohio law.

III. HB 188 Contains No Means To Avoid Ohio Investments In Complicit Criminal Acts

HB 188 contains no terms that would screen supported economic projects to ensure there would be no direct or indirect support for Israel's war crimes, genocide and human rights violations. The world which Israel has reshaped at such a cost compels those who might associate to exercise serious

13 United Nations: Include 'Israel Bonds' in Settlement Businesses Blacklist and Corporate Crimes Report - DAWN (January 10, 2025), <https://dawnmena.org/united-nations-include-israel-bonds-in-settlement-businesses-blacklist-an-corporate-crimes-report/>

14 *Israel Bonds Supports Israel Amid Fight With Iran*, a televised interview titled, *Israel Bonds and Israel's Economic Resilience. Video*, <https://www.youtube.com/watch?v=g0zOP2vFWII&t=324s> (DCI President & CEO Dani Naveh explains how Israel Bonds support Israel amid its fight with Iran, highlights how Israel's economy continues to show resilience in the face of ongoing security threats, and emphasizes the essential role of investing in Israel Bonds); Also see, *Building Tomorrow, Together*, Israel Bonds promotional video, <https://www.youtube.com/watch?v=IFDaYSc4ksw&t=51s>

15 F. Albanese, "From economy of occupation to economy of genocide Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967," UN Special Rapporteur (July 2, 2025), <https://docs.un.org/en/A/HRC/59/23>

16 *Breaking the Bonds Between U.S. Local and State Public Funds and the Occupation of Palestine*, Internationalist Law Center (April 16, 2025), <https://www.palestinepolicy.org/news/breaking-the-bonds-between-u-s-local-and-state-public-funds-and-the-occupation-of-palestine> (proceeds from Israel Bonds are utilized to reimburse U.S. exports of weapons to Israel, which weapons are used to commit serious violations of international humanitarian law and international human rights law); also, see *United Nations: Include 'Israel Bonds' in Settlement Businesses Blacklist and Corporate Crimes Report*, Democracy for the Arab World Now (January 2025), <https://dawnmena.org/united-nations-include-israel-bonds-in-settlement-businesses-blacklist-and-corporate-crimes-report>

17 The International Court of Justice determined, among other things, that Israel's occupation of the oPt (Occupied Palestinian Territory) is unlawful and must end, and that all nations of the world are under an obligation to not recognize the legality of Israel's presence in the oPt, and to cooperate in bringing an end to Israel's violations. *See Legal Consequences Arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, Including East Jerusalem, Advisory Opinion*, 2024 I.C.J 186, paras. 88-94, 267, 274-79 (19 July 2024), <https://www.icj-cij.org/sites/default/files/case-related/186/186-20240719-adv-01-00-en.pdf>.

caution. The pitfalls of joint economic ventures within Israel require an ongoing assessment of the legal and political implications of every joint project. This is because complicity to genocide, a war crime, or ethnic cleansing might be rather easily shown; complicity does not require that the accomplice share the same intent as the perpetrator.¹⁸ “[I]t is sufficient that in providing logistical, financial or operational support, [that the accomplice] had actual or constructive knowledge that the principal perpetrators were engaged in a given crime. . . .”¹⁹

Israel’s genocide in Gaza is ongoing. At least 95 Palestinians have been killed by the Israeli military since October 10, 2025.²⁰ “The war is not yet over; we must complete our sacred mission of bringing the fallen hostages home and continue the campaign against Hamas,” IDF Chief of Staff Lt. Gen. Eyal Zamir said recently at a military conference.²¹ Only 15% of the 600 truckloads per day Israel promised to allow entry into Gaza under the current ceasefire deal are being allowed into Gaza.²² The conditions for renewed fighting and additional Israeli massacres of Palestinians remain.

Should Ohio officials be gambling Ohio taxpayer resources on dubious economic ventures with an international pariah state, given the associated open-ended security, legal and political demands? We submit that this is no time for an Ohio-Israel Partnership, and we respectfully urge that HB 188 be rejected and tabled by the Development Committee.

Sincerely,

/s/ Terry J. Lodge

Terry J. Lodge

Counsel for Northwest Ohio Peace Coalition

18 *Id.* at 181 (“[A]n accomplice to genocide need not necessarily possess the *dolus specialis* of genocide, namely the specific intent to destroy, in whole or in part, a national, ethnic, racial or religious group, as such.”).

19 F. Albanese, “*From economy of occupation to economy of genocide Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967*,” UN Special Rapporteur (July 2, 2025), <https://docs.un.org/en/A/HRC/59/23> p. 33.

20 “Israeli Drone Attack in Southern Gaza Kills Two Palestinians,” Antiwar.com <https://news.antiwar.com/2025/10/27/israeli-drone-attack-in-southern-gaza-kills-two-palestinians/>

21 IDF chief Zamir: Gaza war not over until last of the deceased hostages is returned | The Times of Israel https://www.timesofisrael.com/liveblog_entry/idf-chief-zamir-gaza-war-not-over-until-last-of-the-deceased-hostages-is-returned/

22 Only about 15 percent of promised aid trucks have entered Gaza since ceasefire: Media Office - TRT World <https://www.trtworld.com/article/08e9358c8637>