Boycott™ Watch ...So you can decide for yourself what the truth is.

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BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Dexter M. Price
Director, Office of Antiboycott Compliance
United States Department of Commerce
14th Street & Constitution Avenue, N.W.
Washington, D.C. 20230

Dear Mr. Price:

I am the Executive Director of Boycott Watch, a non-partisan organization dedicated to tracking, investigating and reporting on consumer boycotts in order to educate consumers, and where appropriate, to alert them to scams or boycott calls that are disseminating false information. Our organization thoroughly investigates and analyzes boycotts that are propagated. Then, primarily through publications including our website (www.BoycottWatch.org), we convey the facts to consumers, so that they can make informed decisions about the merits of the boycotts and avoid becoming victims of false information or participants in consumer actions that violate, or advocate violating, the law. In addition to the service we provide to consumers, Boycott Watch works with businesses that are the subjects of boycotts, to help them convey their side of the story to the public and to clear their name if the boycotts are based on false information. Part consumer watchdog, part industry advocate and part news organization, Boycott Watch is unique in providing consumers with non-biased reporting and in exposing scam or potentially illegal boycotts, among other services. Our work was acknowledged in a brief filed with the United States Supreme Court in February 2003.

Over the past 18 months, Boycott Watch has been investigating the divestment campaign against Israel that is proliferating across college campuses. Divestment is a form of boycott specifically targeted at investments, yet the campaign objectives are more far-reaching. In addition to advocating the boycott of products made in Israel, as well as the secondary boycott of companies doing business with or in Israel, the campaign extends to the boycott of Israeli academic research and personnel, a cultural boycott of events featuring the participation of Israeli artists and performers, a sports boycott of events featuring Israeli participants, and a tourism boycott against Israel. The campaign's objective is purportedly to harm Israel financially because of its policies and

practices. I say purportedly because there is more gender, religious, sexual orientation, and ethnic equality in Israel than in any other Middle Eastern or Muslim country. Yet the organized student divestment campaign projects the opposite picture about Israel – and it is because the campaign has been initiated and promoted by Israel's detractors, either from, or with origins in, Arab countries of the Middle East, or their sympathizers.

Most of the groups or organizations that promote a boycott against Israel are connected to one another. The websites of the United States-based organizations link to other divestment websites, and to websites calling for a general or larger boycott of Israel. A table of such websites is set forth in Appendix A to this letter. Divestment advocates have spread their boycott campaign activities to college campuses across the country. They have even engaged in activities to encourage local and state governmental agencies to participate in the divestment campaign. A list of municipal targets encouraged to participate in the divestment campaign is set forth in Appendix B.

Boycott Watch's research has disclosed Internet websites that act as clearinghouses for contact information between various groups; these websites are set forth in Appendix A. The divestment effort in this country is thus an organized, collaborative campaign to promote boycotting Israel; it is not random activity with groups acting individually and in isolation. This is significant because these groups are acting in the interstate commerce of the United States and refusing to do business with or in Israel, within the meaning of Section 760.2 (a) (1) of the BIS regulations.

There is substantial evidence that links this organized boycott activity to a foreign boycott against Israel, unsanctioned by our government. In its annual report for 2003, the Office of the U.S. Trade Representative surveyed significant foreign barriers to United States exports, and identified the Arab League boycott of Israel as "an impediment to U.S. trade and investment in the Middle East and North Africa." See Appendix F. According to the report, in October 2000, participants in the Cairo Arab Summit adopted a resolution to reactivate the Arab League boycott. During and following the Summit, Syria proposed that the boycott be reinstated and that a study be conducted to determine how best to implement it. Appendix F. As a result of these regional developments, the Central Boycott Office held an official regional meeting in Damascus in October 2001, the first such meeting since April 1993. Appendix F. Nineteen of the Arab League's 22 member states participated (only Egypt, Jordan and Mauritania were absent). Appendix F. While the October meeting reportedly did not result in the addition or removal of foreign firms from the blacklist, the legal structure of the Arab League boycott was not changed and remained in effect. Appendix F. As the federal government report noted, the boycott "remains a substantive impediment to doing business in those countries which still rigidly impose its terms." Appendix F.

Not only did the Arab League affirm and reactivate its boycott against Israel in October 2000; the Palestinian Authority declared its own boycott of Israeli products at virtually the same time. According to a Reuters report on October 7, 2000, Palestinian Industry Minister Sa'di Al-Krunz stated, "We have decided to boycott Israeli products…This is not a temporary decision, we hope it will continue...Israel will be

harmed by our decision because we import around $3 billion of goods annually from Israel." Appendix E.

As the Office of the U.S. Trade Representative has acknowledged, the Arab boycott is still going strong. In June 2002, the Foreign Ministers of the Office of the Islamic Conference (OIC) issued a resolution for the express purpose of ensuring the continuing effectiveness of the boycott against Israel. See Appendix C, Article (1). The boycott has even reached absurd and pitiful proportions: In June 2003, the Arab countries refused to take part in the Special Olympics because Israeli athletes were participating. See Appendix C, Article (2). The hostility of the Arab countries toward Israel obviously outweighed their desire to permit their own mentally retarded citizens the opportunity to experience the health benefits, community and joy of this worldwide sports event.

At the same time that the Arab League recharged its boycott against Israel and the Palestinian Authority declared a boycott, an individual in the United States was instrumental in creating and organizing the divestment campaign against Israel in this country: His name is Francis A. Boyle and not surprisingly, he has admittedly strong ties to the Arabs and the Palestinians, and has played – by his own account -- a critical advisory role to them in order to achieve their political goals concerning Israel.

Professor Boyle teaches international law at the University of Illinois, Champaign. On November 30, 2000 -- less than two months after the Arab League affirmed and the Palestinian Authority declared a boycott of Israeli products-- Boyle gave a public lecture at Illinois State University, in which he "issued a call for the establishment of a nationwide campaign of divestment/disinvestment against Israel, which [he] later put on the internet." See Appendix D, Parts 1 and 2. According to Professor Boyle, it was in response to his call for action that, first, students at the University of California at Berkeley, and then, students at the University of Illinois at Urbana-Champaign, launched their respective divestment campaigns. Even the city of Ann Arbor, Michigan considered divesting from Israel in response to Boyle's call. In a January 2002 article entitled "Law and Disorder in the Middle East," Boyle "sketch[ed] out a new direction for the Palestinian people and their supporters around the world to consider as an alternative to the Oslo process." Appendix D, Part 1. Among other things, he called for the following: "Concerned citizens and governments all over the world must organize a comprehensive campaign of economic disinvestment and divestment from Israel . . . . [A] worldwide disinvestment/divestment campaign against Israel will play a critical role in dismantling its criminal apartheid regime against the Palestinian people living in occupied Palestine as well as in Israel itself." Appendix D, Part 1. By Professor Boyle's own account, it was he who prompted "over 30 campuses in the United States . . . [to] organize[] divestment/disinvestment campaigns against Israel." Appendix D, Part 2. Indeed, many of the organized student divestment websites quote Professor Boyle and echo his call for an international boycott campaign against Israel.

Boyle is not simply a law professor who is supporting and fostering a boycott

against Israel to further his own personal political beliefs. Rather, he is an admitted instrument of the Palestine Liberation Organization and the Palestinians, and, by his own account, has been directly and intimately involved on their behalf in devising a negotiating strategy with Israel. From 1987 to 1989, Professor Boyle was a self-described "advisor to the Palestine Liberation Organization on Creation of the State of Palestine." Appendix D, Part 2. From 1991 to 1993, he was a "legal advisor to the Palestinian delegation to the Middle East peace negotiations." Appendix D, Part 2. And, as of at least May 2002, Professor Boyle was a "sometime legal advisor to the provisional government of the State of Palestine." Appendix D, Part 2. According to Boyle, he analyzed the Israeli proposal for peace in 1992, he was a consultant to the Palestinian delegation, and he drafted a proposed interim peace proposal for the Palestinian delegation and the PLO leadership in Tunis. Appendix D, Part 1.

Professor Boyle himself makes the connection between his role as strategist and advisor to the Palestinian Authority and the organized divestment/boycott campaign against Israel that he instituted and promoted in this country. He has freely admitted that the divestment campaign is for political purposes. Part of the Arabs' negotiating strategy, according to Boyle, is the boycott campaign -- to "provide the Palestinians with enough economic and political leverage needed to negotiate a just and comprehensive peace settlement with the Israelis." Appendix D, Part 2.

Several facts thus exist: Boyle has close and longstanding ties to the Arabs and the Palestinians and has acted as negotiator for and advisor to the Palestinian Authority (which is a member of the Arab League); the Arab League affirmed and the Palestinian Authority declared a boycott of Israeli goods, and almost immediately thereafter, Boyle issued his call for a nationwide divestment campaign in this country; and Boyle admits that he issued his call to further the political objectives of the Arabs and the Palestinians. It is plain that the response he engendered and encouraged – a collaborative, organized boycott campaign against Israel – is in furtherance of a foreign boycott. This conduct – intended to comply with, further and support an unsanctioned foreign boycott against Israel -- constitutes a blatant violation of the antiboycott provisions of the Export Administration Act. Additionally, the effort to further and support a foreign boycott in this country is an insult to and a violation of our sovereignty by foreign governments that seek to absorb our nation into their economic warfare."

We urge you to put a stop to this illegal conduct in order to prevent United States citizens from subverting our government's foreign policy by helping to implement the Arab League and Palestinian Authority's economic boycott of Israel. American citizens should not be permitted to participate in an international boycott that the United States does not sanction, and that our government has determined to be a substantial impediment to trade and investment.

Sincerely,

Fred Taub
Executive Director, Boycott Watch

APPENDIX A

Appendix A
Table of Israel Divestment Boycott Web Sites (representative sample)

Significantly, the web sites of the organized Israel divestment boycott campaign predominantly link to general boycott-Israel web sites. The overall objective of the campaign is thus the general boycott of Israel, Israeli products and services, with the goal to harm Israel financially. This is the same objective of the Arab boycott of Israel to which the organized Israel divestment boycott campaign in this country is linked.

Legend:
CO: Country of Origin
DIVLink: Links to other divestment web sites
Blinks: Links to websites calling for a general or larger boycott of Israel and Israeli goods
ISP: Location of the web site hosting

URL/ Name	CO	DIVLink	BLinks	ISP
www.columbiadivest.org Columbia University Divestment Campaign	US	Yes	Yes	US
www.divestment.org/ Divest from Israel (UC Berkeley)	US	Yes	Yes	US
www.divest-from-israel-campaign.org (Clearinghouse site)	US	Yes	Yes	US
www.divest-from-israel-campaign.org/ Campaigns/St_Lawrence_Divest.html	US	Yes	Yes	US
www.divest-from-israel-campaign.org /Yale/DivestfromIsraelPetition.html	US	Yes	Yes	US
www.dukedivest.org/ Not Currently Active	-	-	-	-
www.gatorsfordivestment.org/	US	Yes	Yes	US
www.geocities.com/penndivest University of Pennsylvania divestment	US	Yes	Yes	US
www.harvardmitdivest.org HarvardMITdivest.org	US	Yes	No	US
www.inform.umd.edu/studentorg/sjp/	US	Yes	Yes	US
www.israel-divest.org/ Divest from Israel (Clearinghouse site)	US	Yes	Yes	US
www.israel-divest.org/Tufts Tufts Israel divestiture campaign	US	Yes	Yes	US
www.ncdivest.org/ UNC divestment petition	US	Yes	No	US

www.njsolidarity.org/ New Jersey Solidarity - Activists for the Liberation of Palestine	US	Yes	Yes	US
www.oberlin.edu/stuorg/sfp/ Oberlin (Ohio) College – Students for a Free Palestine	US	Yes	Yes	US
www.osudivest.org/	US	Yes	Yes	US
www.princetondivest.org Princeton Divest	US	No	No	US
www.rutgersdivest.org/	US	Yes	Yes	US
www.sjpumd.org/ University of Maryland	US	Yes	Yes	US
www.sjp-mn.org/ Students for Justice in Palestine – Minnesota	US	Yes	Yes	US
www.smjwayne.org/ Students Movement for Justice Wayne State University (MI)	US	Yes	Yes	US
www.studentorg.vcu.edu/fpn/ Free Palestine Now	US	Yes	Yes	US
www.ucdivest.org University of California Divestment Petition Website	US	Yes	Yes	US
www.uofidivest.org/ University of Illinois Divestment Campaign	US	Yes	Yes	US
www.yaledivestmentnews.org Yale Divestment News	US	Yes	Yes	US
Total Active Web Sites:	24	23	21	24

Sample of Significant Web sites Advocating the Boycott of Israel

There are hundreds, if not thousands, of web sites advocating the boycott of Israel. The following list is a representative sample of the web sites we found.

Legend:
CO: Country of Origin

URL/ Name and notes	CO
www.inminds.com & www.inminds.co.uk Innovative Minds - An Islamic web site based in the UK that advocates primary and secondary boycotts of Israel, divestment, and an academic, cultural, sports and tourism boycott. This site also offers a video game for sale that advocates violence against Israel.	UK with a US tie-in
Boycottisraeligoods.org Boycott Israeli Goods Clearinghouse website for divestment and a general boycott of Israel with links to the "Palestine Solidarity Campaign" thus indicating the connection between the US boycott of Israel and support for the Arab boycott of Israel.	US
sustaincampaign.org Stop US Tax-funded Aid to Israel Now Organization claims to have been started in October 2000 at the request of Palestinians in El Bireh thus constituting a foreign request.	US
http://al-awda.org/ Site calls for the total dismantling of Israel and replacing it with a Palestinian state.	US
http://www.geocities.com/campaign002 Boycott Israeli Goods Now - Site calls for a boycott of Israeli goods and a secondary boycott of US companies that do business with/in Israel.	US

APPENDIX B

A Sample of Municipal Divestment Campaigns Found on Campus Web Sites:

The following municipalities have considered or passed resolutions to participate in the divestment boycott campaign. This is further evidence that the goal of the organized Israel divestment boycott campaign is a total boycott of Israel that goes beyond the original campus divestment campaign.

The campaign is also consistent with the objective of the Arab boycott of Israel.

Legend:
CO: Country of Origin
ISP: Location of the web site hosting

URL/Name	CO	ISP
http://www.divest-from-israelcampaign.org/CitySeattle.html and members.aol.com/edwardmast/divest.html City of Seattle Divestment	US	US
As describe by Boyle – Appendix D City of Ann Arbor, Michigan per Boyle	US	N/A
Berkeley, CA (Included a request to Congress http://www.ci.berkeley.ca.us/commissions/peaceandjustice/2002peaceandjustice/minutes/040802m30.htm	US	US
http://www.texasobserver.org/showArticle.asp?ArticleID=741 Dallas, Texas	US	N/A

Appendix C

Supporting Article:

Article 1) Recent call to sustain the Arab League boycott of Israel
From: http://www.oic-oci.org/english/fm/29/29%20icfm-pol2-e.htm

RESOLUTION NO.56/29-P

ON SUSTAINING THE IMPLEMENTATION OF THE ISLAMIC BOYCOTT OF ISRAEL

The 29th Session of the Islamic Conference of Foreign Ministers (Session of Solidarity and Dialogue), held in Khartoum, Republic of the Sudan, from 14-16 Rabi Thani 1423H (25-27 June, 2002),

Proceeding from the principles and objectives of the OIC;

Recalling the Final Communique of the Extraordinary Session of the Islamic Conference of Foreign Ministers on the grave situation in the Occupied Palestinian Territories, held in Doha, State of Qatar, on the 26th of May, 2001, which calls for commitment to apply the provisions of the Islamic boycott of Israel, and considering the legislations, statutes, and rules regulating the boycott process (general principles of the boycott, Islamic law, rules of procedure and regular meetings of regional offices) as an integral part of the national legislation in force, and setting up the necessary offices and mechanisms for such implementation;

In implementation of Islamic resolutions calling for increased cooperation and coordination between the Arab and the Islamic boycott offices;

In response to the call made by the 68th Conference of the Liaison Officers of the Regional Arab Offices for the Boycott of Israel, held in Damascus, Syrian Arab Republic, on 28-30 April, 2002, to the Islamic Boycott Office of the OIC General Secretariat, to hold a Conference of Specialists to study the ways and means to activate the Islamic boycott of Israel;

Decides to:

1. **Commission** the OIC Islamic Office for the Boycott of Israel to call for a Conference of Islamic Boycott Experts and Specialists to study the ways and means to revive and activate the boycott of Israel.

2. **Call on** OIC Member States to pledge to attend the Conference of Islamic Liaison Officers for the Boycott of Israel called for by the Islamic Office for the Boycott of Israel.

3. **Commission** the Secretary General to follow up the implementation of this resolution.

Article 2) Arab Boycott of Israel extends to the Special Olympics
From Israel National News:
http://www.israelnationalnews.com/news.php3?id=45529

Arab Boycott of Israel At Special Olympics

07:52 Jun. 24, '03 / 24 Sivan 5763

(IsraelNN.com) While some Israeli leaders continue to speak of the new Middle East, and living in peace with our neighbors, Israeli athletes at the Special Olympics in Ireland are getting a taste of the true feeling of our Arab neighbors towards Israel. Saudi Arabia's soccer team decided to boycott a match against Israel as the Arab countries participating in the sporting event are refusing to play against Israel.

Appendix D

Articles by Francis A. Boyle, claimant as the originator of the Israel divestment boycott campaign.

Article 1:
Law and Disorder in the Middle East
An article by Francis A. Boyle
Americans for Middle East Understanding
http://www.AMEU.org
January 2002
(17 pages)

Appendix D

Articles by Francis A. Boyle, claimant as the originator of the Israel divestment boycott campaign.

Article 2:
In Defense of a Divestment Campaign Against Israel
An article by Francis Boyle
Counterpunch Magazine
http://www.counterpunch.org
May 20, 2002
(11 pages)

Appendix E

Reuters article regarding the Palestinian Authority declaration of a boycott of Israeli goods.

Saturday, October 7, 2000

Palestinians to boycott Israeli goods.

October 07, 2000 - Reuters

The Palestinian Authority on Saturday announced a boycott of Israeli goods to protest against the killing of Palestinians by Israeli forces in 10 days of clashes.

Industry Minister Sa'di Al-Krunz said his ministry had asked Palestinian factories to work 24 hours and at full capacity to cover the needs of the Palestinian market. Palestinian factories were also being asked to sell their goods at cost.

"We have decided to boycott Israeli products that have Palestinian replacements, but we hope our people will boycott all Israeli products in protest against the massacre of our people by the Israeli army," Krunz told Reuters.

"This is not a temporary decision, we hope it will continue...Israel will be harmed by our decision because we import around $3 billion of goods annually from Israel."

Israel has sealed off Palestinian areas to both goods and people during the September-October clashes.

Officials say the Palestinian economy, which has depended on Israel since the 1967 occupation of the West Bank and Gaza, has started to import directly from elsewhere.

"We now import around 90 percent of our raw materials for our industries from international markets and not from Israel," Krunz said.

He said Palestinian consumers would not be affected by the boycott because Palestinian industries already covered 50 percent of the Palestinians' needs, and if they worked 24 hours, they could meet the entire shortfall.

Appendix F

2003 National Trade Estimate report on Foreign Trade Barriers – Arab League Boycott of Israel