

LLG Law

**The District Commissioner of the Capital Region**  
**Skógarhlíð 6, Districts**  
**150 Reykjavík, Iceland**  
**Postal Code: .-**

Reykjavík, April 26, 2023

## REQUEST FOR INJUNCTION

**Petitioner:** Anti Defamation-League, with legal address at 605 Third Avenue, New York, NY 10158-3560, United States. /006 2743860

**Respondent:** 1984 ehf., ID no. 500306-2110, with legal address at Fálkagata 8, 107 Reykjavík, Iceland.

The representative of the petitioner is Daði Áslaugarson, Chairman of the Board, ID no. 210173-5789, residing at Bragagata 30, 101 Reykjavík, Iceland.

Ólafur Örn Svansson, attorney at Forum Lawyers, Ármúla 13, 108 Reykjavík, olafur@forum.is, has represented the interests of the respondent in communication with the petitioner's attorney.

### Claim Form

The petitioner demands that the District Commissioner of the capital area imposes a ban on hosting the website <https://mapliberation.org>, whether or not www. is in front of the website name, as well as data, content, and information displayed on the website.

Furthermore, it is demanded that the District Commissioner of the capital area imposes a ban on the respondent allowing access to the website <https://mapliberation.org>, whether or not www. is in front of the website name, and does not distribute data, content, and information displayed on the website.

It is required that the aforementioned ban be imposed without the petitioner being required to provide any guarantees.

### Reasons for the case and other circumstances:

1. The petitioner is a free and non-profit organization that was founded in 1913. Their headquarters are in the United States.
2. The purpose of the organization has been from the beginning to fight against anti-Semitism and ensure justice and fair treatment for all. Today, the organization has declared a policy of combating anti-Semitism and all forms of racism and hate speech wherever it appears.

3. The organization operates offices in 25 locations across the United States. Representatives of the organization respond to anti-Semitism and hate speech, promote their policy positions to elected officials, and offer education in schools and workplaces in line with their stated purpose.
4. Respondent is a specialized web hosting company
5. According to information provided by the respondent themselves, the respondent is a company that specializes in web hosting for businesses and individuals worldwide. Thousands of websites are hosted by the respondent.
6. On the respondent website, it is stated that web hosting with them is the most popular in Iceland.
7. Transactions with the respondent are based on the service terms and conditions displayed on the respondent's website.
8. In them, it is stated, among other things, that the hosting offered by the respondent is a so-called shared hosting service, which means that multiple subscribers share hardware and/or virtual hardware.
9. The service terms and conditions also state that the respondent reserves the right to temporarily or permanently suspend the subscriber's use of the service if the respondent deems that the subscriber is violating laws or ethical standards that the respondent considers reasonable to demand compliance with from subscribers at all times.
10. Furthermore, the service terms and conditions prohibit the subscriber from offering, selling, or linking to other websites that offer, sell, or display illegal, harmful, or morally objectionable content or information, as determined by the respondent.
11. Additionally, the service terms and conditions recommend that the respondent's customers waive all claims against the respondent for any potential damages that may arise from the aforementioned prohibition or suspension of the service.
12. Otherwise, the service terms and conditions specify a very limited liability on the part of the respondent for the services provided. The liability limitation in the terms and conditions applies regardless of whether the respondent or its employees are at fault.
13. According to the respondent's website, customers can expect to pay between ISK 234 and ISK 780 in monthly subscription fees, depending on the service they choose.
14. One of the websites hosted by the respondent is the website <https://mapliberation.org>.
15. It is not clear which individuals, organizations, or entities are behind the website, but it is evident that the creators of the website are highly critical of the Jewish people and their communities, whether they are located in Israel or elsewhere.
16. The content of the website clearly exhibits signs of hate speech and anti-Semitic attitudes.

17. The purpose of the website is explained on its front page, and the content is in line with that purpose.
18. The hate speech that appears on the website is directed towards individuals, businesses, and institutions associated with the Jewish community in Boston, Massachusetts in the United States and its surrounding areas.
19. The front page of the website clearly calls for action to be taken against institutions, businesses, and individuals that the website's creators claim are associated with the Jewish community in Boston and its surrounding areas, in a manner that they would be dismantled or their operations disrupted.
20. The rhetoric specifically targets institutions that belong to or are in some way associated with the Jewish community in the region, such as high schools, service centers for the disabled, student organizations, religious community centers, media outlets, charities, and even art centers.
21. The hate speech is not only directed against institutions that are in some way connected to Jewish communities, but also against private businesses, politicians, police stations, financial companies, universities, and healthcare companies.
22. So far, the website has published the addresses of individuals, businesses, and institutions, as well as the names of defenders and other personal information.
23. On the website, there are maps with dots and lines connecting specific individuals, businesses, and institutions, and comparing them to various unrelated crimes that the website's supporters claim Jewish people are responsible for, as well as opinions expressed on the website.
24. In other words, the content of the website, the information presented there, and the way in which they are presented contain an incitement and/or appeal for actions against Jews. However, such a path is taken on the website regarding the presentation of the content and messages to those readers who take that incitement or appeal to them. It is up to them to decide for themselves what actions such measures should entail. This is done, for example, in the following way:

*"We have displayed real addresses, names of representatives and leaders, and mapped connections. These organizations really exist and can be disrupted. We hope people use our map to see how they can effectively take action."*
25. It hardly needs to be said that the content of the website has caused significant concerns for the respondent and others named on the website.
26. The concerns are actually shared by the Jewish community in the Boston area, who view the content of the website as a serious threat to themselves and their safety.
27. The content of the website ultimately leads to the purpose of encouraging action against those who belong to the Jewish community in Boston and its surrounding areas, which should not be interpreted in any other way than as threats or incitements to actionable misconduct against the respondent and others identified or referred to on the website.

28. In this regard, the petitioner points out that the opening of the website <https://mapliberation.org/> coincided with a significant increase in hate crimes against the general public in the United States, whether in schools, shopping centers, prayer houses, or other public and crowded places, while Jewish communities and other minority groups have been particularly vulnerable to such attacks.
29. In that context, it should be mentioned that the perpetrators who carried out shooting attacks at the Tree of Life synagogue in Pittsburgh, Pennsylvania in the United States in October 2018 and at the black community in the Tops supermarket in Buffalo, New York in May 2022 were motivated by anti-Semitism.
30. The petitioner argues that the purpose of the website is to promote violent behavior such as that which occurred there.
31. In any case, the content of the website does not indicate any other purpose.
32. As previously stated, the petitioner relies on the fact that the content of the website <https://mapliberation.org/> exhibits obvious characteristics of hate speech and anti-Semitic rhetoric.
33. The term "*hate speech*" is not defined in formal international or national legal frameworks.
34. From legal provisions and various international legal documents, some sort of definitions or descriptions of the term hate speech and its substantive content can be found.
35. The petitioner refers to Article 233 of the Icelandic General Penal Code No. 19/1940, which is the provision of the Penal Code attributed to hate speech, and which provides for punishment for insulting, belittling, or threatening a person or group of people through expressions or other forms of communication, such as pictures or symbols, based on national or ethnic origin, color, race, religion, disability, gender identity, sexual orientation or gender expression. The provision also provides for punishment for spreading such speech and violations of the provision can result in fines or imprisonment of up to 2 years.
36. From the enforcement of judgments, it follows that individual statements that fall under the provision are considered sufficient for the provision to apply.
37. International legal doctrine also provides indications of what constitutes the main elements of the term in the international context and according to Icelandic law.
38. In that regard, the second paragraph of Article 20 of the International Covenant on Civil and Political Rights of 16 December 1966 prohibits hate speech based on nationality, race, or religion, as well as expressions that incite discrimination, hostility, or violence.
39. In paragraph 4 of the United Nations International Convention on the Elimination of All Forms of Racial Discrimination, adopted on December 21, 1965, reference is made to propaganda that is based on ideas or theories of racial superiority, or that promotes or justifies racial hatred and discrimination in any form, targeting specific races, color, or national or ethnic origins.

40. The declaration of the Council of Europe's Committee of Ministers from 1997 refers to expressions that disseminate, incite, support, or justify racial hatred, hatred against foreigners, anti-Semitism, or any other form of hatred based on intolerance, including manifestations of extreme nationalism, discrimination, and hostility against minority groups, migrants, and people of foreign origin.
41. Furthermore, the petitioner refers to the Council of Europe's Convention on Cybercrime from November 23, 2001, and the additional protocol to the convention from January 28, 2003. The additional protocol refers to the presentation of ideas and theories that advocate, support, or incite hatred, discrimination, or violence directed against any individual or group based on their race, color, descent, national or ethnic origin, or religious beliefs.
42. Provisions of the Media Act No. 38/2011 also contain important principles in this field of law. According to Article 27 of the Act, it is prohibited to intentionally incite hatred based on race, sex, sexual orientation, religion, nationality, cultural, economic, social, or other status.
43. In the explanations provided in the legislation, the term is defined as speech, text, expression, behavior, and/or conduct manifested in text, sound, and/or image that encourages violence, prejudice, and/or discriminatory behavior against an individual or group, and/or by demeaning, ridiculing, intimidating, and/or threatening the concerned individual or group.
44. With reference to the aforementioned description, the main characteristics of expression considered to be hate speech are believed to include:
  - Prejudiced expression, which is based on ignorance or indifference to facts and is unsupported by reasoning, disregarding opposing viewpoints.
  - Expression that expresses hatred towards the targeted individual or the subject of the speech, such as malice, animosity, disdain, hostility, resentment, or other similar human emotions that can be seen as manifestations of hatred.
  - Expression that specifically targets individuals or groups based on their particular attributes or status.
  - Expression that is public in nature.
45. For further clarification, the term hate speech has been broadly divided into four different stages, based on the concept known as "*The Hate Speech Pyramid*." In brief, these stages are as follows:
  - **The highest stage** of hate speech involves incitement to genocide or other similarly serious crimes against humanity (*jus cogens*) against individuals or groups, or support for such crimes or solidarity with them.
  - **At the second stage**, there is discourse that involves prejudiced and hate-filled expressions that are both threatening and express solidarity with, or support for, and deliberately incite actions that involve unlawful and harmful discrimination or even

violence against individuals or groups based on their characteristics, such as race or color. Dr. Davíð Þór Björgvinsson, a professor and a Supreme Court Justice, considers the key element in this stage to be the incitement to wrongful acts against specific groups.

- **At the third stage**, we are dealing with discourse that, in a prejudiced manner, expresses hatred, animosity, or hostility towards individuals or groups based on their characteristics. However, it is considered justifiable to limit such expressions due to the protection of human dignity or their rights, national security and public order, or general ethical considerations, or based on equality principles in certain circumstances. Under this stage, comments that are not deemed to involve support, solidarity, or incitement to engage in harmful and unlawful actions, including discrimination, against the individuals or groups, even if the expression is otherwise supportive, mocking, derogatory, or offensive to them, fall within this category.
- **At the fourth and lowest stage**, we have discourse that is not illegitimate in a legal sense but is nevertheless morally or politically objectionable as it reflects a prejudiced lack of tolerance and respect for the rights and values of others. It may be mocking, derogatory, or offensive to the individuals or groups it is directed towards. The expression is therefore not sufficiently severe or serious, considering the context, to justify imposing restrictions on it through the application of penalties, in accordance with the fundamental principle of freedom of expression.

46. It has been argued that the discourse falling within the top three levels of the hate speech pyramid is sufficiently serious to fall under Article 233(a) of the General Penal Code.
47. With reference to the aforementioned discussion, the contractor considers it proven that the content of the website <https://mapliberation.org/> qualifies as hate speech in the aforementioned sense, as it openly expresses antisemitism at best, along with prejudice and animosity towards Jews.
48. Based on the assumption that the statements and content displayed on the website fall at least within the second level of hate speech according to the aforementioned analysis,
49. The petitioner has sought assistance from authorities both in the United States and Iceland in order to have the website shut down in light of the nature of the content described earlier.
50. Thus far, these attempts have not yielded any results.
51. In those communications, it has actually emerged that the Icelandic police consider themselves to require a court ruling in order to deem it permissible to take action against the company responsible for hosting the website, namely the respondent.
52. With a formal challenge issued on March 3rd, the petitioner urged the respondent, who is responsible for hosting the website, to shut it down, remove the content displayed on it, and/or restrict access to it.
53. Despite that challenge, the respondent, as stated in the email from their lawyer dated March 10th, has not complied.

54. Therefore, the petitioner feels compelled to file this injunction request.
55. The petitioner relies on the fact that all the conditions stipulated in Article 1, Paragraph 1 of Act No. 31/1990 on injunctions, restraining orders, etc. (hereinafter referred to as the KSL) must be fulfilled in order to impose an injunction on the conduct of the respondent.
56. From the nature of the petitioner's claim, it can be seen that his request for an injunction is directed towards the hosting of the website <https://mapliberation.org/>, the dissemination of its content, and public access to the site.
57. It is undisputed that the respondent is hosting the aforementioned website.
58. Since the respondent is an Icelandic legal entity and the website is hosted in Iceland, the jurisdiction in this matter lies within the legal system of Iceland. This applies even if the content of the website is directed at individuals, institutions, and businesses outside the scope of Icelandic jurisdiction, such as in the United States.
59. The petitioner, is one of the individuals specifically named on the website, along with all 25 directors in the petitioner's government, as well as numerous individuals working for the petitioner in New England County in the United States.
60. The website contains highly derogatory, false, and defamatory statements about the petitioner. It includes allegations that the petitioner has engaged in espionage activities, including specific incidents, and further claims that the petitioner has supported violence and even provided shelter to Nazis.
61. The petitioner argues that the purpose of this discussion is to fuel hatred or animosity towards him and to incite readers of the website to take action, including acts of violence, against him, individuals associated with or working for the petitioner, or the Jewish community in Boston and its surroundings, as well as the individuals, institutions, and companies named on the website and connected in the manner depicted.
62. When it is evident that the petitioner's interests are legally protected by his claim in this matter, within the understanding of Article 24 of the KSL and according to the fundamental principles of due process, the website, its hosting, and the dissemination of its content clearly violate his protected rights, as defined in Article 71 of the Constitution Act No. 33/1944 and Article 8 of the European Convention on Human Rights, as provided for in Act No. 62/1994.
63. In addition, the content of the website is considered hate speech and antisemitism within the aforementioned understanding. Such content and its dissemination are in direct violation of Article 233(a) of the General Penal Code No. 19/1940 and are subject to punishment as provided therein.
64. The petitioner points out that Icelandic courts have ruled in their judgments that access to websites may be restricted when their content or activities violate human rights. Reference can be made to the Supreme Court judgments in cases No. 214/2009, 25/2017, and 33/2017.
65. Violations of the petitioner's interests and rights have been ongoing for some time. It is foreseeable that the offenses will continue unless action is taken. The misconduct began when

the affiliates of the website entered into an agreement with the petitioner regarding its hosting, and subsequently, the website became operational, likely in June 2022. The respondent continues to host the website, thereby contributing to providing readers with access to the content displayed. This constitutes an ongoing act as described in Article 1, Paragraph 1, of the Act on Restraining Orders. It is of no consequence that the hosting has been in effect for a significant period. Its existence is not a one-time occurrence but rather an enduring situation that requires intervention.

66. The petitioner argues that they have already suffered damage due to the respondent's hosting of a website that infringes upon their legal rights, as described above. Furthermore, the hosting of the website may lead to further harm to the petitioner and others identified therein in the future, in light of the nature, incitement, and challenges presented on the website. It is not apparent that the respondent will alter their behavior unchanged. It is impossible to foresee the extent of the potential harm that may arise from continued unrestricted access to the website, as stated in Article 1, Paragraph 1, of the Act on Restraining Orders.
67. The petitioner argues that their damage and violation of their interests cannot be adequately compensated under the rules of tort law or regulations on sanctions.
68. It is unknown who the affiliates of the website are. It is also unclear the extent of the damage that may have occurred or may occur due to unrestricted access to the website, as stated in Article 2, Paragraph 1, Subparagraph 2, of the Act on Restraining Orders. No information is available regarding the eligibility or capacity of the website's affiliates to compensate the respondent for the damage suffered or that may result from its operation and the content therein, as their identities are unknown. Furthermore, the respondent has absolved themselves of all responsibility for the content they host, as stipulated in the aforementioned terms of service.
69. The Petitioner relies on the argument that their interests in achieving the desired outcome are significantly greater than the Respondent's interests in continuing to host the website and ensuring unrestricted access to the content, as stated in Article 2, Paragraph 3, Subparagraph 2, of the Act on Restraining Orders. Hosting the website only serves to provide the affiliates with necessary means to infringe upon the Petitioner's legal rights, rather than engaging in other activities. It should be noted that the content of the website is limited in its capacity to facilitate unlawful actions and encourage their application, solely catering to the audience's unauthorized activities and prompting their application.
70. Therefore, it is necessary to duly respect the interests that the respondent may have in continuing to host the website, considering the purpose of keeping it free from unlawful content, as mentioned earlier.
71. Finally, the petitioner relies on the provision of Act No. 20/2002 on Electronic Commerce and Other Electronic Services, regarding limitations of liability for service providers such as the respondent, which does not in any way preclude the possibility of seeking a legal prohibition on the hosting of the website.
72. On the contrary, it is explicitly stated in the comments accompanying the draft legislation, as stated in Chapter V of the comments, that the provisions therein do not affect the legal remedies available to parties, and it states the following:



*"The provisions of this chapter relate to the liability of a service provider, who acts as an intermediary in the transmission, storage, or hosting of data. The draft does not address when a service provider may be held liable for such data if the conditions for limiting liability are not met. Therefore, the provisions of the draft do not affect the legal remedies available to parties."*

73. According to all the aforementioned, the petitioner relies on the fulfillment of all the conditions of Article 24 of Act No. 31/1990 on Criminal Law in order to impose a legal ban on the conduct of the respondent.
74. The petitioner's claim is therefore deemed valid or accepted.
75. The petitioner demands that the requested injunction be imposed without requiring the petitioner to provide any guarantees.
76. The respondent relies on the basis that, according to Article 2 of Paragraph 30, in conjunction with numerical points 5 of Paragraph 3 of Article 16 of the Act on Administrative Procedure, the district commissioner is authorized to take such actions as described above without requiring a guarantee from the petitioner.
77. In any case, the petitioner firmly believes that the requested injunction will not result in any harm to the respondent.
78. The petitioner refers, in this regard, primarily to the terms of service of the respondent itself. With the consent of the respondent's customers, the respondent has relinquished all claims against the respondent upon the termination of the service or in the event that it becomes subject to any form of restraint.
79. Furthermore, the petitioner refers to the fact that the monthly subscription fee of the respondent's customers is very low.
80. Thirdly, the respondent provides web hosting services for businesses and individuals worldwide and, according to information provided by the respondent themselves, hosts thousands of websites for the aforementioned entities.
81. Hence, it is evident that if a requested injunction were imposed on the hosting of one of these thousands of websites, the respondent would incur a negligible loss of income resulting from the injunction's.
82. Based on the aforementioned reasons, it can be evident that the cessation of the conduct targeted by the injunction would not, under any circumstances, result in financial loss for the petitioner, neither directly, indirectly, nor consequentially.
83. However, if the district commissioner deems it necessary to request collateral from the respondent, it shall not be done unless the respondent provides evidence demonstrating the income derived from hosting the website, in order to assess the reasonable amount of the collateral, if applicable.

84. Fourthly, the petitioner relies on the fact that his claim is substantively justified, and the legitimacy of his action and the petition are unequivocal in light of the circumstances and aforementioned discussion, as understood in the interpretation of the provisions of Article 16, paragraph 3, subparagraph 5, of the Act on Procedure in Civil Cases.
85. In this regard, the petitioner also points out that there are no visible substantive reasons to suggest that the respondent would take precautions against the request and object to the success of the action.
86. With reference to the aforementioned, the petitioner believes it is right to impose the requested injunction without requiring them to provide collateral, in accordance with the aforementioned provisions of the Act.
87. The petitioner urges the respondent to inform the relevant authorities, through the prosecutor's office, about the individuals and/or entities associated with the website <https://mapliberation.org/> that the respondent hosts and engages in business with.
88. The petitioner reserves the right to submit additional evidence during the course of the case to the authority of the sheriff's office, as deemed necessary.
89. The petitioner requests that this injunction request be considered.

As soon as possible.

**Respectfully,**

**On behalf of the petitioner,**

**Sigurður Kári Kristjánsson, Esq.**  
**sigurdur@llg.is**

The following Documents are put forth:

Nr. 01 Injunction request.

Nr. 02 Power of Attorney, dated March 14, 2023.

Nr. 03 Printout from the corporate registry, valid registration for 1984 Ltd., dated March 14, 2023.

nr. 04 Email from the attorney of the respondent to the attorney of the petitioner, dated March 10, 2023.

Nr. 05 Challenge, dated March 3, 2023.

Nr. 06 Printout from the website <https://mapliberation.org/> - The Mapping Project - What is the Mapping Project?

- Nr. 07 Printout from the website <https://mapliberation.org/> - The Mapping Project — Anti-Defamation League (ADL).
- Nr. 08 Printout from the website <https://mapliberation.org/> - Zionism, Policing and Empire: A Dispatch from the Mapping Project, dated June 3, 2022.
- Nr. 09 Translation by Ellen Ingvadóttir, a certified court interpreter and document translator, applies to documents No. 6 and 8.
- Nr. 10. Translation of the petitioner's website [www.adl.org](http://www.adl.org) - ADL's Mission & History.
- Nr. 11. Translation of the petitioner's website [www.adl.org](http://www.adl.org) - ADL Regional Offices.
- Nr. 12. Translation of the petitioner's website [www.adl.org](http://www.adl.org) - Board of Directors.
- Nr. 13. Translation of the petitioner's website [www.adl.org](http://www.adl.org) - Leadership and Staff.
- Nr. 14. Printout of the respondent's website homepage [www.1984.is](http://www.1984.is).
- Nr. 15. Printout of the respondent's website [www.1984.is](http://www.1984.is) - About 1984 Hosting Company.
- Nr. 16. Printout of the respondent's website [www.1994.is](http://www.1994.is) - Terms of Service.
- Nr. 17 Email correspondence between the representative of the petitioner, on one hand, and the Ambassador of Iceland in Washington D.C. and the Office of the National Commissioner of the Icelandic Police, on the other hand, during the period from June 22, 2022, to July 12, 2022.
- Nr. 18 *5 Reasons Why the BDS Mapping Project is Dangerous for Jews (and Everyone Else)*, dated July 21, 2022, excerpt from the website [www.ajc.org](http://www.ajc.org).
- Nr. 19 *POV: Antisemitic Mapping Project Likely to Lead to More Anti-Jewish Violence*, Boston University, BU Today, dated June 16, 2022, excerpt from the website [www.bu.edu](http://www.bu.edu).
- Nr. 20 *"Simply put, it's dangerous," Jewish nonprofit leader says of The Mapping Project*, GBH News, June 17, 2022, excerpt from the website [www.wgbh.org](http://www.wgbh.org).
- Nr. 21 *Pro-Palestine mapping website raises alarm in Jewish groups*, AP News, June 30, 2022, excerpt from the website [www.apnews.com](http://www.apnews.com).
- Nr. 22 *What is hate speech?* By Dr. Davíð Þór Björgvinsson, Professor, dated April 25, 2022, excerpt from the website <https://uni.hi.is/davidth/2022/04/25/hvad-er-hatursordraeda/>.
- Nr. 23 *What is hate speech?* by Jóna Aðalheiður Pálmadóttir and Iuliana Kelnikova, dated November 7, 2019, from the Vísindavefur website, [www.visindavefur.is](http://www.visindavefur.is).
- Nr. 24 *Hate Speech: Overview of Current Laws and Regulations - Recommendations for the Future*  
Authors: Jóna Aðalheiður Pálmadóttir and Iuliana Kalenikova  
Publisher: Icelandic Human Rights Office, 2013

Nr. 25 *Could Face Capital Punishment for Attack on Synagogue*, RÚV News, dated April 25, 2023.

Nr. 26 *Warning of Planned Attacks on Synagogues*, RÚV News, dated November 4, 2022.

**{PLACEI, April 14, 2023,  
on behalf of Anti-Defamation League,**

**George Selim**

**Mr. George Selim  
Senior Vice President  
for National Affairs.**

==== footnote comments ====

See: Email from the lawyer of the petitioner to the lawyer of the respondent, dated March 10, 2023.

See: Translation by Ellen Ingvadóttir, legal interpreter and document translator, of the following original text: "We have shown physical address, named officers and leaders, and mapped connections. These entities exist in the physical world and can be disrupted in the physical world. We hope people will use our map to figure out how to push back effectively." (Source: <https://mapliberation.org>, Zionism, Policing and Empire: A Dispatch from the Mapping Project.)

See: 5 Reasons Why the BDS Mapping Project is Dangerous for Jews (and Everyone Else), dated July 21, 2022, excerpt from the website [www.ajc.org](http://www.ajc.org).

See: "What is Antisemitism?" is an article by Dr. Davíð Þór Björgvinsson, professor, published on April 25, 2022. You can find an excerpt of the article on the website <https://uni.hi.is/davidth/2022/04/25/hvad-er-hatursordraeda/>.

See: Further discussion on each step can be found in the article "What is Antisemitism?" by Dr. Davíð Þórs Björgvinsson, professor, dated April 25, 2022, as referenced in footnote 3.

See: Email from the attorney of the petitioner to the attorney of the respondent, dated March 10, 2023.