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Andre Rosenthal, Advocate

March 19, 2015
Reference: 2810/5

To
The Minister of Interior
2 Kaplan Street, Government Offices,
Jerusalem 91950
Facsimile: 02-5666376; Telephone: 02-6701400

Dear Sir,

Re: **Stay of Exit Order for Security Reasons: My Client Mr. _____ Gul, ID No. _____ : Objection**

1. We represent the above mentioned individual on behalf of HaMoked: Center for the Defence of the Individual, founded by Dr. Lotte Salzberger. Attached is a copy of a power of attorney. We would like to know if there is any open evidentiary material of any kind which may be transferred for our review. We would also like to receive a detailed paraphrase concerning the available data based on which the order was issued. We also request to enable us to complete our argument to the extent additional material is transferred to us.
2. My client totally denies the main argument underlying the temporary order according to which he is in contact with Popular Front activists abroad.
3. My client argues that the timing for the issue of the order is, in fact, related to the fact that two years ago he participated in the World Social Forum. The same Forum is about to convene again this year in Tunisia on March 23, 2015. We invite your honor to enter into the Forum's website and see that it concerns a meeting of a large variety of Non Governmental Organizations wishing to promote social objectives, planet conservation issues, etc. The address is: <http://fsm2015.org/en>.
4. My client has not been interrogated at all of the suspicions which were raised in the general grounds specified in the order itself, and it seems that these are futile suspicions having no basis in reality.
5. In 2014, my client went abroad twice, in March to France and in November to Belgium. Upon his return he has neither been interrogated nor questioned at all, in view of the fact that these were innocent travels which had nothing to do with any prohibited activity.

6. According to the order, it was issued based on "information". We don't know whether this information was provided by human or other sources. If the sources of the information are human, we request that before your honor makes a decision concerning the order, the Israel Security Agency (ISA) provides, for the perusal of your honor, detailed information regarding the sources so as to enable your honor to independently decide whether the existing information is reliable or not. We refer not only to the terms of engagement of said sources, but also to the methods by which they were recruited and whether the ISA has taken advantage of any weakness such sources may have had, thus causing them to provide the information. In such an event, we are of the opinion, that said information should be treated with great suspicion. We refer, for instance, to a family unification application which was submitted by the sources or a request for a permit to travel abroad or an entry permit into Israel for medical treatment of a family member, etc. We also request that your honor will be provided with detailed information regarding the consideration received by each and every source and whether it is a monthly salary or any other kind of consideration.
7. We also object to the issue of the order on the grounds that it violates, beyond need, the fundamental right of every resident of the state – including my client – namely, the right to go abroad.
8. We wish to stress that my client was tried more than six years ago and since then he has not been involved in any criminal activity whatsoever.
9. In view of all of the above, we request you to abolish the existing order which is in effect until April 8, 2015, and not to issue an additional order for a longer period.

Sincerely.

Andre Rosenthal, Advocate

Cc: Legal Bureau – Population and Immigration Authority
HaMoked: Center for the Defence of the Individual, founded by Dr. Lotte Salzberger