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[on official company letterhead]

Jerusalem, December 16, 2015

To:  
Mr. Matan Peleg, Executive Director  
“Im Tirzu”  
By fax – 02-5323002

Dear Sir,

Re: **Demand to remove injurious clip from the internet – “Planted” campaign**

We are writing to you on behalf of our client, HaMoked: Center for the Defence of the Individual, founded by Dr. Lotte Salzberger (Registered Association) regarding the matter in reference:

Yesterday, your organization launched a vile, despicable campaign, entitled “Planted”. As part of this campaign, Adv. Sigi Ben-Ari, a lawyer with our client’s legal department, is portrayed as a supporter of murderous terrorism, under the slogan, which borders on incitement to murder, “When we fight terror, the planted fight us”, with Adv. Ben-Ari’s photograph and name appearing in an ad designed as a “wanted” ad.

We (as many others) find the campaign and the vile objectives of those responsible for it wholly repugnant. Furthermore, our client considers the use of Adv. Ben Ari’s name and likeness extremely egregious. Adv. Ben Ari is a private individual prior to being a member of our client’s legal department, and has not consented to the use of her name or photograph.

In conceiving this campaign, and distributing it widely in the media while featuring the name of our client and of its staff member as supporters of terrorism and harm to innocents, you are causing grave damage to our client’s reputation, and the reputation of its workers both in Israel and abroad. Moreover, your message and the way it is presented amount to a license to kill the individuals appearing in the “wanted ads”, in a manner the ostensibly borders on incitement to murder.

Before we take immediate legal action against you, we demand that you remove the aforesaid ad from your website forthwith and see to it that any reference to our client or anyone working on its behalf in this campaign is removed from the internet. We further require that you issue an

immediate public apology for mentioning our client or anyone working on its behalf and for using the likeness of Adv. Sigi Ben Ari on the “wanted ad”.

The aforesaid, or anything omitted from the aforesaid, does not conclude our client’s claims or Adv. Sigi Ben Ari’s claims against your organization.

Sincerely,  
Ophir Katz, Adv.

CC: Ms. Dalia Kirstein, HaMoked: Center for the Defence of the Individual Executive Director