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[Firm letterhead]

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Itzhak Bam, Advocate (LL.M Harvard)  
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Jerusalem, 5 Tevet 5776  
Thursday, 17 Dec. 2015

To: Adv. Ophir Katz,

Via facsimile:  
026535360

Dear Sir,

**Re: "The Planted" ["Moles" Campaign] – Adv. Sigi Ben Ari**  
Reference: your letter to "Im Tirtzu" of December 16, 2015

Dear Colleague,

I hereby confirm receipt of your letter in reference. My clients, the "Im Tirtzu" movement and its directors have authorized me to give you the following response:

1. According to the information held by my clients, Adv. Sigi Ben Ari is a prominent activist in the organization "HaMoked: Center for the Defence of the Individual", which dedicates a considerable part of its activity to assisting terrorists and their family members to grapple with the measures the State of Israel employs against them. This diverse activity, which includes court actions, media appearances and such like, is abundantly financed by foreign state entities. Insofar as this information is untrue, my clients are prepared to correct the video clip and apologize to your client.
2. However, insofar as this information is true (and it has been carefully checked), then this is activity which bestows a humanitarian mantle to the perpetrators of terrorist

acts, and it is funded by foreign state entities that seek through this funding to promote their political interests. Your client is therefore operating through foreign funding in order to give legal assistance to perpetrators of terrorist acts, their families and their communities. The activity of your client is certainly legitimate in a democratic state and it is entitled to continue acting to provide, within the law, legal-humanitarian assistance to terrorists. It is undoubtedly your client's right to receive funding from foreign state entities, which seek to influence the political, social and security reality in Israel through this funding.

3. However, just as it is your client's right to fight against the means the State of Israel employs to suppress terrorism, and to defend the terrorists and their relatives in court, so is it my clients' right to express their opinion on this activity of your client, and on its character and personality as they are reflected by this activity. Thus also it is my clients' right to express their opinion on the fact that your client is conducting its said activity through foreign state funding and on the affinity which thus arises between your client and its activity and the financing states.
4. Insofar as your client considers that the video clip constitutes a violation of criminal law, its path to the nearest police station is paved. Insofar as your client considers that the video clip damages its good name and that my clients are not protected under Articles 14 and 15 of the Defamation Law – its path to court is paved. However, should your client choose to follow this path, it better equip itself for the journey, through ample and diverse documents as to its activity in the organization "HaMoked: Center for the Defence of the Individual", the organization's sources of funding and its reporting to its funders on promoting the goals for which the funding was given.

Respectfully  
[Signature]  
Itzhak Bam, Advocate