

**Date :** 8/12/2020 7:58:01 AM

**From :** "Vered Shpilman"

**To :** "מרי פוריציקי" , "HsYAEL@jerusalem.muni.il" , "yamits" , "ZippiB"

**Cc :** "Itai Apter" , "Nurit Inbal" , "'Dosoretz Karin (Karin.Dosoretz@mfa.gov.il)'" , "David.GoldfarbFW" , "Marlene Mazel" , "Esther Mendelsohn" , "Yarden Rubinshtein"

**Subject :** עדכון בנוגע לתיק גזהאן בארה"ב

**Attachment :** [696178\\_image001.jpg](#); [696178\\_image002.png](#); [696178\\_image003.jpg](#);

בוקר טוב לכולם,

נבקש לעדכן בהתפתחות שעורכי הדין דיווחו עליה מטה.

בתחילת השבוע, בית המשפט הוציא צו לפיו על הצדדים להעביר עדכון סטטוס בנוגע לתיק זה עד ליום 14.8.2020 (יום שישי הקרוב).

במסגרת החלטתו להוצאת הצו, ציין בית המשפט כי התביעה תלויה ועומדת בפניו כבר כארבעה חודשים, ללא כל פעילות בתיק. במסגרת זו, מציין בית המשפט את המכתב שנשלח מטעמנו באפריל האחרון. ראו לשון החלטת בית המשפט:

THIS CAUSE came before this Court upon a sua sponte examination of the record. The above-styled action has been pending before this Court without any activity for approximately four months. Upon a review of the docket, nothing substantive has been filed in this case since April 8, 2020, when the Israeli Official Defendants filed a letter to the Court. 7. UPON CONSIDERATION of the pertinent portions of the record and being otherwise fully advised in the premises, it is hereby ORDERED AND ADJUDGED that the Parties shall provide the Court with a Status Report on or before August 14, 2020, providing the Court with any information relevant to the status of the case.

עורכי הדין סבורים שהתפתחות זו עשויה להיות חיובית מבחינתנו ומציעים להגיש עדכון סטטוס קצר לבית המשפט, שיתמקד בנקודות הבאות: 1. אנו לא מודעים לכל פעילות בתיק זה, והמצאה לנתבעים לא בוצעה עדיין. 2. על בית המשפט לדחות את התביעה בשל "failure to prosecute". 3. כמו כן על בית המשפט לדחות את התביעה מכל הסיבות שפורטו במכתב שהגשנו לבית המשפט ביום 8.4.2020.

מכיוון שעלינו להגיש התייחסות לבית המשפט עד ליום שישי הקרוב נבקש כי **תוודאו שוב מול כל הנתבעים כי לא בוצעו כלפיהם המצאות בצורה ישירה** (ביחס להמצאה באמצעות אמנת האג – נזכיר, כי מנהל בתי המשפט סרב לבצעה בהתאם לסעיף 13 לאמנה מן הטעם של פגיעה בריבונות של מדינת ישראל). אנו מודעות לכך שהדבר נבדק על-ידיכם ממש בימים האחרונים, אולם עלינו להיות בטוחים כי אנו מצהירים לבית המשפט עובדות מדויקות ולכן חשוב לוודא זאת שוב בטרם תוגש התייחסות מטעמנו לבית המשפט. **אנא בדיקתכם כאמור עד למחר בשעות הצהריים.**

בנוסף, נבקש כי תהיו זמינים מחר על מנת לעיין בטיטוט עדכון הסטטוס לבית המשפט. בקשנו מעורכי הדין להעביר אלינו טיטוט עד סוף היום (שעון ארה"ב).

בברכה,

מרלין וורד

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**From:** Wirth, Stephen K. <Stephen.Wirth@arnoldporter.com>

**Sent:** Wednesday, August 12, 2020 12:42 AM

**To:** Mattan Gilboa <MattanP@justice.gov.il>; Nurit Inbal <NuritIn@justice.gov.il>;

David.GoldfarbFW <David.Goldfarb@mfa.gov.il>; 'Dosoretz Karin (Karin.Dosoretz@mfa.gov.il)'

<Karin.Dosoretz@mfa.gov.il>; Marlene Mazel <MarleneM@justice.gov.il>; מרי פוריציקי

<MaryP@molsa.gov.il>; 'HsYAEL@jerusalem.muni.il' <HsYAEL@jerusalem.muni.il>; yamits

<yamits@court.gov.il>; ZippiB <ZippiB@molsa.gov.il>; Esther Mendelsohn

<EstherMe@justice.gov.il>; רננה תכלת' - Renee Techelet' <ReneeT@molsa.gov.il>; Yarden

Rubinshtein <YardenRu@justice.gov.il>; Vered Shpilman <VeredSh@justice.gov.il>  
**Cc:** Anderson, Reeves <Reeves.Anderson@arnoldporter.com>; Bellinger III, John B.  
<John.Bellinger@arnoldporter.com>  
**Subject:** RE: Recent developments in the Gazahan case

Dear Marlene and Company,

We have what we think is good news in the *Gazahan* case. As you know, we filed a letter several months ago (attached) urging the court to dismiss the case sua sponte. The court rejected our request at the time, and there has been no activity in the case since then. But yesterday, the judge issued an order sua sponte requiring the parties to file a status update on the case by August 14, 2020. The full text of the order is:

THIS CAUSE came before this Court upon a sua sponte examination of the record. The above-styled action has been pending before this Court without any activity for approximately four months. Upon a review of the docket, nothing substantive has been filed in this case since April 8, 2020, when the Israeli Official Defendants filed a letter to the Court. 7. UPON CONSIDERATION of the pertinent portions of the record and being otherwise fully advised in the premises, it is hereby ORDERED AND ADJUDGED that the Parties shall provide the Court with a Status Report on or before August 14, 2020, providing the Court with any information relevant to the status of the case.

While the Israeli officials haven't been served yet, we think it would be advantageous to file a short status update in response to the court's request. The update would state: (1) we are not aware of any activity in the matter, and we have not been served; (2) the court could dismiss the action for failure to prosecute; and (3) the court could dismiss for any of the other reasons stated in our April 8 letter (which we would attach).

We will prepare a draft of this update for you to review. In the meantime, do not hesitate to reach out with any questions.

Best regards,  
Stephen

Stephen K. Wirth  
**Arnold & Porter**  
+1 202.942.6739

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**From:** Anderson, Reeves <[Reeves.Anderson@arnoldporter.com](mailto:Reeves.Anderson@arnoldporter.com)>  
**Sent:** Tuesday, June 30, 2020 12:51  
**To:** [zzz.External.MattanP@justice.gov.il](mailto:zzz.External.MattanP@justice.gov.il) <[MattanP@justice.gov.il](mailto:MattanP@justice.gov.il)>; Bellinger III, John B. <[John.Bellinger@arnoldporter.com](mailto:John.Bellinger@arnoldporter.com)>; Wirth, Stephen K. <[Stephen.Wirth@arnoldporter.com](mailto:Stephen.Wirth@arnoldporter.com)>  
**Cc:** Nurit Inbal <[NuritIn@justice.gov.il](mailto:NuritIn@justice.gov.il)>; [zzz.External.David.Goldfarb@mfa.gov.il](mailto:zzz.External.David.Goldfarb@mfa.gov.il) <[David.Goldfarb@mfa.gov.il](mailto:David.Goldfarb@mfa.gov.il)>; 'Dosoretz Karin ([Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il))' <[Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il)>; [zzz.External.MarleneM@justice.gov.il](mailto:zzz.External.MarleneM@justice.gov.il) <[MarleneM@justice.gov.il](mailto:MarleneM@justice.gov.il)>; פוריצקי מרי <[MaryP@molsa.gov.il](mailto:MaryP@molsa.gov.il)>; 'HsYAEL@jerusalem.muni.il' <[HsYAEL@jerusalem.muni.il](mailto:HsYAEL@jerusalem.muni.il)>;

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**Subject:** RE: Recent developments in the Gazahan case

Dear Mattan, thank you for passing along this update. Although the US case seems to be standing still at the moment, I appreciate you keeping us posted of further developments so that we understand the current state of play.

Best,  
Reeves

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**Robert Reeves Anderson**  
**Partner, Arnold & Porter**  
1144 Fifteenth St., #3100  
Denver, CO 80202  
303.863.2325 (o) | [vCard](#)

---

**From:** Mattan Gilboa <[MattanP@justice.gov.il](mailto:MattanP@justice.gov.il)>  
**Sent:** Tuesday, June 30, 2020 5:42 AM  
**To:** Anderson, Reeves <[Reeves.Anderson@arnoldporter.com](mailto:Reeves.Anderson@arnoldporter.com)>; Bellinger III, John B. <[John.Bellinger@arnoldporter.com](mailto:John.Bellinger@arnoldporter.com)>; Wirth, Stephen K. <[Stephen.Wirth@arnoldporter.com](mailto:Stephen.Wirth@arnoldporter.com)>  
**Cc:** Nurit Inbal <[NuritIn@justice.gov.il](mailto:NuritIn@justice.gov.il)>; [zzz.External.David.Goldfarb@mfa.gov.il](mailto:zzz.External.David.Goldfarb@mfa.gov.il) <[David.Goldfarb@mfa.gov.il](mailto:David.Goldfarb@mfa.gov.il)>; 'Dosoretz Karin ([Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il))' <[Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il)>; [zzz.External.MarleneM@justice.gov.il](mailto:zzz.External.MarleneM@justice.gov.il) <[MarleneM@justice.gov.il](mailto:MarleneM@justice.gov.il)>; מרי פוריצקי <[MaryP@molsa.gov.il](mailto:MaryP@molsa.gov.il)>; 'HsYAEL@jerusalem.muni.il' <[HsYAEL@jerusalem.muni.il](mailto:HsYAEL@jerusalem.muni.il)>; yamits <[yamits@court.gov.il](mailto:yamits@court.gov.il)>; ZippiB <[ZippiB@molsa.gov.il](mailto:ZippiB@molsa.gov.il)>; Esther Mendelsohn <[EstherMe@justice.gov.il](mailto:EstherMe@justice.gov.il)>; רבנה תכלת' - Renee Techelet' <[ReneeT@molsa.gov.il](mailto:ReneeT@molsa.gov.il)>; Yarden Rubinshtein <[YardenRu@justice.gov.il](mailto:YardenRu@justice.gov.il)>; [zzz.External.VeredSh@justice.gov.il](mailto:zzz.External.VeredSh@justice.gov.il) <[VeredSh@justice.gov.il](mailto:VeredSh@justice.gov.il)>  
**Subject:** Recent developments in the Gazahan case

**External E-mail**

Dear Reeves,

I hope this finds you well. I wanted to update you on some recent developments in the Gazahan case:

The Court recently ordered the children be returned to their home. Social Services has 45 days to file an appeal; they have convened an emergency committee and the committee is reviewing the matter to determine if there are grounds for an appeal.

Social Services also told us that the Court's decision follows an order that the eldest daughter Mercy should return to live with her father; they noted that this arrangement ended two days ago when Mercy left the father's home in a rush; They claimed that her father was violent towards her. They noted however that despite Mercy's situation, the two younger daughters are reportedly doing fine.

We will keep you posted.

Kind regards,

Mattan

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**From:** Vered Shpilman <[VeredSh@justice.gov.il](mailto:VeredSh@justice.gov.il)>  
**Sent:** Tuesday, May 26, 2020 10:04 PM  
**To:** 'Anderson, Reeves' <[Reeves.Anderson@arnoldporter.com](mailto:Reeves.Anderson@arnoldporter.com)>; Bellinger III, John B. <[John.Bellinger@arnoldporter.com](mailto:John.Bellinger@arnoldporter.com)>; Wirth, Stephen K. <[Stephen.Wirth@arnoldporter.com](mailto:Stephen.Wirth@arnoldporter.com)>  
**Cc:** Nurit Inbal <[NuritIn@justice.gov.il](mailto:NuritIn@justice.gov.il)>; David.GoldfarbFW <[David.Goldfarb@mfa.gov.il](mailto:David.Goldfarb@mfa.gov.il)>; 'Dosoretz Karin (Karin.Dosoretz@mfa.gov.il)' <[Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il)>; Mattan Gilboa <[MattanP@justice.gov.il](mailto:MattanP@justice.gov.il)>; Marlene Mazel <[MarleneM@justice.gov.il](mailto:MarleneM@justice.gov.il)>; מרי פוריציקי <[MaryP@molsa.gov.il](mailto:MaryP@molsa.gov.il)>; 'HsYAEL@jerusalem.muni.il' <[HsYAEL@jerusalem.muni.il](mailto:HsYAEL@jerusalem.muni.il)>; yamits <[yamits@court.gov.il](mailto:yamits@court.gov.il)>; ZippiB <[ZippiB@molsa.gov.il](mailto:ZippiB@molsa.gov.il)>; Esther Mendelsohn <[EstherMe@justice.gov.il](mailto:EstherMe@justice.gov.il)>; 'רונה תכלת - Renee Techelet' <[ReneeT@molsa.gov.il](mailto:ReneeT@molsa.gov.il)>; Yarden Rubinshtein <[YardenRu@justice.gov.il](mailto:YardenRu@justice.gov.il)>  
**Subject:** Gazahan timeline

Dear Reeves,

I hope all is well!

As mentioned before, Renee has prepared a factual timeline, regarding the involvement of the Department of International Relations in the Ministry of Labor, Social Affairs and Social Services – in the Gazahan case. The municipality of Jerusalem added some information from their knowledge and Renee has added it into this file, for your convenience. Please also see some of Renee's additional comments in the text below.

The timeline is meant to provide some background for you on this case, but please note it should not be used in the U.S. proceedings without prior discussion and authorization.

Please let us know if any clarifications are needed.

Kind regards,

Vered

Renee wrote:

Before addressing the allegations made in the lawsuit, I would like to explain that the role of the Department of International Relations in the Ministry of Labor, Social Affairs and Social Services is to represent the ministry vis-à-vis international bodies. The role of the International Welfare Service (IWS) within the Department of International Relations is to coordinate each welfare case between two states and also to examine the feasibility of social programs in the affairs of minors under an order that their parents wish to emigrate to another country.

The department and the IWS are not in direct contact with the welfare patients, but with the social workers responsible for their cases. Therefore, we are not responsible for decisions such as child removal orders. Therefore, the attached Timeline contains all the information that has come to the Department for the purpose of fulfilling its role, and does not include dates regarding the care planning committee or regarding the discussions of extension of orders that did not come to our attention [This data should be obtained from the municipality of Jerusalem].

The Timeline provides a general description of the case and refutes main arguments raised by the prosecution (for example, claims concerning the time of Mr. Gezahegne's entry into the country, or that the proceedings regarding the children were conducted in a juvenile court, etc.).

I will also add that the Timeline is parallel to Mr Gezahegne's wife unfinished family law process (marked in yellow), who suffers greatly, and asked to have sole custody of the children so that she could leave with them alone to Canada.

It should be noted that I have never met Mr. Gezahegne, but from all the discussions regarding his case as well as the reading of reports and protocols it is clear that this is a very difficult, manipulative and violent person.

As for the specific allegations-

-Mr. Gezahegne has entered Israel in 2008, not in 2018, and neither his wife nor he received refugee status.

-As far as we know, he claimed in his refugee status request that he was being pursued politically by the Ethiopian authorities, which did not prevent him from contacting the Ethiopian embassy and putting great pressure on it to act on his case.

-Please note that on January 6, 2020, the Court of Appeals dismissed Mr. Gezahegne's motion for appeal as to his refugee status, which he may have referred to in this lawsuit.

-Neither WIZO nor the Schusterman Foundations removed the children from the home. The children were taken out by social workers in accordance with the Juvenile Care and supervision law, and subject to a court-ordered procedure after investigating the children and reporting serious violence involving the use of objects.

-The reason we intervened in the matter is that Mr. Gezahegne contacted the Ethiopian Embassy, who contacted the Israeli Foreign Ministry and who then contacted us. This is how we were involved in the issue during the time from when the children were taken out of the house and until the summer of 2019. Throughout that time, Mr. Gezahegne 'drove the system crazy' (I apologizing for the language but it reflects reality, even if it is informal) - he came to visit the children and asked them to say they were being abused while holding a camera, also pressured the children during phone calls, until eventually the social workers decided that the children will not return home on weekends. We kept all the emails from that period, if you want to see them.

-A police complaint has been filed against Mr Gezahegne, following violence against the caregiver staff and social workers. As mentioned, I have never met him and I have never filed a police complaint against him.

-We did not report on Mr. Gezahegne to the immigration authorities but the Foreign Ministry may have done so. In any case, the intent was all along to allow Mr. Gezahegne to go abroad with his family, but to ensure that wherever they went, the children would be recognized and protected by the welfare authorities. At no point was there any plan to leave the children alone in Israel.

-My international travels are work related and I do not meet with any donors or funds. My latest trip to Geneva was to represent the ministry in the CESCRC Convention Committee; the issues of asylum seekers and non-deportable immigrants were discussed within its framework, and the answers I provided are grounded in state decisions.

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**From:** Anderson, Reeves <[Reeves.Anderson@arnoldporter.com](mailto:Reeves.Anderson@arnoldporter.com)>

**Sent:** Friday, May 1, 2020 12:38 AM

**To:** Vered Shpilman <[VeredSh@justice.gov.il](mailto:VeredSh@justice.gov.il)>; Bellinger III, John B.

<[John.Bellinger@arnoldporter.com](mailto:John.Bellinger@arnoldporter.com)>; Wirth, Stephen K. <[Stephen.Wirth@arnoldporter.com](mailto:Stephen.Wirth@arnoldporter.com)>

**Cc:** Nurit Inbal <[NuritIn@justice.gov.il](mailto:NuritIn@justice.gov.il)>; David.GoldfarbFW <[David.Goldfarb@mfa.gov.il](mailto:David.Goldfarb@mfa.gov.il)>;

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<[EstherMe@justice.gov.il](mailto:EstherMe@justice.gov.il)>; Yarden Rubinshtein <[YardenRu@justice.gov.il](mailto:YardenRu@justice.gov.il)>

**Subject:** RE: Gazahan - Translations

Dear Vered,

Thank you for sharing these translations. They provide important context to the U.S. dispute and give me a better picture of the ongoing child-welfare issues in Israel. We understand that these documents remain under seal and are not to be used in the U.S. proceedings without prior discussion and authorization.

Best,  
Reeves

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**Robert Reeves Anderson**  
**Partner, Arnold & Porter**  
1144 Fifteenth St., #3100 \*  
Denver, CO 80202  
303.863.2325 (o) | [vCard](#)

*\*Please note new address (as of April 6, 2020)*

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**From:** Vered Shpilman  
**Sent:** Thursday, April 30, 2020 2:38 AM  
**To:** Bellinger III, John B. ; Wirth, Stephen K. ; Anderson, Reeves  
**Cc:** Nurit Inbal ; [zzz.External.David.Goldfarb@mfa.gov.il](mailto:zzz.External.David.Goldfarb@mfa.gov.il) ; 'Dosoretz Karin ([Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il))' ; [zzz.External.MattanP@justice.gov.il](mailto:zzz.External.MattanP@justice.gov.il) ; [zzz.External.MarleneM@justice.gov.il](mailto:zzz.External.MarleneM@justice.gov.il) ; מרי פוריציקי ; 'HsYAEL@jerusalem.muni.il' ; yamits ; ZippiB ; Esther Mendelsohn ; Yarden Rubinshtein  
**Subject:** Gazahan - Translations

**External E-mail**

Dear Reeves,

Following our previous email, we have received an unofficial translations of the Supreme court latest decision in this case, as well as the District court. We have also received a translation of the application for leave to appeal to the Supreme Court and the state's response for the appeal in the District Court.

As mentioned before, these documents are under seal and therefore should not be submitted or otherwise used in the proceedings, unless discussed and agreed otherwise.

Also, Renee has prepared a factual timeline that we will circulate, hopefully next week.

Kind regards,

Vered

, Adv.**Vered Shpilman**  
Legal Counsel, Foreign Litigation Division | Department of International Law  
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**From:** Vered Shpilman <[VeredSh@justice.gov.il](mailto:VeredSh@justice.gov.il)>  
**Sent:** Tuesday, April 7, 2020 8:34 PM  
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**Cc:** Nurit Inbal <[NuritIn@justice.gov.il](mailto:NuritIn@justice.gov.il)>; David.GoldfarbFW <[David.Goldfarb@mfa.gov.il](mailto:David.Goldfarb@mfa.gov.il)>; 'Dosoretz Karin (Karin.Dosoretz@mfa.gov.il)' <[Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il)>; Mattan Gilboa <[MattanP@justice.gov.il](mailto:MattanP@justice.gov.il)>; Marlene Mazel <[MarleneM@justice.gov.il](mailto:MarleneM@justice.gov.il)>; Itai Apter <[ItaiA@justice.gov.il](mailto:ItaiA@justice.gov.il)>; Yael Weiner <[Yaelw@justice.gov.il](mailto:Yaelw@justice.gov.il)>  
**Subject:** RE: Gazahan - Article 13 letter

Dear John, Reeves and Stephen,

Please see attached the Article 13 letter, signed by The Director of Courts.

The letter should be sent out this evening, or tomorrow morning.

Also, we have gathered some of the courts decisions in this case and we are having it translated for you. We hope it will give you some backgrounds on this case. As to the Supreme court latest decision, until the translation will arrive, we can summarize it for you as follows:

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1. [Supreme Court Civil Decision on Appeal Request no. 1004/20 Ploni \(John Doe\) vs. Ifaat Moyal, Welfare official of the Juvenile Law \(9 February, 2020\):](#)

#### **Decision by Justice Solberg rejecting the Mr. Gezahegne's Request to appeal.**

Justice Solberg did not see room to intervene once again in the decision of the professional bodies to remove the children from the custody of their parents, which was approved in the lower courts. He emphasized that the request does not raise a fundamental legal question, or concerns about a distortion of law that justify an appeal in this case.

2. [Summary of the the Mr. Gezahegne's Request to appeal \(filed on 5 February, 2020\):](#)

#### **Background (para 17-26):**

Applicants do not have legal status in Israel. The father is an Ethiopian citizen and the Eritrean citizen. Their home speaks English. The seven children are not in need. They describe the suffering of the children, which is split between the various institutions, and the experiences they go



through in those institutions. The depiction of the violence the children suffered is false and is due to a false speech by the social worker.

**Main arguments (para. 1-16):**

1. This request raises legal, political, and diplomatic questions that the district court and juvenile court did not address regarding the legal rights of refugees, foreign nationals, and stateless persons, and the rights of their children for normal family life and family autonomy under international law.
2. The Israeli authorities and courts are not allowing Mr. Gezahegne's to Leave the country voluntarily, using the voluntary departure services.
3. The welfare institutions where Mr. Gezahegne's children currently stay make a lot of money at their expense and the children's current caregiver also has a financial interest in this arrangement. Daniel (one of the children) is housed in a psychiatric institution without proper diagnoses.
4. In this case, the children were removed from their home with an emergency order and without any judicial review. In practice, the parents continue to raise 3 children out of the 7, which creates an ironic situation in which they are fit to raise only part of them.
5. The children suffered as a result of their stay for a year in institutions outside their home. The Parents have recordings of the children but the court is not accepting them as evidence, does not allow cross-examination of the social worker or presentation of any other evidence.
6. This case illustrates how much the State of Israel harms the refugee children.
7. The Ethiopian Embassy and UNHCR have sought to diplomatically intervene in favor of and release the children.
8. This is a case of child abduction in which the children have special status that warrants court intervention.
9. Yifaat Moyal, the social worker, guaranteed the mother false promises that she would arrange for her immigration to Canada or Australia if the mother agreed to file a false complaint against the father in return.
10. The State of Israel speaks in two voices - on the one hand it actively works to deport African infiltrators and on the other it insists on holding children in its institutions for years, until they're 18 and become deportable.

**Reasons for Appeal (para 27-44):**

1. The violation of the right of refugees and stateless persons to voluntarily leave the country with their children.
2. The Disregard for rights under international law for refugees and stateless persons.
3. Incorrect factual description of the social worker who did not stand the test of cross-examination.
4. The fact that Daniel was placed in a psychiatric boarding school for no reason.

We will send you the translated decisions, hopefully next week. As mentioned during our conversation yesterday – these decisions are under Seal.

Kind regards,

Mattan and Vered

---

**From:** Wirth, Stephen K.  
**Sent:** Monday, April 6, 2020 9:46 PM  
**To:** Vered Shpilman ; Anderson, Reeves  
**Cc:** Bellinger III, John B. ; Nurit Inbal ; David.GoldfarbFW ; 'Dosoretz Karin (Karin.Dosoretz@mfa.gov.il)'; Mattan Gilboa ; Marlene Mazel ; Itai Apter ; Yael Weiner  
**Subject:** RE: Gazahan - Article 13 letter

Hello all,

As requested, here is Gazahan's IFP application.

Stephen

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**From:** Vered Shpilman <[VeredSh@justice.gov.il](mailto:VeredSh@justice.gov.il)>  
**Sent:** Monday, April 6, 2020 13:03  
**To:** Anderson, Reeves <[Reeves.Anderson@arnoldporter.com](mailto:Reeves.Anderson@arnoldporter.com)>  
**Cc:** Bellinger III, John B. <[John.Bellinger@arnoldporter.com](mailto:John.Bellinger@arnoldporter.com)>; Nurit Inbal <[NuritIn@justice.gov.il](mailto:NuritIn@justice.gov.il)>; [zzz.External.David.Goldfarb@mfa.gov.il](mailto:zzz.External.David.Goldfarb@mfa.gov.il) <[David.Goldfarb@mfa.gov.il](mailto:David.Goldfarb@mfa.gov.il)>; 'Dosoretz Karin (Karin.Dosoretz@mfa.gov.il)' <[Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il)>; Wirth, Stephen K. <[Stephen.Wirth@arnoldporter.com](mailto:Stephen.Wirth@arnoldporter.com)>; [zzz.External.MattanP@justice.gov.il](mailto:zzz.External.MattanP@justice.gov.il) <[MattanP@justice.gov.il](mailto:MattanP@justice.gov.il)>; [zzz.External.MarleneM@justice.gov.il](mailto:zzz.External.MarleneM@justice.gov.il) <[MarleneM@justice.gov.il](mailto:MarleneM@justice.gov.il)>; [zzz.External.ItaiA@justice.gov.il](mailto:zzz.External.ItaiA@justice.gov.il) <[ItaiA@justice.gov.il](mailto:ItaiA@justice.gov.il)>; Yael Weiner <[Yaelw@justice.gov.il](mailto:Yaelw@justice.gov.il)>  
**Subject:** RE: Gazahan - Article 13 letter

External E-mail

Hey Reeves,

After additional discussions, please see our updated version of the Article 13 letter.

Since para 229 of the guideline does not require us to specify what exactly in the request infringes upon the sovereignty, we think it is better not to specify at all:

According to Article 13(3), the requested State, through its Central Authority, must promptly inform the forwarding authority of its decision to refuse compliance with the request. It must also provide reasons for its refusal to comply. However, it is not necessary to provide express and detailed reasons. Rather, the recording of the grounds upon which the request was refused, *i.e.*, that it infringed “sovereignty or security” under Article 13(1), seems sufficient. The reasons must be provided as part of the Certificate (of non-service), issued in conformity with Article 6(2).<sup>320</sup>

In addition we wanted to have your opinion about filling out a form under Article 6 of the Convention, and attaching the letter to the form.

#### Article 6

The Central Authority of the State addressed or any authority which it may have designated for that purpose, shall complete a certificate in the form of the model annexed to the present Convention. The certificate shall state that the document has been served and shall include the method, the place and the date of service and the person to whom the document was delivered. If the document has not been served, the certificate shall set out the reasons which have prevented service. The applicant may require that a certificate not completed by a Central Authority or by a judicial authority shall be countersigned by one of these authorities. The certificate shall be forwarded directly to the applicant.

We will be glad to hear your thoughts on this during our call tonight.

Best regards,

Vered

, Adv. **Vered Shpilman**

Legal Counsel, Foreign Litigation Division | Department of International Law

☎ 073-3928725 / 050-6117011

✉ [VeredSh@justice.gov.il](mailto:VeredSh@justice.gov.il)



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**From:** Vered Shpilman

**Sent:** Monday, April 6, 2020 6:44 PM

**To:** 'Anderson, Reeves' <[Reeves.Anderson@arnoldporter.com](mailto:Reeves.Anderson@arnoldporter.com)>

**Cc:** Bellinger III, John B. <[John.Bellinger@arnoldporter.com](mailto:John.Bellinger@arnoldporter.com)>; Nurit Inbal <[NuritIn@justice.gov.il](mailto:NuritIn@justice.gov.il)>; David.GoldfarbFW <[David.Goldfarb@mfa.gov.il](mailto:David.Goldfarb@mfa.gov.il)>; Dosoretz Karin (Karin.Dosoretz@mfa.gov.il) <[Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il)>; Wirth, Stephen K. <[Stephen.Wirth@arnoldporter.com](mailto:Stephen.Wirth@arnoldporter.com)>; Mattan Gilboa <[MattanP@justice.gov.il](mailto:MattanP@justice.gov.il)>; Marlene Mazel <[MarleneM@justice.gov.il](mailto:MarleneM@justice.gov.il)>

**Subject:** RE: Gazahan - Article 13 letter

Perhaps discussing tonight would be better. Thanks.

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**From:** Anderson, Reeves <[Reeves.Anderson@arnoldporter.com](mailto:Reeves.Anderson@arnoldporter.com)>  
**Sent:** Monday, April 6, 2020 5:50 PM  
**To:** Vered Shpilman <[VeredSh@justice.gov.il](mailto:VeredSh@justice.gov.il)>  
**Cc:** Bellinger III, John B. <[John.Bellinger@arnoldporter.com](mailto:John.Bellinger@arnoldporter.com)>; Nurit Inbal <[NuritIn@justice.gov.il](mailto:NuritIn@justice.gov.il)>; David.GoldfarbFW <[David.Goldfarb@mfa.gov.il](mailto:David.Goldfarb@mfa.gov.il)>; Dosoretz Karin (Karin.Dosoretz@mfa.gov.il) <[Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il)>; Wirth, Stephen K. <[Stephen.Wirth@arnoldporter.com](mailto:Stephen.Wirth@arnoldporter.com)>; Mattan Gilboa <[MattanP@justice.gov.il](mailto:MattanP@justice.gov.il)>; Marlene Mazel <[MarleneM@justice.gov.il](mailto:MarleneM@justice.gov.il)>  
**Subject:** RE: Gazahan - Article 13 letter

No worries, Vered. Please let me know if you'd like me to send comments prior to our call tonight. Otherwise we can discuss then.

Best,  
Reeves

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**From:** Vered Shpilman <[VeredSh@justice.gov.il](mailto:VeredSh@justice.gov.il)>  
**Sent:** Monday, April 6, 2020 8:43 AM  
**To:** Anderson, Reeves <[Reeves.Anderson@arnoldporter.com](mailto:Reeves.Anderson@arnoldporter.com)>  
**Cc:** Bellinger III, John B. <[John.Bellinger@arnoldporter.com](mailto:John.Bellinger@arnoldporter.com)>; Nurit Inbal <[NuritIn@justice.gov.il](mailto:NuritIn@justice.gov.il)>; [zzz.External.David.Goldfarb@mfa.gov.il](mailto:zzz.External.David.Goldfarb@mfa.gov.il) <[David.Goldfarb@mfa.gov.il](mailto:David.Goldfarb@mfa.gov.il)>; Dosoretz Karin (Karin.Dosoretz@mfa.gov.il) <[Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il)>; Wirth, Stephen K. <[Stephen.Wirth@arnoldporter.com](mailto:Stephen.Wirth@arnoldporter.com)>; [zzz.External.MattanP@justice.gov.il](mailto:zzz.External.MattanP@justice.gov.il) <[MattanP@justice.gov.il](mailto:MattanP@justice.gov.il)>; [zzz.External.MarleneM@justice.gov.il](mailto:zzz.External.MarleneM@justice.gov.il) <[MarleneM@justice.gov.il](mailto:MarleneM@justice.gov.il)>  
**Subject:** RE: Gazahan - Article 13 letter

External E-mail

Dear Reeves,

Apologies. We are still consulting regarding this. Perhaps we can discuss tonight.

Vered

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**From:** Vered Shpilman <[VeredSh@justice.gov.il](mailto:VeredSh@justice.gov.il)>  
**Sent:** Monday, April 6, 2020 4:04 PM  
**To:** 'Anderson, Reeves' <[Reeves.Anderson@arnoldporter.com](mailto:Reeves.Anderson@arnoldporter.com)>  
**Cc:** Bellinger III, John B. <[John.Bellinger@arnoldporter.com](mailto:John.Bellinger@arnoldporter.com)>; Nurit Inbal <[NuritIn@justice.gov.il](mailto:NuritIn@justice.gov.il)>; David.GoldfarbFW <[David.Goldfarb@mfa.gov.il](mailto:David.Goldfarb@mfa.gov.il)>; Dosoretz Karin (Karin.Dosoretz@mfa.gov.il) <[Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il)>; Wirth, Stephen K. <[Stephen.Wirth@arnoldporter.com](mailto:Stephen.Wirth@arnoldporter.com)>; Mattan Gilboa <[MattanP@justice.gov.il](mailto:MattanP@justice.gov.il)>; Marlene Mazel <[MarleneM@justice.gov.il](mailto:MarleneM@justice.gov.il)>  
**Subject:** RE: Gazahan - Article 13 letter

Dear Reeves,

Many thanks for sending your comments. Please see additional proposed comments by the team. If you could take a quick look before we circulate it to the Director of Courts, that would be very helpful.

Kind regards,

Vered

, Adv. **Vered Shpilman**

Legal Counsel, Foreign Litigation Division | Department of International Law

☎ 073-3928725 / 050-6117011

✉ [VeredSh@justice.gov.il](mailto:VeredSh@justice.gov.il)



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**From:** Anderson, Reeves <[Reeves.Anderson@arnoldporter.com](mailto:Reeves.Anderson@arnoldporter.com)>

**Sent:** Saturday, April 4, 2020 2:14 AM

**To:** Marlene Mazel <[MarleneM@justice.gov.il](mailto:MarleneM@justice.gov.il)>

**Cc:** Bellinger III, John B. <[John.Bellinger@arnoldporter.com](mailto:John.Bellinger@arnoldporter.com)>; Nurit Inbal <[NuritIn@justice.gov.il](mailto:NuritIn@justice.gov.il)>;

Vered Shpilman <[VeredSh@justice.gov.il](mailto:VeredSh@justice.gov.il)>; David.GoldfarbFW <[David.Goldfarb@mfa.gov.il](mailto:David.Goldfarb@mfa.gov.il)>;

Dosoretz Karin (Karin.Dosoretz@mfa.gov.il) <[Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il)>; Wirth, Stephen K.

<[Stephen.Wirth@arnoldporter.com](mailto:Stephen.Wirth@arnoldporter.com)>

**Subject:** RE: Gazahan - Article 13 letter

Dear Marlene,

We are very pleased to represent you in the Gazahan matter in Florida. We are hopeful that we can resolve the case quickly.

To that end, I have attached some proposed revisions to the Article 13 letter to hew more closely to the text of the Convention. Please let me know if you have any questions.

Best,  
Reeves

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**Robert Reeves Anderson**

**Partner, Arnold & Porter**

370 Seventeenth St., #4400

Denver, CO 80202-1370

303.863.2325 (o) | [vCard](#)

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**From:** Marlene Mazel  
**Sent:** Monday, March 30, 2020 2:07 AM  
**To:** Anderson, Reeves  
**Cc:** Bellinger III, John B. ; Nurit Inbal ; [zzz.External.VeredSh@justice.gov.il](mailto:zzz.External.VeredSh@justice.gov.il) ;  
[zzz.External.David.Goldfarb@mfa.gov.il](mailto:zzz.External.David.Goldfarb@mfa.gov.il) ; Dosoretz Karin ([Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il))  
**Subject:** Gazahan - Article 13 letter

**External E-mail**

Dear Reeves,

With regard to the Gazahan matter, we hope that we will receive a decision of the committee to retain Arnold and Porter within the next few days. In the interim, we would like the firm to review the attached Article 13 draft letter, and we would appreciate if you could send us any comments that you have in track changes, as we would like to relay it this week (Unless you think we should wait for the in forma pauperis letter).

Once we get the approvals, we will let you know.

Marlene

Marlene

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**From:** Vered Shpilman  
**Sent:** Monday, March 30, 2020 10:55 AM  
**To:** Marlene Mazel  
**Subject:** FW: 13 סעיף ואח' - סירוב להמצאה לפי סעיף 13

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**From:** Nurit Inbal <[NuritIn@justice.gov.il](mailto:NuritIn@justice.gov.il)>  
**Sent:** Sunday, March 29, 2020 6:53 PM  
**To:** Vered Shpilman <[VeredSh@justice.gov.il](mailto:VeredSh@justice.gov.il)>  
**Cc:** Marlene Mazel <[MarleneM@justice.gov.il](mailto:MarleneM@justice.gov.il)>; Yael Weiner <[Yaelw@justice.gov.il](mailto:Yaelw@justice.gov.il)>; Itai Apter <[ItaiA@justice.gov.il](mailto:ItaiA@justice.gov.il)>  
**Subject:** תביעה בארה"ב - גזהאן נ' גרויסמן ואח' - סירוב להמצאה לפי סעיף 13

הי ורד,

בהמשך לשיחת הוועידה שהתקיימה בשבוע שעבר עם ג'ון וריבס ולשיחתנו לאחריה, מצ"ב טיוטת מכתב סירוב להמצאה בתיק גזהאן נגד נשיאת ושופטי בית המשפט העליון, ועובדות משרד הרווחה.

לדעתנו, למרות שריבס הציע להגיש קודם מכתב לשופט שאולי יאפשר את דחיית התביעה על הסף, יש מקום לקדם בדחיפות גם את הסירוב להמצאה, מכיוון שבקשת ההמצאה התקבלה בהנהלת בתי המשפט כבר ביום

19.3.20, ולפי אמנת האג מדינה שרוצה לסרב להמצאה צריכה להודיע על כך promptly.

אנו מציעים לבקש מריבס להציץ קצרות בנוסח המכתב המצ"ב, המבוסס על נוסחים בתיקים אחרים, ולאחר מכן להעביר את שאלת הסירוב להחלטת רועי. במקביל נבקש לוודא מול משרד החוץ, הנהלת בתי המשפט ומשרד הרווחה שגם הם תומכים בשליחת ההודעה על סירוב להמצאה לפי סעיף 13.

בברכה,

נורית

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**From:** Marlene Mazel

**Sent:** Friday, March 20, 2020 12:52 PM

**To:** yamits; EdiWFW

**Cc:** Roy Schondorf; 'ברק לייזר'; Hila Tene-Gilad; Nurit Inbal; David.GoldfarbFW; Dosoretz Karin ([Karin.Dosoretz@mfa.gov.il](mailto:Karin.Dosoretz@mfa.gov.il)); Noa Schreuer; Vered Shpilman; Yarden Rubinshtein; Esther Mendelsohn

**Subject:** תביעה חדשה בארה"ב - גזהאן נ' גרויסמן ואח

**Importance:** High

ימית ואדי שלום וברכה,

אבקש לעדכנכם אודות תביעה נזיקית חדשה שהוגשה בתאריך 13.3.2020 בפלורידה, ארה"ב.

#### רקע:

התביעה הוגשה כנגד 12 נתבעים, ביניהם חמישה נתבעים אמריקאיים: גב' ג'ודית גרויסמן - ראש ארגון ויצ"ו ארה"ב, הארגון עצמו (ויצ"ו ארה"ב) וכן שלושה פילנטרופים. כמו כן, התביעה הוגשה גם כנגד **שבעה נתבעים ישראליים**, ביניהם חמישה שופטי בית המשפט העליון בישראל: נשיאת בית המשפט העליון, כבוד השופטת אסתר חיות, וכבוד השופטים נועם סולברג, עוזי פוגלמן, יצחק עמית וג'ורג' קרא. כן הוגשה התביעה כנגד גב' יפעת מויאל, עובדת סוציאלית וגב' רנה תכלת, מנהלת המחלקה לקשרים בין-לאומיים במשרד הרווחה.

התובע הינו מר בנימין גזהאן, ממוצא אתיופי אוונגליסטי, הטוען, לדבריו, למעמד "פליט בלתי מוכר" (unrecognized refugee). על פי כתב התביעה, מר גזהאן ברח למצרים ומשם לישראל ב-2018, ומתגורר מאז בירושלים עם אשתו (לדבריו, בעלת מעמד של פליטה אריתראית) ושבעת ילדיו. לדברי גזהאן, חמישה מילדיו נלקחו ממנו למוסדות רווחה המנוהלים על ידי ארגון ויצ"ו, באופן המסכן את ילדיו.

לטענת התובע, ב-5.2.2020 הגיש יחדיו עם אשתו עתירה לבית המשפט העליון לצו "הביאס קורפוס" עבור הילדים לצורך שחרורם ממשמורת המדינה לחיק המשפחה, על מנת שיוכלו לעזוב את ישראל. על פי כתב התביעה, ב-9.2.2020 כב' השופט סולברג דחה את עתירתו של האב בפסק דין קצר וללא נימוק, אשר לא התייחס לסטטוס הילדים כילדים של פליטים (פס' 75-76 לכתב התביעה).

#### עילות התביעה המרכזיות המופיעות בכתב התביעה הינן:

. common law detention – לטענת התובע, ארגון ויצ"ו וגב' שוסטרמן (אחת הפילונטרופיות הנתבעות), בסיוע הנתבעים האחרים, הרחיקו את חמשת הילדים מהאב, ושלחו אותם לשהות במוסדות, בהם קיבלו כנגד רצונם סמים פסיכותרופיים, הותקפו מינית, הוכו, חוו מצוקה חמורה, ועוד.  
. Common law intentional infliction of emotional distress . גרימה בכוונה תחילת למצוקה רגשית (Common law intentional infliction of emotional distress).

. שידול כוזב (False Solicitations) והונאה - לטענת התובע, נתבעים 1-5 (ארגון ויצ"ו והפילנתרופים) הפיצו מידע כוזב על מנת לשדל תורמים בארה"ב (בייחוד בפלורידה) לתרום כספים אשר שימשו למטרות רווח של מוסדות הרווחה.

הטענות העיקריות המועלות כנגד נתבעים 8-12, נשיאת ושופטי בית המשפט העליון:

לטענת התובע, שופטי בית המשפט העליון, באופן שיטתי, דחו בקשות של הורים וערעורים שהוגשו על מנת להציל את הילדים מהמוסדות וסייעו במיצוב המעמד של עובדי הרווחה באופן שלא ניתן לפקפק בהחלטותיהם. זאת עשו תוך התעלמות שיטתית מזכויות אדם והזכות להליך הוגן, שילוב תיאוריות דמו-נאציות במערכת הרווחה הישראלית, ומתן אפשרות לנתבעות האחרות לסחור בילדי פליטים, כדוגמת ילדיו של התובע (פס' 42-46 לכתב התביעה).

התובע מתייחס ספציפית לפסיקה של כב' השופט עמית, שבה לטענתו קבע תקדים כלפי הורים, לפיו בבתי משפט הרלבנטיים, לא תהיה להורה זכות לחקירה נגדית של העובדת הסוציאלית בתיק, או לזמן עדים שיעידו לטובתו, ובכך לא ניתן בפועל לערער על החלטת העובד הסוציאלי. בכך, נטען כי כב' השופט עמית הפך למעשה את בתי המשפט הללו ל"חותמת גומי" של העובדים הסוציאליים (פס' 47 לכתב התביעה).

עוד טען התובע, כי כב' השופטים עמית, סולברג וקרא, בכוונה ובידיעה התעלמו מזכויות ילדים לפי המשפט הבין-לאומי ואישרו באופן חוזר ושיטתי לנתבעים הישראלים האחרים לסחור בילדים (פס' 48 לכתב התביעה).

יוער, כי התובע משלב בכתב התביעה גם התייחסות לכב' השופט (בדימוס) פיליפ מרקוס (פס' 86-88 לכתב התביעה) וכן לכב' השופטת (בדימוס) חנה בן עמי, ביחס לדברים שמסרה, לטענתו, בראיון שקיימה (פס' 89 לכתב התביעה).

הטענות העיקריות המועלות כנגד נתבעות 6 ו-7, גב' יפעת מויאל וגב' רנה תכלת (ראו למשל פסקאות 38-41, 105 ו-144 לכתב התביעה):

לטענת התובע, גב' מויאל הוציאה צו אדמניסטרטיבי להוצאת ילדי התובע מביתם. עוד נטען כי גב' מויאל וגב' תכלת הגישו דו"חות משטרה שקריים כנגד האב. כמו כן, נטען כי הן דיווחו על התובע לרשויות ההגירה, על מנת להוביל לגירושו, בכדי שיוכלו להמשיך ולהחזיק בילדיו עד לגיל 18, דבר שיוביל להטבות כספיות.

ביחס לגב' תכלת, נטען כי היא נוסעת ברחבי העולם במטרה לשדל קרנות למען "תהליך חטיפת הילדים בישראל" וכן שנסעה לאו"ם בג'נבה במטרה להגן על מדינת ישראל מפני האשמות באופן טיפולה באוכלוסיית הפליטים ומבקשי המקלט בישראל, ובהקשרים אלו שיקרה לאו"ם.

#### **בין הסעדים המבוקשים בכתב התביעה, התבקשו הסעדים הבאים:**

. סעד הצהרתי כי הנתבעים (כולל מערכת המשפט הישראלית ומערכת הרווחה הישראלית) הינם בגדר ארגון פשיעה לפי הגדרת - Racketeer Influenced and Corrupt Organizations Act (להלן: RICO);

. סעד הצהרתי כי השופטים מסייעים לביצוע עבירות ארגון פשיעה בתפיסה, מעצר וסחר בילדים; . הכרה בכל ה"כספים שהושגו בצורה רעה" (ill-gotten monies) ב-10 השנים האחרונות והחזרתם לתורמים;

. פיצויים נזיקיים בשווי \$2,000,000;

. פיצויים עונשיים;

. צו מניעה שיאסור על ארגון ויצ"ו והפילנתרופים לגייס כספים בשטחי ארה"ב למטרות טיפול ודאגה לילדים וכיו"ב בישראל;



אשמח שנקבע לשוחח בתחילת שבוע הבא בנושא. זאת, שכן נעשה למיטב הבנתנו כבר נסיון המצאה של כתב התביעה.

בברכה,

מרלין

מרלין מזל, עו"ד

ראש אשכול הליכים במדינות זרות במחלקה למשפט בין-לאומי | ייעוץ וחקיקה

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