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Date: January 5, 2015  
In your response please note: 85761

To:  
Captain Eliran Sasson  
Public Liaison Officer  
Civil Administration

**By Fax: 02-9977341**

**URGENT!**

Dear Sir,

Re: **Appeal against the decision to deny the application for the renewal of the "entry permit into the seam zone" for farming purposes**  
**Mr. \_\_\_\_\_ Bari, ID No. \_\_\_\_\_**

1. Mr. Bari, whose details are specified above, is the owner of agricultural lands located in the Kalkilia region, west to the separation wall.
2. On January 11, 2014, Mr. Bari submitted to the Palestinian liaison office an application for an "entry permit into the seam zone" for the purpose of farming his lands.
3. On November 25, 2014, Mr. Bari was informed orally by the Palestinian liaison officers that his application was denied due to "Israel Security Agency (ISA) preclusion" which was fed against him. Said notice which was given orally, did not include, naturally, an open paraphrase concerning the grounds for the denial, contrary to section 16(b)(2) of chapter A to the "2014 Standing Orders for the Seam Zone".
4. In view of the above and according to the procedures published in the "2014 Standing Orders for the Seam Zone", pursuant to which an appeal may be submitted to the appellate committee if an applicant's application was denied for security reasons, we request to **immediately receive** an open paraphrase in response to Mr. Bari's application for permit, and to have an appellate committee convened in his matter.

Enclosed: Land registration document – marked A  
Inheritance Order – marked B  
Power of Attorney – marked C  
Irrevocable Powers of Attorney – marked D and E  
Copy of identification card – marked F

5. We further request, in preparation for the committee's hearing, to receive all relevant material – in addition to the open paraphrase – for the purpose of having an efficient and pertinent hearing, as held by the Supreme Court (AAA1038/08 **State of Israel v. Ghabit**). In addition, after a decision is made in the appeal, we request to receive it in writing, as well as the complete protocol of the committee.



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6. It should be emphasized that the procedures which were published in the "2014 Standing Orders for the Seam Zone" state that "as a general rule, in the event of a security denial a hearing will be held" and "**the applicant will be summoned to the hearing within three weeks from the date of the decision to summon him**".
7. I thank you for your prompt and efficient attention to this matter as well as for your written response.

Respectfully,

Omri Metzger  
Client Advocacy

Enclosures:  
Marked A-F

Copies:  
Colonel Doron Ben-Barak, Legal Advisor for the West Bank Area  
Major Amos Zuaretz, Head of Crossings and Seam Zone Department