Date: January 10, 2016
In your response please note: 90902

To
Mrs. Liat Melamed
Head of Status and Visas Branch
Population and Immigration Office
49 Wadi al-Joz
East Jerusalem

Personal delivery

Dear Madam,

Re: **Arguments in writing against the notice of an intention to deny a family unification application in the name of Mr. _____ Hatib, ID No. _____**
For his spouse Mrs. _____ Hatib, ID No. _____
Family Unification Application 591/99
Notice dated November 27, 2015
Your letter dated December 23, 2015

1. The Hatib family authorized and empowered the legal counsels of HaMoked: Center for the Defence of the Individual (hereinafter: **HaMoked**) to represent it in the above matter *vis-à-vis* the Israeli authorities.

2. On December 23, 2015, we received your letter inviting the Hatib spouses to submit their written and oral arguments against your notice (hereinafter: the **notice**) of the intention to deny their family unification application, notice which had been received by them by mail on November 27, 2015, which stated as follows:

> 3. This is to notify you that in view of the information received from security agencies, we consider to deny the above captioned family unification application for the following reasons:
>
> 4. Your son _____ Hatib, carried out on October 12, 2015, a stabbing attack near the Lion's Gate in Jerusalem, in which he stabbed a Border Guard combatant, who, miraculously, was only lightly injured by the perpetrator's knife. Several policemen who were nearby shot and neutralized the perpetrator, your son, who was killed in the takeover.

5. With respect to said notice and along the oral arguments, we hereby respectfully submit our written arguments.

6. The notice is attached hereto and marked **A**.

My Client's Case

7. My client is a permanent resident in the state of Israel, who has been living for a while as will be immediately specified below, with his spouse and their children in Wadi al-Jos neighborhood in Jerusalem.

8. By the end of 1996 my client entered into a marriage contract with Mrs. _____ _____, a resident of the Area who was born in Jerusalem, and in 1997 my clients got married.

9. Copies of my client's birth certificate and marriage contract are attached hereto and marked, respectively, **B-C**.

10. In the years following their marriage and until 2002, the Hatib family lived in a rented apartment in Sur Bahir neighborhood in Jerusalem. From 2002 through 2015 the family lived in rented apartments in Jabel Mukaber neighborhood. However, following the incident in which their son _____ was killed, the incident due to which notice was given to my client of your intention to deny their family unification application, the family had to leave the rented apartment in which it lived until that time, and moved to an apartment in Wadi al-Joz neighborhood which was rented by the UN organization – UNDP – and sublet by it to my client who has been employed by the organization for the last few years.

11. Copies of the current rental agreement for the apartment in which the Hatib family lives and a certificate attesting to my client's employment with the UN organization –UNDP – are attached hereto and marked, respectively, **D-E**.

12. Over the years my client and his spouse had three children: _____ born on March 28, 1998, _____ born on November 16, 2004 (**who is currently 12 years old**) and their daughter _____ born on December 26, 2006 (who is currently nine years old). My clients' children were born in Jerusalem and were registered after their birth as permanent residents in Israel.

13. A copy of my client's ID attachment in which his children are registered and their birth certificates is attached hereto and marked **F**.

14. It should also be emphasized that the center of life of the Hatib family is located, in all respects, in Jerusalem: the family resides in the city and my client who is employed by the UN organization as aforesaid provides for it, the children who were all born in Jerusalem are raised therein and attend educational institutions in Jerusalem and my client and his children are also recognized as permanent residents in Israel by the National Insurance Institute.

15. Copies of documents attesting to the fact that the center of life of my clients' family is in Jerusalem are attached hereto and marked **G**.

16. On December 12, 1999, my client submitted to the Population and Immigration Authority a family unification application together with his wife. Since, as aforesaid, there is no dispute that the center of life of the Hatib family is in Jerusalem, and since no criminal or security preclusion was found in their case, the application was approved in

2001. Ever since, Mrs. Hatib has been receiving renewable stay permits in Israel regularly.

17. Copies of a receipt for the submission of a family unification application and its approval and a list of approvals and DCO permits for the vast majority of the period in which Mrs. Hatib resides in Israel are attached and marked **H**.

The attack and the notice which was thereafter sent to my clients

18. On October 12, 2015, my clients' seventeen years old son, _____, carried out an unsuccessful stabbing attack near the Lion's Gate in Jerusalem. It should be emphasized that his parents, who are normative people, were extremely upset since their son's death due to the mere death of their son and in view of the tragic circumstances of his death. It should also be emphasized that my clients had nothing to do with their son's actions nor did they have any prior knowledge of their son's intentions to carry out an attack, to the extent he had any such prior intentions. Finally, it should be noted that other than an initial interrogation which my clients underwent after they have contacted Israel police at their own initiative following rumors which reached their ears that their seventeen years old son might have been involved in an attack, they were not interrogated by the security agencies, which also ostensibly attests to the fact that they were not involved and had no knowledge of the regretful incident in which their son was involved.

19. Moreover. Your above captioned notice fails to specify any reason which can justify your intention to deny my clients' application, other than the fact that they are the parents of a minor who carried out, at his own initiative and without his parents' knowledge, an unsuccessful attack. It should also be emphasized that the notice does not state that any criminal or security preclusion has suddenly arisen with respect to my clients, that the family's center of life is suddenly no longer in Jerusalem and that doubts have suddenly arisen as to the sincerity of my clients' marriage. For all of the above reasons this written argument is hereby submitted.

The notice is not valid

20. As specified below, the above captioned notice does not reconcile with the law, case law and current administrative procedures concerning denial for security reasons. In addition it will be argued that under the circumstances of my clients described above, it is an intention to make an unreasonable and disproportionate decision given contrary to the principle of the child's best interest while severely violating my clients' right to family life. In addition it will be argued that the notice is based on extraneous considerations, since its entire purpose is to penalize and harm the innocent who were neither involved in the incident nor had any prior knowledge of the execution of the acts attributed to their son. We are therefore concerned with collective punishment directed at innocent people for vindictive reasons only. We shall discuss things in an orderly manner.

21. **The notice does not reconcile with the Temporary Order**

22. Your above captioned notice does not reconcile with the provisions of the Citizenship and Entry into Israel (Temporary Order) Law, 5763-2003 (hereinafter: the **Temporary Order**).

23. Paragraph 3D of the Temporary Order stipulates that:

> A permit to stay in Israel or a license to reside in Israel shall not be granted to a resident of the region, in accordance with sections 3, 3A1, 3A(2), 3B(2) and (3) and 4(2) and license to reside in Israel shall not be granted to any other applicant who is not a resident of the region, **if the Minister of the Interior** or region commander, as the case may be, **has determined**, pursuant to the opinion of authorized security personnel **that the resident of the region or other applicant or family member are liable to constitute a security risk to the State of Israel**; in this section, "family member" – spouse, parent, child, brother and sister and their spouses. In this case, the Minister of the Interior may determine that a resident of the region or any other applicant is liable to constitute a security risk to the State of Israel, among other things on the basis of an opinion by the security personnel in terms of which within the domiciled state or residential region of the resident of the region or of any other applicant, activity was carried out which is liable to endanger the security of the State of Israel or of its citizens.
>
> (Emphasis added, B.A.)

24. As Aforesaid, in my clients' case there is no dispute that they did nothing wrong. It ha not been argued, neither by Israel Police nor by the Israel Security Agency (ISA) or the Population Authority that my clients were involved in any way or manner whatsoever in their son's deed, or that they had prior knowledge of their son's intention to execute his deed – to the extent he had any prior intentions of this kind. My clients' son, with respect of whom a security preclusion could have ostensibly been raised against his parents according to section 3D of the Temporary Order, is no longer alive.

25. Hence, and since evidently, the basic reasons required for the substantiation and justification of the security preclusion do not exist in my clients' case, namely: the finding that a resident of the Area or other applicant or family member are liable to constitute a security risk to the State of Israel, the intention to deny my clients' application for the reasons specified therein, does not reconcile with the provisions of the Temporary Order.

The notice does not reconcile with the provisions of the procedure on "Security Agencies Comments"

26. Furthermore, your notice does not reconcile with the Population Authority's procedure number 5.2.2015 captioned "Procedure on Security Agencies Comments regarding status applications in Israel by virtue of spousal relations with an Israeli" (hereinafter: the **procedure**), in view of the fact that the basic conditions required for a denial of an application as stipulated in sections 3.3-3.4 of the procedure are not satisfied in my clients' case. These sections which were designated by the Population Authority for cases such as the case at hand, namely: cases in which an intention to deny an application for criminal or security reasons arises during the graduated procedure, do not include an express provision enabling to punish a family member only due to his kinship with a person who is no longer alive, and obviously does no longer pose any security risk. The following are the relevant sections of the procedure:

> **3.3 During the graduated procedure – reasons related to the sponsored (foreign) spouse**
>
> … 3.3.2 **Police File:**

As a general rule, when police files which were opened during the graduated procedure are pending against the sponsored spouse, the application shall be transferred to the head of the desk, for her decision, who shall exercise a case-specific discretion according to the type of the offense, its severity, the severity of its consequences, the number of offenses with respect of which files were opened, etc. Once a decision is made, the head of the desk shall send the applicant a reasoned and detailed letter.

3.3.3 **Intelligence Information**

As a general rule, when the agencies have intelligence information regarding the involvement of the sponsored spouse, the application shall be transferred to the head of the desk, for her decision, who shall exercise a case-specific discretion according to the scope of the involvement, its severity, etc. Once a decision is made, the head of the desk shall send the applicant a reasoned and detailed letter.

3.4 **During the graduated procedure – reasons related to the Israeli spouse**

3.4.1 When the applicant, during the graduated procedure, is detained/arrested and/or a file is pending against him in which a long incarceration sentence is expected to be imposed on the applicant or if he is held in remand until end of proceeding, the application shall be transferred to the head of the desk, for her decision, who shall exercise a case-specific discretion according to the circumstances. The fact of the detention/arrest will be taken into consideration, and among other things the following shall be considered: the period of time which passed from the approval of the application, minors' custody, the connection to Israel, center of life in Israel and absence of additional criminal or security preclusion for denying the application etc.

27. Therefore, your above notice, according to which you intend to punish my clients for their seventeen years old son's deed, a deed with respect of which no allegation of my clients' involvement therein was made, not only fails to reconcile with the provisions of the Temporary Order, but also fails to reconcile with the procedure.

The intention to deny is based on extraneous considerations

28. My clients' family is therefore being punished by you for the deed of another person, for mere vindictive purposes and for all to see and beware.

29. This case concerns considerations which are extraneous to the family unification procedure, since it is obvious that a pure consideration of the considerations which are relevant to the family unification procedure would have necessarily led to the inevitable conclusion that despite the issue of their son, and particularly in view of the fact that he is no longer alive, my clients' family application should be approved.

30. With respect to the relevance of the fact that extraneous considerations were considered, case law's position is clear. More than three decades ago Justice I. Cohen has already held that while examining the acts of the authority one must examine "whether the extraneous consideration or the improper purpose had a real impact on the act of the

authority, and if this was the case, the act of the authority should be invalidated." (HCJ 392/72 **Emma Berger v. The District Planning and Building Committee,** IsrSC 27(2), 764, 773).

31. Therefore, and in view of the fact that as shown, the considerations underlying the intention to deny my clients' application are considerations of vengeance, punishment and deterrence, we are concerned with an unlawful consideration of extraneous considerations. The Supreme Court elaborated on this issue in a case which concerned the assignment of a person's residence in an occupied territory.

> 32. It follows that the basis for exercising the discretion for assigning residence is the consideration of preventing a danger presented by a person whose place of residence is being assigned. **The place of residence of an innocent person who does not present any danger may not be assigned, merely because assigning his place of residence will deter others**. Likewise, one may not assign the place of residence of a person who is not innocent and did carry out acts that harmed security, when in the circumstances of the case he no longer presents any danger. Therefore, if someone carried out terrorist acts, and assigning his residence will reduce the danger that he presents, it is possible to assign his place of residence. **One may not assign the place of residence of an innocent family member who did not collaborate with another**, or of a family member who is not innocent but does not present a danger to the area. This is the case even if assigning the place of residence of a family member may deter other terrorists from carrying out acts of terror. (HCJ 7015/02 **Ajuri et al., v. Commander f IDF Forces in the West Bank et al..** TakSC 2002(3), 1021, page 1029)(Emphases added, B.A.).

33. The denial of my clients' family unification application under the above described circumstances is nothing but collective punishment contrary to one of the most fundamental rules of justice – the prohibition against penalizing a person for acts committed by another person. Any jurisprudence is based on this rule which rule is also well rooted in our heritage. This concept is expressly manifested in the book of Deuteronomy :

> Fathers shall not be put to death because of their sons, and sons shall not be put to death because of their fathers; a person shall be put to death for his own wrongdoing. (Deuteronomy 24, 16).

The prophets Yirmiyahu and Yechezkel also reiterate the rule that one family member should not be punished for the sins of another family member:

> The soul that sins, it shall die; a son shall not bear the iniquity of the father, and **a father shall not bear the iniquity of the son**; the righteousness of the righteous shall be upon himself, and the wickedness of the wicked shall be upon himself. (Yechezkel 18, 20). (Emphasis added, B.A.).

34. The harsh implication of your intention to deny the family unification application on the life of the entire family of my client is clear. With a single stroke of the pen Mrs. Hatib, a wife and mother of two minor children in the ages of 9 and 12 respectively, who has been legally residing in Israel for many years, is doomed to – expulsion. Consequently,

from its receipt of the notice the family experiences deep anxiety and constant stress accompanying the uncertainty surrounding the status of the mother of the family. It is clear that your notice also severely affects the my clients' minor children, whose personal security and fear that their mother would be expelled from their home, harms them in the most serious and severe manner.

35. Your intention to deny the application is much more severe in view of the fact that this case concerns a woman who lived in Israel lawfully and continuously for so many years, while undergoing a family unification procedure and obtaining stay permits in Israel. During this period my clients' children were borne, who are permanent Israeli residents. The family lives here. The children attend school here, my client earns a living for his family here, and their entire life is run here. The center of the family's life is therefore, in all possible respects – in Jerusalem. The immediate effect of the implementation of the intent and the grant of a final decision denying their application is the uprooting of my client from Israel and tearing her apart from her spouse and children, and alternatively, the entire family will exile with her, against its will, from its hometown, Jerusalem.

The violation of the right to family life and the failure to comply with the demand to proportionate infringement

> A person's right to have a family is one of the foundations of human existence; its realization is a condition for making the most out of life and it is the essence of life; it is a condition for self-realization and for a person's ability to share his life and fate with his spouse and children. It reflects the essence of a person's being and the embodiment of his desires. The right to have a family is situated at the highest level of human rights. An infringement on this right is possible only when it is balanced against a conflicting value of special power and importance. **In the existing tension between the value of security of life and other human rights, including the right to have a family, the security consideration prevails only where there is high probability, almost reaching certainty, that if appropriate measures involving the infringement of human rights are not taken, public safety may be materially injured**.
>
> (HCJ 7444/03 **Dakah v. Minister of the Interior**, paragraph 15 of the judgment of the Honorable Justice Procaccia, reported in Nevo, February 22, 2010 (hereinafter: **Dakah**)
>
> (Emphasis added, B.A.)

36. Affording the right to family life the status of a constitutional right entails the assertion that any violation of said right must be made according to the Basic Law: Human Dignity and Liberty – and only for weighty considerations. All of the above based on solid evidentiary infrastructure attesting to the fact that such considerations were taken into account. This assertion imposes on the Population Authority a heavier obligation, to strictly maintain an administrative system ascertaining that its power to deny family unification applications submitted to it, a power which violates the right to a protected constitutional right, is exercised only when it is full justified.

37. The **Entry into Israel Law** and the **Temporary Order** enable the Minister of the Interior to exercise broad discretion when family unification applications are concerned, and when the sponsored spouse in the family unification application poses a security risk, the application may be denied.

38. However, like any limitation on a fundamental right, a decision to deny a family unification application must be made according to the rules of reasonableness and proportionality and proper weight should be given to the fundamental right which was violated.

39. Violation of human rights, and in the case at hand the right to family life, is lawful only if it satisfies the tests of reasonableness and proper balancing between the violated right and other interests that the authority should protect. The more important and substantial the violated right, the greater the weight given to it in the framework of the balancing between said right and the opposing interests of the authority (AA 4463/94, LHCJA 4409/94 **Golan v. Israel Prison Service**, IsrSC 50(4) 136, 156.

40. The required weight of the evidence on which the administration decision is based depends on the nature of the decision. The weight of the evidence should reflect the importance of the right or interests which were harmed by the decision and the severity of the harm caused. The fact that respondent's decision violates appellants' fundamental rights, obligates the respondent to substantiate its decision on weighty valuations and data (see EA 2/84 **Neiman v. Central Elections Committee**, IsrSC 39(2) 225, 249-250).

41. Relevant to this case are the words of the Honorable retired President, Justice Beinisch, in **Dakah**:

> I will add further, that even if according to the majority opinion in the judgment of this court in Adalah, the general infrastructure underlying the relevant sections does not attest to an inherent constitutional difficulty, yet – and my collegue has broadly discussed this issue – one cannot disregard the fact that each decision not to allow the presence in Israel of a foreign spouse of an Israeli, severely violates the constitutional right to family life, as broadly discussed and established in Adalah (and see for instance: paragraphs 6-7 of my judgment), and as such requires a careful examination of each such decision. In this context it was held in Amara, and this is also relevant to our case, that the Minister of the Interior must exercise his discretion according to the provisions of section 3D "according to the basic principles of Israeli administrative law. He must exercise powers which enable the violation of fundamental constitutional rights according to the criteria established in the limitation clause of the Basic Laws concerning human rights… **a determination made by the Minister of the Interior under section 3D must therefore satisfy the proportionality requirement**."
>
> **Thus, for instance, a decision not to extend a residency permit which was granted in the past due to a security preclusion which arises from a close family member of the applicant will satisfy the proportionally tests, if the Minister of the Interior fulfilled his obligation to conduct a thorough and rigorous examination of the entire administrative evidence presented to him, based on which he wishes to define the scope and extent of the potential risk posed by the foreigner for whom the status is requested, and <u>prove</u> by significant administrative evidence that a security threat is indeed posed by the status applicant because of the threat posed by his family member** (and see also, paragraph 17 in

Amara). In this context, I adopt the words of my colleague in paragraph 41 of her judgment concerning the gamut of the considerations which should be taken into account in the assessment of the risk posed by the applicant, and concerning the appropriate weight which should be attributed, in the assessment of severity of the risk, to security information regarding a direct security risk posed by the applicant as opposed to security information concerning an indirect risk posed by him, because of his family members.

The specific expectation for the realization of the right to a family where a family unification permit had been granted in the past and its renewal is requested, is not similar in force to the expectation for a permit when such permit has not been granted in the past.

And also:

it is obvious that the expectation of spouses for the renewal of a residency permit, where they had been granted a family unification permit in the past, is very powerful. This power is greater than the power of the expectation of spouses who have not yet been granted a unification permit in the past, and whose family unification application has not yet been decided prior to the effective date. In addition, with respect to a family the unification of which had been permitted in the past, a difference may exist between the power of the expectation of a family which has been residing in Israel for many years and laid down roots in Israel, which has a number of children who are raised and educated in Israel, and a young couple who has just received a unification permit, who has been living in Israel for a short period of time, who has not yet established a complete family unit and who has not yet integrated into the Israeli labor market and society.

…**the weightier the expectation for family unification in view of the specific circumstances of the case, the stronger the security interest must be to justify a violation of such expectation**.

(paragraph 24 of the judgement of the Honorable Justice Procaccia)

(Emphases added, B.A.)

42. And in paragraph 33 of the judgement of the Honorable Justice A. Procaccia:

As a result of the competent authority's refusal to grant **or renew the validity of a residency permit** in Israel to spouses under the transitional provisions of the Temporary Order Law within the framework of a family unification procedure - the Israeli family members – **the spouse and the Israeli minor children** – are deprived of their right to maintain joint family life in Israel. […] In view of the above, the manner by which the authority is exercised is conditioned upon the satisfaction of constitutional tests. The key question is whether the manner by which the authority is exercised under the Temporary Order Law, and which involves a violation of the fundamental right to a family for the purpose of realizing a security need. […]

> For this purpose proportionality must be examined according to the sub-tests which were developed by case law. **The rational connection test, the least injurious means test, and the proportionality test in the narrow sense - are the leading tests for the purpose of determining the proportionality of the violation of the constitutional right**. […]
>
> **… an appropriate link is required between the measure taken to prevent family unification and the purpose of securing state security and public safety; it is required that the security objective cannot be achieved by another least injurious means; and finally, it is required that a proper proportion exists between the nature of the violation of the right to a family and of the right to equality according to its strength, and the security advantage gained as a result of the denial of the requested unification** (**Amara**, paragraph 11 of the President Barak's judgment)
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> (Emphases added. B.A.)

43. It should be noted that the clear distinction drawn by the court in **Dakah** between a refusal to grant a license and the revocation or refusal to renew an existing license is not new and is well rooted in case law for years.

Accordingly, *inter alia*, it was held in HCJ 113/52 **Zachs v. Minister of Commerce and Industry** by the Honorable Justice Vitkon:

> Revoking a license which had already been issued cannot be compared with granting a new license. As far as a new license is concerned, case law provides that a substantiated suspicion – usually – can also establish a sufficient reason for a refusal to grant a license. However, when the revocation of an already issued license is concerned, we are of the opinion that once a license is granted, it should not be revoked based on mere suspicions without an inquiry, in which the involved person should be given the opportunity to take part and present his arguments.
>
> On this issue ass also HCJ 799/80 **Shlalam v. Licensing officer according to the Firearms Law**, IsrSC 36(1) 317, 327 and also Daphna Barak Erez, **Protecting Expectation in Administrative Law**, *Iyunei Mishpat* 17, 209, 242.

44. Hence, when it uses its power to revoke an existing permit, the authority must base its decision on solid evidence and be very meticulous about it. Relevant to this issue are the words of the Honorable Justice Rivlin in HCJ 1712/00 **Urbanovitch v. Ministry of Interior**, IsrSC 58(2) 951, 957:

> In this context, the authority must be very meticulous, due to the substantial implications of the decision on the appellants. Indeed, trivial evidence will not suffice to revoke visas which were granted or citizenship which was given (see HCJ 3615/98 **Nimushin v. Ministry of the Interior**, TakSC 2916(3) 2000).
> (*Ibid*., Emphases added, B.A.)

45. Hence, in view of the above judgments and particularly the court's holdings in **Dakah**, and in view of the circumstances of my clients and mainly, as specified above, the fact that they had no involvement, knowledge or influence on their son's actions, your notice of the intention to deny their application for the reasons specified therein does not satisfy the required administrative standards. Therefore, and since the notice intends to prejudice a fundamental right, the right of my clients and their minor children to family life, the defect is fundamental and the notice is not valid.

Violation of the child's best interest

46. According to the principle of the child's best interest, in all acts taken with respect to children, either by the courts, administrative authorities or legislative bodies, the child's best interest must be the most important consideration. In Israeli jurisprudence the principle of the child's best interest is a fundamental and well rooted principle. Accordingly, for instance, in HCJ 2266/93 **A v. A**, IsrSC 49(1) 221, it was held by Justice Shamgar that the state must interfere to protect a child against a violation of his rights. Moreover, the principle of the child's best interest was recognized in many judgments as a governing principle whenever balancing of rights should be made. As stated in CA 549/75 **A v. The Attorney General**, IsrSC 30)1) 459 pages 465-466: "There is no judicial matter pertaining to minors, in which the minors' welfare is not the primary and main consideration."

47. In international law the principle of the child's best interest also enjoys the status of a superior-principle. This is manifested, inter alia, in the establishment of **The Convention on the Rights of the Child** (Treaties 31, 221). The convention which was ratified by the state of Israel on August 4, 1991, includes a host of provisions imposing an obligation to protect the family unit of the child. (see: Preamble to the convention and Articles 3(1) and 9(1) thereof). In particular, Article 3 of the convention provides that the best interests of the child shall be a primary consideration in any governmental act. This leads to the conclusion that any enactment or policy should be interpreted in a manner which enables to protect the rights of the child.

48. From the general to the particular. Your notice of the intention to deny my clients' application while critically violating their right to family life, without any justification and completely contrary to the Temporary Order, case law and procedure, also constitutes, in addition to all of the above, an extreme violation of your obligation, being an administrative authority, to be guided by the principle of the child's best interest. My clients have two minor children in the ages of 9 and 12, respectively. The denial of my clients' application also necessarily entails the infliction of a severe harm on children who did nothing wrong, children who from their birth live and grow-up in Jerusalem with my clients, their family members, friends and acquaintances. Harm to children attending the city's schools and that Jerusalem is their natural and sole habitat. In addition, such a decision may also put at risk the status of the family's children as permanent Israeli residents since should they fail to return to Israel within seven years from the date they turn 18 years old, they will lose their status in Israel, with all ensuing consequences.

Conclusion

49. In view of the entire arguments and circumstances described above, we request that you retract your notice of the intention to deny my clients' family unification application, so that my client, his wife and minor children who did nothing wrong will be able to continue to live in their hometown.

Sincerely,

Benjamin Agsteribbe, Advocate