



December 23, 2021

MK Mickey Levy  
Speaker of the Knesset

Re: **MK Dudu Amsalem's letter dated December 22, 2021 regarding "Making false misrepresentation to members of the Knesset under the guise of a background document on the management and operation of the holy sites."**

Dear Mr Speaker,

Firstly, I would like to point out that the letter in question came to my attention via the media rather than directly from MK Amsalem, as is customary in such cases.

Nevertheless, with your permission I would like to address the claims made in this letter.

1. Jewish Pluralism Watch is a civic monitoring organization which tracks Israeli elected officials' positions, statements, bill proposals, and votes regarding issues of religion and state. JPW also runs educational programs promoting civic activism.
2. Jewish Pluralism Watch was established in 2013 in view of the gap between public opinions on issues of state and religion and government policy in the area of the relationship between state and religion. This policy does not reflect the changes that have taken place in Israeli society in the last twenty years. Some elected officials have no clear position on matters of state and religion and others have firm views which are largely unknown. In both cases the general public has no effective tools to monitor the positions and voting record of their elected officials.
3. **Jerusalem Pluralism Watch serves Israeli democracy:** A robust democracy is contingent upon accountability and transparency between citizens and their elected officials. The JPW helps to realize these values through an online information center that provides the public with details regarding the ideological positions, parliamentary initiatives and public statements of Knesset members as well as a record of their votes on issues of state and religion.



4. The document in question was submitted to the Committee on Special National Infrastructure Initiatives and Jewish Religious Services as part of the background material submitted to the committee by various sources, among them civil society organizations. Material for the discussion was also submitted by Betzalmo and Am Echad (One Nation) (both organizations affiliated with the Jewish Orthodox stream). Additional material was submitted by the Research and Information Centre of the Knesset at the request of MK Moshe Abutbul regarding the accessibility of religious sites and graves of the righteous.
5. With regard to MK Amsalem's claims, given that the government decided to separate the administration of the Western Wall from that of the other holy places, the fact that there is only one supervisor for both these bodies undermines the principles of good governance. This only serves to emphasize with greater clarity our claim that it is unclear to whom the Supervisor of the Wall is subordinate – the Prime Minister's Office, the Minister for Religious Affairs or the Chief Rabbis as was suggested in the discussion.
6. Regarding the definition of the role of supervisor – MK Amsalem is correct albeit only partially. The Protection of Holy Places Law and the accompanying regulations define the role and its authority. However, **the position of Rabbi of the Wall is not found in this legislation nor in any other legislation.** This position was added by the Supervisor of the Holy Places and is not included in the definition of the statutory role.
7. The discussion regarding the exemption of the supervisor's tenure from the government decision 2464 was brief and unsatisfactory. Furthermore, the possibility of legislation on limiting the supervisor's term also arose in the discussion. Essentially, **a public servant who has served for quarter of a century is an anomaly in a democracy**, regardless of who holds this position. It should be noted that we are currently awaiting the Attorney General's reply regarding the request for freedom of information and his comprehensive standpoint concerning this matter.
8. All the articles cited in the document contain a referral to the full article where responses from the Supervisor of the Holy Places and the Western Wall Heritage Foundation can be found.



9. The other claims raised in our document and which focus on promoting transparency and good governance in the administration of the Jewish people's holiest site – are not mentioned in MK Amsalem's letter, suggesting that he too finds them credible.
10. Sir, as the Chair of the committee pointed out in the debate on December 13, 2021, the fact that the Supervisor of the Holy Places serves in a number of capacities, some of which create – by definition – a conflict of interest and involve the use of public funds, together with the Director of the National Center for the Protection of Holy Places' observation that the relationship between the Center and the Supervisor and between the Director of the Center and the Supervisor – is undefined, unclear and revolves mainly around fundraising – all this raises many questions and warrants investigation.
11. As an important member of a government founded on fighting corruption and promoting good governance and transparency – we believe that there is no need to explain to you the need to urgently redress the current situation.
12. Attached for your convenience is the document that was submitted to the committee.
13. I am available for any questions or clarifications.

Yours sincerely,

Sharon Banyan-Primor, Attorney  
Director, Jerusalem Pluralism Watch

**Copies**

Attorney Sagit Afik – Attorney General of the Knesset  
Mk Yulia Malinovsky – Chair, Committee for Special National Infrastructure Initiatives and Jewish Religious Services  
MK Matan Kahana – Minister of Religious Services  
Ms. Carmit Yulis – Deputy Attorney General of the Knesset  
Mr. Shmuel Rabinovitch – Supervisor of the Holy Places  
Rabbi Yosef Schwinger – Director, National Center for Development of the Holy Places  
Rabbi Mordechai "Solly" Eliav – Director General, Western Wall Heritage Foundation