

## DEFUND RACISM

A Palestinian-led campaign against settler organizations

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## LEGAL CAMPAIGNS

The legal tactics Regavim deploys to advance an ethnic state.

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How Regavim breaks charitable law finance their political platform.

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# Regavim

HOW CHARITABLE DONATIONS ARE FUNDING INDIGENOUS ERASURE





## Organizations contributing to the report



### Youth of Sumud

South Hebron Hills, Palestine  
youthofsumud.org



### Human Rights Defenders

Hebron, Palestine



### Popular Struggle Coordination Committee

Palestine  
popular-struggle.org



### Hebron Defense Committee

Hebron, Palestine



### Good Shepherd Collective

Beit Sahour, Palestine  
goodshepherdcollective.org



### Jisoor

Chicago, Illinois  
jisoor.org



### Just Peace Advocates / Mouvement Pour Une Paix Juste

Canada  
justpeaceadvocates.ca

# The campaign to Defund Racism

The Campaign to Defund Racism is a grassroots national call from Palestinian communities. Rooted in our belief that justice will only come through campaigns that target the policies working to uphold unjust structures, Palestinian individuals, villages, and organizations on both sides of the Green Line—from the South Hebron Hills to the Jordan Valley of the West Bank to East Jerusalem and the unrecognized villages of the Negev have all come together to put forth this call to action.

Although organizations like Ateret Cohanim, Elad, Israel Land Fund, and Regavim were founded in Israel as part of the settler movement, they are fiscally sponsored by charities registered in the United States, Canada, the United Kingdom and elsewhere. Friends of Ateret Cohanim, Friends of Ir David, the One Israel Fund, the Central Fund of Israel and the Israel Independence Fund for example all leverage their 501 (c) 3 status in the United States to fund settler colonialism. This allows these organizations to receive tax-deductible donations from the United States and funnel them abroad. Given each organization's documented history of intentionally targeting non-Jewish communities for displacement and annexation campaigns to develop illegal Israeli settlements, their actions are clearly outside the scope of charitable giving.

The campaign's primary goal is to create a legal precedent, to have clearly defined under the law that organizations supporting the oppression, displacement, and colonization of Palestinian lands are illegal under charitable laws in the United States, Canada, and other places.

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Led by Youth of Sumud, Palestinians organized a mass protest in Masafer Yatta to resist the pending mass displacement of thousands of Palestinians from their historical lands.

*Photo by Youth of Sumud.*

# Introduction

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*The international nonprofit system continues to play a critical role in advancing Israel's program of settler-colonialism and indigenous erasure. The Campaign to Defund Racism outlines how these organizations represent the tip of the spear of the Zionist movement.*

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This report examines a largely unaddressed dynamic within the Zionist settler movement in Palestine, which strategically exploits charity networks to perpetuate and expand Israel's system of settler colonialism in Palestine. For example, these Israeli organizations enjoy the benefits and privileges associated with charitable status through a relationship of financial support with organizations in the United States registered as 501(c)(3) nonprofits as well as government-approved registered charities in Canada.<sup>1</sup> This relationship, referred to as fiscal sponsorship, allows organizations

which are not registered as 501(c)(3) nonprofits in the United States to receive the benefits of tax-deductible donations through a registered charity.<sup>2</sup> Donors to these organizations can claim tax deductions, while the organizations themselves are tax-exempt. In Canada there is no such option for the fiscal sponsorship of non-registered charities, but there is a provision whereby registered charities and foundations can provide funds to another registered charity, thus allowing a charity to act as a conduit to send funds on behalf of multiple organizations or foundations.<sup>3</sup>

By looking closely at the flow of these funds, we can see that behind the facade of organizations on an altruistic and humanitarian mission lies a much more sinister and racist colonial agenda. The flow of charitable donations from the United States, Canada, the United Kingdom and elsewhere to racist Israeli settler organizations carries significant and far-reaching implications. These groups utilize such funds to finance activities that perpetuate structural oppression and systemic violence, ultimately reinforcing settler colonialism and apartheid.

This investigative report focuses on the

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1. Registered charities are charitable organizations, public foundations, or private foundations that are created and resident in Canada. They must use their resources for charitable activities and have charitable purposes that fall into one or more of the following categories: the relief of poverty, the advancement of education, the advancement of religion or other purposes that benefit the community. Registration provides charities with exemption from income tax. Registration also authorizes charities to issue official donation receipts for income tax purposes, allowing donors to claim gifts made to registered charities to reduce their income tax. More information regarding registered charities in Canada can be found at: <https://www.canada.ca/en/revenue-agency/services/charities-giving/giving-charity-information-donors/about-registered-charities/what-difference-between-a-registered-charity-a-non-profit-organization.html>

2. National Council of Nonprofits, "Fiscal Sponsorship for Nonprofits", <https://www.councilofnonprofits.org/running-nonprofit/administration-and-financial-management/fiscal-sponsorship-nonprofits>.

3. Government of Canada, "Canadian registered charities carrying on activities outside Canada," November 27, 2020, <https://www.canada.ca/en/revenue-agency/services/charities-giving/charities/policies-guidance/guidance-002-canadian-registered-charities-carrying-activities-outside-canada.html>.

organization Regavim in order to uncover details of the organization's activities and serve as an educational resource. Our analysis center's Regavim's actions, such as its use of propaganda, surveillance of indigenous communities and publication of materials which work to invert the circumstances on the ground, inaccurately presenting Palestinian communities, and labeling their villages "settlements". These tools are part of a larger effort to displace and ethnically cleanse Palestinian communities, using the colonial legal infrastructure created and upheld by the Israeli state. The organization's pro-settlement lobbying campaigns target Israeli municipal and national governmental bodies, as well as the Coordination of Government Activities in the Territories (COGAT) – the administrative body that regulates every aspect of Palestinian life in the Gaza Strip and the West Bank. Regavim uses a combination of formal legal complaints and informal relationships to advance its cause, building pressure from different angles and using a variety of techniques to the same ultimate goal. Furthermore, an examination of the organization's public records confirms its motives and profound impact on the perpetuation of settler colonialism in Palestine. The violence inherent to the organization's vision and goals are illustrated through the tangible impacts on the communities that it targets – through the loss of community privacy and security, home demolitions, resource theft, as well as physical displacement and ethnic cleansing. In this case, these patterns are deliberately designed to displace indigenous communities in favor of a settler movement.

When funds from international donors, designated as charitable contributions, are channeled into Israeli organizations that uphold and perpetuate violence and oppression, it not only





HEBRON, PALESTINE  
PHOTO: HUMAN RIGHTS DEFENDERS

exacerbates violence but also accelerates the erasure of indigenous communities. As this report will illustrate, organizations such as Regavim utilize these resources to expand their workforce, recruit volunteers and tourists, build relationships with Israeli politicians, law enforcement officials and bureaucrats, advance their leadership's political careers, invite meetings and tours with foreign diplomats and politicians, actively lobby against policies intended to alleviate socio-economic disparities, and disseminate racist and colonial propaganda.

As has been established, Regavim and other settler organizations are able to do this work in

part due to the support of international organizations that serve as their fiscal sponsors, granting them access to tax-deductible donations. In Regavim's case, despite the organization's intentional efforts to obscure its fiscal sponsors, there are two known U.S.-based sponsors. Asor Fund is a known current sponsor.<sup>4</sup> In recent years, the Central Fund of Israel (CFI) has served as one of Regavim's largest donors through fiscal sponsorship. Despite intentional efforts by both Regavim and CFI to conceal this information, CFI continues this fiscal sponsorship today.<sup>5</sup>

Regavim's website offers tax receipts to

4. The Asor Fund is an Israeli nonprofit, based in Jerusalem, which founded JGive, a platform through which individuals can donate to Jewish and Israeli nonprofits worldwide. JGive is also associated with the Friends of Asor Fund US. JGive, "Regavim", <https://www.jgive.com/new/en/ils/charity-organizations/1170>.

5. Regavim has held a consistent practice of preventing the identification of many of its donors by blacking out information on its financial reports. Furthermore, while CFI lists a number of its sponsors directly on its homepage, including far-right lawfare group Shurat HaDin, it does not feature Regavim as one of these options. This suggests that CFI has made an intentional decision to impede information gathering regarding the relationship between these organizations. The authors of this report received confirmation from CFI itself that the fiscal sponsorship continues today.



Canadian donors. As a result, in Canada, at least one registered charity has been found to provide tax receipts for funds designated by Canadians to Regavim. Mizrachi Organization of Canada (Canada business number 119043891 RR 0001), a Canadian charity, provides receipts for Regavim according to Jgive.<sup>6</sup> This has been confirmed in emails from Jgive as well as through obtaining a tax receipt from Mizrachi Organization of Canada through a donation made to Regavim via Jgive.

These major transgressions, carried out under the guise of charitable work, have led to a mounting demand for accountability for the organizations sponsoring Regavim. In the United States, grassroots formations have mounted campaigns which challenge the tax-exempt status of Regavim's fiscal sponsors (CFI and Asor Fund), as outlined in Section 501(c)(3) of the United State's Internal Revenue Code. A U.S.-based 501(c)(3) organization is mandated to operate exclusively for religious, charitable, scientific, literary, or educational purposes. In Canada, a complaint was filed with the Canada Revenue Agency on December 13, 2022 providing proof of Mizrachi Organization of Canada's acting as a conduit for funds being



On April 2, 2022 Israeli settlers attack Zaidan Al-Sharbaty with stones in Shuhada Street Kindergarten in the center of Hebron city.

*Photo by: Human Rights Defenders*

sent to Regavim, along with information about Regavim that shows the contravention of its activities with regard to Canadian policy, international law and Canadian tax law.<sup>7</sup> A grassroots campaign "Colonialism is not charity" was launched with organizations joining to support the call through letter writing, social media, webinars and actions in December 2022 when Regavim came to Toronto.<sup>8 9</sup> These campaigns illustrate both the acknowledgement

6. Operationally, jgive.com functions as an online platform where potential donors can search through hundreds of organizations in the Israeli non-profit sector, as well as non-Israeli Jewish nonprofits. In Canada, Mizrachi Organization of Canada provides tax receipts for donations made by Canadians.

7. Subsequently three additional complaints have been made providing additional details of other Israeli settlement and military organizations receiving funds from Mizrachi Organization of Canada, and further violations of organizations including Regavim that are contrary to Canadian law and policy. Also, information regarding other charitable foundations and organizations that are providing money to Mizrachi Organization of Canada were identified and the complaint asked that these be investigated as well as Mizrachi Organization of Canada.

8. Campaign information including articles and letter writing: <https://www.justpeaceadvocates.ca/30-group-tell-the-canada-revenue-agency-that-colonialism-is-not-charity/> and <https://www.justpeaceadvocates.ca/foreign-settler-colonial-ngo-founded-by-proud-homophobe-receiving-canadian-subsidies/>

9. Webinar available at: <https://www.justpeaceadvocates.ca/colonialism-is-not-charity-defunding-palestinian-racism/> and more information found at: <https://www.justpeaceadvocates.ca/colonialism-is-not-charity-defunding-palestinian-racism/>



Israeli MKs were photographed today in Homesh, an Israeli outpost near Burqa, north of Nablus. MK Silman was seen alongside Bezael Smotrich, co-founder of Regavim and Itamar Ben Gvir, linked to the Israel Land Fund.

*Photo from Regavim's WhatsApp group chat*

of a problem, and the reality that the infrastructure to propose and execute solutions exists. The funding structures supporting Regavim and other settler organizations propagate hate, discrimination, racism, violence, and flagrantly violate the fundamental principles underlying charity.

To effectively disrupt these colonial funding processes, it is imperative to mobilize collective action and establish robust systems of accountability. It is not enough to simply examine or criticize the operations of these organizations; we must also rigorously scrutinize the sources, mechanisms, and allocations of their financial resources. The Defund Racism Campaign endeavors to comprehensively investigate the financial support behind these entities, while directing public support and resources to aid communities most affected by the actions of settler organizations. Our aim is to address the

problem of settler organizations' abuse of the international charitable system by utilizing and strengthening the existing oversight mechanisms.

The information outlined in this report will serve as a resource for comprehensive investigations into their activities and financial records, with the ultimate goal of disrupting the flow of charitable funds — either through the revocation of the nonprofit status of the fiscal sponsor, or through a decision which makes it impossible for the settler organization to receive charitable donations in the state, thereby revoking any privileges. Through strategic litigation, advocacy efforts, and policy reform, we can effectively challenge the status of the organizations financing Regavim's operations, disrupting their ability to utilize charitable donations for harmful endeavors.

For example, in the United States, the Internal Revenue Code (IRC) Section 501(c)(3) establishes

the criteria for tax-exempt charitable organizations in the United States. It requires that such organizations operate exclusively for religious, charitable, scientific, testing for public safety, literary, or educational purposes.<sup>10</sup> Because U.S.-based nonprofits are registered at both the federal and state level, states also have their own set of regulations relating to these organizations' status. In Canada charities are registered federally. At the federal level, the Canada Revenue Agency (CRA) administers the registration of charities under the Income Tax Act.<sup>11</sup> The Canada Revenue Agency is the regulator responsible for the compliance of charities.<sup>12</sup> Making an in-depth examination of Regavim's strategic goals, vision, body of work over the years, and general impact, we illustrate that it violates the basic premise of charitable work enshrined in U.S. federal and state law. In doing so, we argue that this should exclude any non-profit from being its fiscal sponsor in the United States. In Canada, other charitable organizations which donate to a charity that is acting as a conduit to provide funds to an organization such as Regavim should also be investigated.<sup>13</sup> It has also been noted in Canada that there is a phenomenon referred to as a

“burner charity” that sometimes occurs when charities have their registration revoked for non-compliance by the Canada Revenue Agency, whereby the donation pattern to out of country organizations is picked up by a new charity, showing a pattern of relationship between several aligned charities.<sup>14</sup> Therefore, complaints call on the Canada Revenue Agency to investigate associated charities as well as the charity identified as the main conduit transferring donations to Regavim as well as other Israeli settler or military organizations.

Fostering public awareness and promoting education about these issues — and the role of settler organizations in the ongoing colonization of Palestine — are crucial to accelerating the campaign to dissolve these organizations and systems in their entirety. Donors must be duly informed about the potential misuse of their funds and equipped with the necessary resources to ensure their donations contribute to positive social change. Transparency, rigorous and accountable investigation, and resolute resistance serve as our tools in dismantling the funding structures which support violent and racist efforts, propelling us toward societies that are more equitable and just.

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10. Internal Revenue Service, “Exempt Purposes – Internal Revenue Code Section 501(c)(3),” June 9, 2023, <https://www.irs.gov/charities-non-profits/charitable-organizations/exempt-purposes-internal-revenue-code-section-501c3>

11. Government of Canada, “Income Tax Act” (R.S.C., 1985, c. 1 (5th Supp.)), <https://laws-lois.justice.gc.ca/eng/acts/I-3.3/>.

12. Canada Revenue Agency as regulator see: <https://www.canada.ca/en/revenue-agency/services/charities-giving/giving-charity-information-donors/about-registered-charities/what-role-does-federal-government-play-regulation-charities.html>

13. A conduit is a registered charity that receives donations from Canadians, issues tax-deductible receipts, and funnels money without direction or control to an organization to which a Canadian taxpayer could not make a gift and acquire tax relief. Acting as a conduit violates the Canadian Income Tax Act and could jeopardize a charity's registered status.

14. Miles Howe, Paul Sylvestre, “International Cash Conduits and Real Estate Empires: A Case Study in Canadian Philanthropic Crime,” *Journal of White Collar and Corporate Crime* (2022): 2631309X221138974.

# Regavim

*“We approached the authorities a number of times about this issue, and applied pressure for the law to be enforced. Soon after, this week, the enforcement authorities restored the area to its original state and tore down the illegal structures.” – Regavim*

Regavim is an Israel-based non-governmental organization. It is sometimes described as a “think tank” and “lobbying group”.<sup>15</sup> It works to expand Jewish control of land across historical Palestine by influencing Israeli administrative, judicial, legislative, and military institutions.<sup>16</sup> These efforts ultimately work to dispossess Palestinian and other non-Jewish communities of their land. Regavim gathers data on Palestinian communities, publishes racist, ahistorical and misrepresentative reports, formulates right-wing policy proposals, and engages in legal proceedings to achieve its objectives.

Regavim, the “Movement for the Protection

of National Lands”, was founded in 2006 by Yehuda Eliyahu and Bezalel Smotrich as a response to the Israeli state-enforced evacuation of Israeli settlers from Gaza and immediately following the removal of Israeli settler families from nine homes in Amona.<sup>17</sup> The two founders were joined by a small group of settlers, former soldiers, and right-wing Israeli activists. The organization’s name literally translates to “clumps of earth,” in Hebrew, and draws from a Zionist poem about “reclaiming the land of Israel” written during the period of Ottoman control over Palestine, which includes a line “dunam by dunam, regev by regev.”<sup>18</sup>

Regavim describes itself as “a public movement dedicated to the protection of Israel’s national lands and resources” dedicated to the mission of “[r]estoring the Zionist vision to its primary role in the Israeli policy process.”<sup>19</sup> Notably, “state land”, “Israel”, “national lands”, and other such terms are defined by Regavim in practice as all of the lands currently under Israeli control, with no distinction between Israel within its 1948 borders and the West Bank, for example. This decision allows Regavim to treat the socio-political situation across these various geographies as one of a single rule of law, despite the reality that Palestinians, and the land in which they reside, are subjected to many “rules of law” which differ according to

15. Ben White, “London event starring pro-settler group has rightfully sparked controversy,” *Middle East Eye*, August 27, 2019, <https://www.middleeasteye.net/opinion/london-event-starring-pro-settler-group-has-rightfully-sparked-controversy>.

16. This geographic scope includes: modern-day Israel within its 1948 borders, Jerusalem, the West Bank, and Gaza. Regavim is also active in the occupied Syrian Golan Heights.

17. Neve Gordon and Nicola Perugini, *The Human Right to Dominate*, (Oxford University Press, 2015), 46.

18. Alex Traiman, “Tension building,” *The Jerusalem Post*, June 13, 2013, <https://www.jpost.com/metro/features/tension-building-316390>.

19. Regavim, “About Us”, <https://www.regavim.org/about-us/>.

the identity imposed upon them (Israeli citizens, East Jerusalem residents, West Bank ID holders, Gazan ID holders, and those in the diaspora) and according to the fragmented the geography in which they reside.<sup>20</sup> In contrast, Israeli citizens are generally subjected to the same rule of law (and, importantly, legal privileges) regardless of whether they are residents living in Tel Aviv or a settlement in Hebron.<sup>21</sup> This interpretative choice by Regavim creates a false narrative that ignores the massive differences in Palestinians' access to basic needs as compared to Jewish Israelis, such as the ability to acquire building permits or access to reliable electricity, in all areas under Israeli military control.<sup>22</sup>

In executing its colonial vision, Regavim divides its work into three distinct arenas described on its website: field work, research, and legal divisions.<sup>23</sup> Its field work involves engaging in invasive and aggressive surveillance of Palestinian villages and individuals and emboldening settlers to infringe on Palestinian property, civil and human rights. This includes the use of drones to fly over and surveil private Palestinian property with no prior consent by the landowners.<sup>24</sup> Using the data collected from its surveillance activities, Regavim produces and publishes misrepresentative, and often openly unfactual, reports that wrongfully portray indigenous Palestinians as settlers in their own homes and lands. These reports are then used to support lawfare campaigns



Israeli settler attack in  
Masafer Yatta  
Photo: Youth of Sumud

20. Visualizing Palestine, "Some People Are More Equal Than Others", September 2019, <https://101.visualizingpalestine.org/visuals/some-people-are-more-equal-others>.

21. Hiba Hussein, "Legal Duality in the West Bank," *Palestine-Israel Journal: The Dual Legal System* vol. 21 no. 3 (2016): 22; Quigley, John. "Living in Legal Limbo: Israel's Settlers in Occupied Palestinian Territory." *Pace Int'l L. Rev.* 10 (1998): 1.

22. Jihad Harb, Alaa Lahluh, Walid Ladadweh, "A case study on Home Demolition and Denial of Building Permits in Area C," *Palestinian Center for Policy and Survey Research*, June 2021, [https://www.pcpsr.org/sites/default/files/PSR%20case%20studies\\_building%20permits\\_English.pdf](https://www.pcpsr.org/sites/default/files/PSR%20case%20studies_building%20permits_English.pdf).

23. Regavim, "Homepage," [regavim.org](http://regavim.org); Notably, in 2015 the organization's main activities were listed as "rule of law, regime or administration", and "environmentalism" was listed as the secondary activity.

24. Wassim Ghantous, Mikko Joronen. "Dromoelimination: Accelerating settler colonialism in Palestine." *Environment and Planning D: Society and Space* 40, no. 3 (2022): 393–412.

against vulnerable Palestinian communities through the Israeli court system, as well as lobby the Israeli government to enact stricter policies perpetuating the demolition of Palestinian homes and displacement of villages.<sup>25</sup> The organization primarily targets two populations: Bedouins in the Naqab/Negev and Palestinians (including Bedouins) living in Area C of the West Bank. Notably, Regavim and its network of settlers advocate for the eviction of the vulnerable Bedouin community of Khan al-Ahmar from their historic lands, an act that the International Criminal Court's Chief Prosecutor Fatou Bensouda suggested may constitute a war crime.<sup>26</sup>

Their annual reports outline four primary goals, including the promotion of land registration in the West Bank, solidifying the implementation of the Kaminitz Law,<sup>27</sup> preventing Palestinian construction on land in Area C, and shutting down "illegal" and environmentally damaging quarries.<sup>28</sup> These objectives are pursued through parliamentary activities, such as influencing

debate and policy in Knesset committees and producing comprehensive and invasive reports, as well as through public and media campaigns. In addition, Regavim often organizes and/or engages in public demonstrations to further its agenda. These public demonstrations can often manifest violently in Palestinian villages in area B and C, as well as in the Naqab.<sup>29</sup> <sup>30</sup> Regavim's concerning political positions and actions highlight the need for a closer examination of its activities and the potential legal transgressions associated with its pursuit of land colonization.

The following sections will present an overview and analysis of Regavim's work according to the organization's main areas of operation and impact. The next section will introduce some key figures in Regavim's history and contemporary status, followed by a review of five aspects of Regavim's operations: field work/surveillance, organizing with hate groups, legal efforts in pursuit of demolitions and ethnic cleansing, political lobbying, and public communications.

25. Regavim, "Khan al Ahmar: the gift that keeps on giving," November 7, 2019, <https://www.regavim.org/khan-al-ahmar-the-gift-that-keeps-on-giving>.

26. International Criminal Court, "Statement of the Prosecutor of the International Criminal Court, Fatou Bensouda, regarding the Situation in Palestine," Office of the Prosecutor, October 17, 2018, <https://www.icc-cpi.int/news/statement-prosecutor-international-criminal-court-fatou-bensouda-regarding-situation-palestine>.

27. The Kaminitz Law is the commonly used name for the 116th amendment to the Israeli Law of Planning and Construction from 2017. It allows administrative enforcement against illegal construction and severe penalties without a legal process. It was promoted mainly by Yamina politicians (Ayelet Shaked and Naftali Bennet) with the intention of being applied to Bedouins and Palestinian towns and villages. It was then frozen in 2019 by Netanyahu. Ayelet Shaked promised to amend the law in such a way that it could only be applied against non-Jews, and negotiations continue to this day.

Reference: תכרע, "ן, לודנ זכרמ תכרע – ןינימק קוח", "2023 תנשל מלשה ךירדמה – ?לטוב המלו רצונ המל – ןינימק קוח", February 9, 2022, <https://www.nadlancenter.co.il/article/5077>.

28. Regavim, *Annual Report 2020*, January 28, 2021, <https://www.regavim.org/wp-content/uploads/2021/01/Regavim2020DochENG2601.pdf>.

29. Regavim, "Waking up, getting out there," *Facebook*, June 21, 2021, <https://www.facebook.com/regavimeng/posts/pfbid0tnvPw3RNkpf8tdb2QkmSsSNLRf1ZjRBu9VmaKRbxYccspYexzc6jPwkpfPBZGEUVI>.

30. Regavim, "The Regavim movement, along with..." *Facebook*, October 10, 2021, [https://www.facebook.com/groups/273694016147743?multi\\_permaLinks=1833584120158717&hoisted\\_section\\_header\\_type=recently\\_seen](https://www.facebook.com/groups/273694016147743?multi_permaLinks=1833584120158717&hoisted_section_header_type=recently_seen).

# Key figures

*While structures shape an organization's operations, the personalities ultimately animate and set the machinations into action.*

The table below introduces four of the key figures associated with Regavim, including its current CEO/General Director Meir Deutsch, the Director of the International Division Naomi Linder Kahn, and its two founders, Bezalel Smotrich and Yehuda Eliyahu. These brief introductions to the individuals will help contextualize the subsequent review of Regavim's operations, which relate very closely to the work of these individuals.

To understand the role Regavim has played in Israeli politics and policymaking since 2006, it is essential to look closely at the political ascent of related figures including Bezalel Smotrich, who was able to achieve his prominence through the relationships he made as a leader of Regavim. Today, as a minister in the current government with considerable influence over the Israeli Civil Administration – a state body which implements

the day-to-day enforcement of Israeli military and legal control over the West Bank – Smotrich has worked to facilitate the regularization (legalization) of settlements on Palestinian land.<sup>31</sup> Furthermore, Smotrich has used his position as “de facto governor of the West Bank” to install Yehuda Eliyahu, Regavim co-founder, as the head of Settlement Administration within the Ministry of Defense. This means that Eliyahu, a West Bank settler himself, former Regavim CEO, as well as the former head of the Mateh Binyamin Settlement Council, currently holds an unelected position of considerable power with regard to the administration of West Bank settlements.<sup>32</sup> These actions remain significant to the role Regavim plays not only due to these new and influential government connections, but because Deutsch himself has been quoted as saying that Regavim is “imprinted” with Smotrich's DNA.<sup>33</sup> Notably, Eliyahu is not the other former Regavim associate who has been promoted into a position of authority following Smotrich's political ascent. Sraya Demski, now Smotrich's chief of staff, was previously a board member of Regavim.<sup>34</sup>

31. Louis Imbert, “Bezalel Smotrich, the extremist settler, is making his mark on the Israeli government,” *Le Monde*, March 9, 2023, [https://www.lemonde.fr/en/international/article/2023/03/09/bezalel-smotrich-the-extremist-settler-is-making-his-mark-on-the-israeli-government\\_6018684\\_4.html](https://www.lemonde.fr/en/international/article/2023/03/09/bezalel-smotrich-the-extremist-settler-is-making-his-mark-on-the-israeli-government_6018684_4.html).

32. הלשממה, “וןחטיבה דרשמב (ש”יב מייחרזא מיתוריח תרדסה) תובשייתהה תלהנימ שאר יונימ רושיא,” *gov.il*, הלשממה ה37, February 23, 2023, <https://www.gov.il/he/departments/policies/dec168-2023>.

33. David Israel, “Man of the Year 5782: Regavim, the Most Grownup Rightwing NGO in the Room,” *Jewish Press*, September 25, 2022, <https://www.jewishpress.com/news/israel/man-of-the-year-5782-regavim-the-most-grownup-rightwing-ngo-in-the-room/2022/09/25/>.

34. Mike Wagenheim, “Regavim's point woman in the US says American Jewry has it all wrong,” *Jewish News Syndicate*, July 10, 2023, <https://www.jns.org/jewish-diaspora/bezalel-smotrich/23/7/10/301518/>.



**Meir Deutsch**  
Current CEO/Director General

Before becoming CEO, Deutsch was the director of policy and government relations at Regavim. According to his self-report, he has been employed by the organization since its founding in 2006.



**Bezalel Smotrich**  
Cofounder of Regavim

Smotrich was a co-founder of Regavim and active in the organization until his election into the Israeli Knesset in 2015. He has become infamous for his openly racist statements against Palestinians and public calls for violence against communities. Deutsch has stated that although Smotrich is no longer an official leader of Regavim, his DNA is imprinted on the organization.



**Naomi Linder Kahn**  
Director of the International Division

Kahn has been the international face of Regavim over recent years, notably facing considerable backlash in London for over a speaking event there.



**Yehuda Eliyahu**  
Cofounder and former director of Regavim

Eliyahu went on from his position at Regavim to serve as the head of the Binyamin settlement council (located in the northern West Bank). Since 2023 and following Smotrich's new position as minister within the government, it appears that Eliyahu has been appointed to the position of head of the Settlement Administration, promoting the construction and legalization of West Bank settlements in the Ministry of Defense. This administration and position was created by Smotrich himself.



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# Field work & Surveillance

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*"We routinely find Regavim's field workers in our communities with cameras, flying drones, and trespassing on our lands. Even though we are simple communities, when we see Regavim's workers, we understand that they are here to take our lands and properties. It's hard for us to believe this organization can be a charity. How can destroying people's lives be considered charity?"*

– Sami Huraini, Youth of Sumud

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Regavim is perhaps best known across rural areas of the West Bank as the operators of drones used to surveil Palestinian villages without their consent. Particularly across Area C of the West Bank, but also in the Naqab and elsewhere, Regavim uses its own private drones to monitor “unauthorized construction” within Palestinian communities. The information the organization collects through this “field work” is used to coordinate with the Israeli Civil Administration and push for new demolition orders and the execution of demolitions where these orders already exist; it also supports the creation of reports that misrepresent Palestinian communities and their history, and the filing of petitions in the Israeli High Court to escalate demolition efforts or target entire villages for displacement. Regavim uses charitable funds for the lobbying of Israeli politicians to support demolitions as well as create policies that further restrict Palestinian development. Furthermore, it attempts to attack and/or dissuade international donors, such as the European Union, from providing materials (such as materials to build shelters, schools, restrooms) to support vulnerable Palestinian



An aerial image was taken of a Palestinian restaurant in Bethlehem, which Regavim is currently advocating for destruction. Surveillance is part of Regavim's drone project, a unit within Regavim that deploys drones to surveil Palestinian communities.  
Photo by Regavim

communities. In general, Regavim uses the information it gathers through surveillance to entrench and expand its network of influence at the very tangible and personal detriment of Palestinian communities.

Local Palestinian organizations such as the Good Shepherd Collective have documented Regavim's use of drones, particularly across the West Bank. Some of these events, published on social media, illustrate the ways in which Palestinians local to Masafer Yatta and other regions of South Hebron see the organization as an instigator for demolitions. A post from January 2, 2020 describes members of Regavim traveling between Palestinian villages and pointing out specific structures to the Civil Administration, presumably because they were built without permits. The report states:

*"This morning, a delegation of Civil Administration officers along with Military commands [sic] accompanied by Regavim flew a worker drone to [the] South Hebron Hills area. They first [stopped] by the village of Mufakara and signaled with their hands toward the*



Far-right organizations organized a march through the Palestinian town of Hebron in August of 2023. These tours usually result in Israeli soldiers detaining Palestinians, invading homes, and Israeli settlers overturning shops. These Zionist organizations, such as the Hebron Fund and Regavim, use charitable donations from Canada and the US to organize these tours..

*Photo by Human Rights Defenders.*

*people's homes. Then, they moved to... the village of [Khallet al Dabbe'] and also pointed with their hands toward the people's houses. They continued their journey toward Masafer Yatta villages to stop by the Village of Al Majaz. On their way back from the village, they stopped the Palestinian Mobile Health Clinic to order the driver along with the clinic staff to drive their car between the officers cars. After they [confiscated] the clinic, they continued their journey toward the village of Susiya where they also did the same. After the*

*officers toured the area of South Hebron Hills, they went back to the Israeli military camp in the settlement of Susyah, where they kept the clinic and its staff under arrest.”<sup>35</sup>*

Although this description does not make it clear whether Regavim was present for the entirety of the military's actions that day, it illustrates the perception among Palestinians that the organization works hand in hand with the Civil Administration to escalate and

35. Good Shepherd Collective, “This morning, a delegation of Civil Administration officers...” *Facebook*, January 2, 2020, <https://www.facebook.com/goodshepherdcollective/posts/pfbid0WGSYsmAcWf9x61wNnmk75qXuV97yGvmDDhetbWMnWJec7mREuL8Y18Rtrux5GBJyl>.

accelerate the process of demolitions. This notion is reinforced by scholarly examinations of Regavim's "drone unit".<sup>36</sup> In a 2022 publication Ghantous and Joronen argue, "By intensifying surveillance over Palestinian villages, [Regavim's drone unit] aims to shorten the detection-time of 'illegal' constructions and thus to accelerate the ICA's administrative procedures for demolition. Drone surveillance is conducted in cooperation between Regavim and local settler volunteers (supported by settlement councils) who are given the role of 'field inspectors'. The main task of these 'field inspectors' is to frequently fly surveillance drones over the nearby Palestinian communities. When suspicion over construction arises, video and still photo materials recorded by the 'drone unit' are cross-referenced in mapping software programs and reported to ICA, which is urged to halt construction and place demolition orders."<sup>37</sup>

The scrutiny given to this work, both by Palestinian organizations and academic researchers, highlights its visibility on the ground as well as the perception that it is, in fact, having an effect on the process of demolition. Not only does Regavim serve as a sort of non-state entity scrutinizing and policing Palestinian construction, but its drone project also allows it to pose as a watchdog organization for alleged inaction by Israeli authorities when the speed of demolition does

not match the organization's expectations. As reports of drone surveillance by Regavim can be found in Palestinian communities wherever construction is constrained and denied Israeli authorization, it is evident that whether or not this practice has an impact on the speed of demolition processes, there is an impact felt within the communities being surveilled.

Another notable case of surveillance relating to Regavim involves the organization's alleged financial support for the secretive commissioning of surveillance activities which targeted well-known Israeli human rights lawyer, Michael Sfard. According to a report published by *Haaretz's* Uri Blau, Regavim "commissioned and paid for the private investigation into Sfard" from 2010 to 2013, working alongside another far-right Zionist non-governmental organization, Im Tirzu.<sup>38</sup> This is a considerable allegation as Regavim's lawyers, while petitioning for demolitions and the forced displacement of Palestinians, often find themselves in court opposite Sfard. Furthermore, allegations outlined in the article suggest that the private investigator endorsed by Regavim may have unlawfully broken into Sfard's office.<sup>39</sup> Such actions raised significant legal concerns, particularly regarding the misappropriation of charitable donations intended for Regavim. Numerous legal protections exist to prevent the misuse of charitable funds, particularly for the purpose of spying on human rights lawyers.

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36. Wassim Ghantous, Mikko Joronen, "Dromoelimination."

37. Wassim Ghantous, Mikko Joronen, "Dromoelimination," p.401.

38. Uri Blau, "Did Israeli Settler Group Use Government Funds to Spy on Human-rights NGOs?" *Haaretz*, January 19, 2016, <https://www.haaretz.com/israel-news/2016-01-19/ty-article/israeli-state-funded-settler-group-spied-on-human-rights-ngos/0000017f-e2aa-d7b2-a77f-e3af30bc0000>.

39. Blau, "Israeli Settler Group Use Government Funds to Spy".

# Facilitating violence

*The international nonprofit system continues to play a critical role in advancing Israel's program of settler-colonialism and indigenous erasure. The Campaign to Defund Racism outlines how these organizations represent the tip of the spear of the Zionist movement.*

Regavim has also used its nonprofit status to orchestrate religious mobs. Throughout May 2021, Israeli extremist settlers coordinated attacks on Palestinians in Lydda (Lod), resulting in assaults on Palestinians, property damage, and hate crimes targeting Muslim centers of worship.<sup>40</sup> Fanning the flames of racism, Regavim played an active role in mobilizing the settler community to participate in these reprehensible acts, setting up a “citizen’s militia” (translated from Hebrew).<sup>41</sup> This militia brought armed

Israelis from all over the country to Lydda at a time when Palestinians in the city were already facing targeted violence.<sup>42</sup> Regavim’s CEO, Meir Deutsch, is the representative named by the organization as establishing and participating in the creation of this “citizen’s militia”. Reportedly this militia was created to “help the people of Lod”, though it is clear that this is a reference to the Jewish Israeli population of Lydda, as Regavim also reports that it is engaged in “a battle for Jewish life and sovereignty in the country” – not for the wellbeing or safety of all citizens.<sup>43</sup> Deutsch’s reflections on this organizing effort emphasized the perceived necessity for the [Jewish] residents to “defend themselves,” not only erasing the reality that Palestinian citizens in Lydda were facing organized attacks, but further inflaming the racist rhetoric against them by describing the situation as a “battle for Jewish life and sovereignty”.<sup>44</sup> Regavim also named specific

40. Lubna Masarwa, Frank Andrews, “Lod: Armed settlers roam streets as mosque attacked and night curfew ordered,” *Middle East Eye*, May 12, 2021, <https://www.middleeasteye.net/news/israel-palestine-armed-settlers-lod-mosque-attacked-night-curfew>.

41. Regavim, “לכונן מא מג: תסנכב מוריחה סנכב רמא, דול ישנא תרזעל יחרזאה ל”מחה תא המיקהש סיבגר תעונת ל”כנמ שטיוד ריאמ”, *Regavim* (Hebrew version), May 30, 2021, <http://bitly.ws/SNgq>.

42. מיבגר תעונת, “...שטיוד ריאמ”, *Twitter*, August 21, 2021, [https://twitter.com/Regavim\\_IL/status/1421743666490658816](https://twitter.com/Regavim_IL/status/1421743666490658816).

43. Regavim, “הנידמב תידוהיה תונביריה מייחה לע הכרעמב ונלוכ עובשכ הזמ...”, *Regavim*, May 20, 2021, <https://www.regavim.org.il/ב-וןרחאה-עובשכ-ונישעש-המ-הנה-וניחא-נעמל/>.

44. Regavim, “הנידמב תידוהיה תונביריה מייחה לע הכרעמב ונלוכ עובשכ הזמ...”

Palestinian leaders in Lydda as threats, calling for their arrest and interrogation by police at a time when Jewish Israelis in Lydda were storming local mosques.<sup>45</sup>

As armed vigilantes, among them those called to Lydda by Regavim, stormed the area, violence against the local Palestinian community continued to rise, with live fire and other

"These organizations, by advancing Israeli settlement, are literally financing and sponsoring violence."  
– Badia Dweik, Human Rights Defenders

weapons utilized by both the police and roaming groups of Israeli ultranationalists.<sup>46</sup> This ultimately resulted in the killing of Palestinian citizen Mousa Hassouna, 31, when Israeli nationalists allegedly fired indiscriminately into a crowd of Palestinian demonstrators.<sup>47</sup>

Throughout the month of May 2021, Regavim made many calls for donations, presenting its work in Lydda as humanitarian and protective of a besieged Jewish community. While it is possible that Regavim may have provided some assistance to Jewish Israelis in Lydda, it cannot be overlooked that at the center of the

organization's efforts during this time was the call for armed ultranationalist Israelis, en masse, to travel to Lydda in service of the Jewish community. Whether Regavim explicitly stated that these volunteers were there to "defend" against Palestinians in the community is almost irrelevant, as there was no mention of assisting Palestinian community members at a time that they were subject to racialized attacks and largely left without any protection from the police. Furthermore, Regavim's framing of the situation as a "battle for Jewish life and sovereignty" implicitly places Palestinians as enemies in a violent struggle, as the only real threat to "Jewish life and sovereignty". It is difficult to imagine how these actions could be described as charitable by any reasonable consideration of charitable law. Fiscal sponsors operating within the U.S. may encounter significant legal and ethical consequences if it is determined that their funds were employed in organizing the event that resulted in the tragic death of Mousa Hassouna in Lydda. U.S. legislation mandates that charitable organizations adhere to specific criteria to uphold their tax-exempt status as outlined in the Internal Revenue Code (IRC) Section 501(c)(3). Engaging in activities that directly contribute to violence or illicit actions, such as vigilantism, falls outside the permissible bounds of the code's "charitable, religious, educational, or scientific" purposes. Should evidence substantiate the misuse of funds in such a manner, the organization risks forfeiting its tax-exempt status, and potentially facing further legal repercussions.

45. Masarwa, Andrews, "Lod".

46. Human Rights Watch, "Israel: Abusive Policing in Lod During May Hostilities," December 14, 2021, <https://www.hrw.org/news/2021/12/14/israel-abusive-policing-lod-during-may-hostilities>.

47. Masarwa, Andrews, "Lod".

# Legal campaigns

*Colonialism has always employed a veneer of legality to legitimize its exploitative endeavors. Like every other colonial power, Israel has strategically established courts and promulgated the "rule of law" in occupied territories. However, these legal systems are biased, privileging the colonizers' interests over indigenous rights. This is how Regavim exploits colonial courts to dispossess the indigenous Palestinians, capture their natural resources, and subvert their traditions, all under the guise of lawful authority.*

Regavim also utilizes U.S. charitable funds to subsidize its campaigns of indigenous displacement. Regavim has been conducting an ongoing campaign aimed at demolishing and displacing the Bedouin community of Khan al-Ahmar for more than a decade.<sup>48</sup> In 2018, Fatima Bensouda, the Prosecutor of the International Criminal Court at the time issued a warning, stating that the demolition of Khan

al-Ahmar could constitute an international war crime.<sup>49</sup> Despite the public warning from the ICC, Regavim persists in pushing the case forward and running a public campaign to increase pressure on the government.<sup>50</sup>

Khan al-Ahmar is just one among many isolated indigenous communities targeted by Regavim in its campaign for the forced displacement of Palestinians. Regavim's use of charitable funds for legal campaigns aimed at mass execution of demolition orders in places like Susya, potentially resulting in ethnic cleansing of the local population, again raises significant ethical and legal concerns. Legal actions that lead to the displacement of indigenous communities certainly fall outside of the permissible categories of charity. Importantly, despite the organization's emphasis on "law and order", it has never once filed a complaint against illegal Jewish construction, in the West Bank or elsewhere, nor included such efforts in any published reports. This may be because, as others have reported, many of Regavim's employees, volunteers, and supporters live in homes that

48. Regavim, "Khan al Ahmar saga rolls on," *Facebook*, November 2, 2020, [https://m.facebook.com/story.php?story\\_fbid=pfbid02EfVfbY7k12yJ9G3Wxpid3hWz6GcjQCSVzZ57djcxi1hbcj5MLQc8j2u3Vp7gWmzl&id=259585924100042&mbextid=qC1gEa](https://m.facebook.com/story.php?story_fbid=pfbid02EfVfbY7k12yJ9G3Wxpid3hWz6GcjQCSVzZ57djcxi1hbcj5MLQc8j2u3Vp7gWmzl&id=259585924100042&mbextid=qC1gEa).

49. International Criminal Court, "Statement of the Prosecutor of the International Criminal Court".

50. Regavim, "רחמא לא נאח", *Regavim* (Hebrew version), last updated May 9 2021, <https://www.regavim.org.il/tag/%D7%97%D7%90%D7%9F-%D7%90%D7%9C-%D7%90%D7%97%D7%9E%D7%A8/>.



Regavim has been leading the campaign to evict the Palestinian community of Khan al-Ahmar to advance Israeli expansion around Jerusalem. Here is a surveillance photo taken by Regavim which outlines the embattled community of Khan al-Ahmar. If Regavim's petition wins out, some 32 families and 200 Palestinians will be forced off their lands to pave the way for Israeli settlements.

*Photo by Regavim*

have been constructed illegally.<sup>51</sup>

The protracted legal battle over Susiya's status, initiated by Regavim's petition to the Israeli High Court of Justice in 2012 and still ongoing, has resulted in a state of perpetual insecurity for residents of Susiya.<sup>52 53 54</sup>

Although the court ruled in 2018 to permit the

demolition of at least three structures, the Israeli government has, thus far, refrained from promptly executing these orders, indicating a strategic approach of sustaining a constant threat rather than carrying out the demolitions.<sup>55</sup>

In Israel, Regavim garnered increased

51. Hagar Shezaf, "This Pro-Settler NGO Has Been Shaping Israeli Policy for Years. Now, It's in Control," *Haaretz*, April 27, 2023, <https://www.haaretz.com/israel-news/2023-04-27/ty-article-magazine/.premium/this-pro-settler-ngo-has-been-shaping-israeli-policy-for-years-now-its-in-control/00000187-c2cc-d628-ade7-c7ed62700000>.

52. Ghantous, Joronen, "Dromoelimination".

53. תיתרבוה, "Regavim against Susiya," *Youtube*, April 7, 2013, [https://www.youtube.com/watch?v=rLyvUYbM82k&ab\\_channel=%D7%94%D7%97%D7%91%D7%A8%D7%AA%D7%99%D7%AA](https://www.youtube.com/watch?v=rLyvUYbM82k&ab_channel=%D7%94%D7%97%D7%91%D7%A8%D7%AA%D7%99%D7%AA).

54. Nadia Ben Yousef, Suhad Bishara, Rina Rosenberg, "From Al-Araqib to Susiya: The forced displacement of Palestinians on Both Sides of the Green Line," *Adalah – The Legal Center for Minority Rights in Israel*, May 2013, [https://www.adalah.org/uploads/oldfiles/Public/files/English/Publications/Position\\_Papers/Forced-Displacement-Position-Paper-05-13.pdf](https://www.adalah.org/uploads/oldfiles/Public/files/English/Publications/Position_Papers/Forced-Displacement-Position-Paper-05-13.pdf).

55. United Nations Office of the High Commissioner of Human Rights, "UN experts condemn Israel's demolition of houses in Palestinian Bedouin community," November 19, 2020, <https://www.ohchr.org/en/press-releases/2020/11/un-experts-condemn-israels-demolition-houses-palestinian-bedouin-community>.





In a propaganda video, Regavim argues that Palestinians' territorial contiguity and European Union funding of Palestinian schools is a threat; therefore, Khan al-Ahmar should be destroyed.

"The hare-brained scheme for Khan al Ahmar" — Regavim

attention when it expanded its activities to include colonization efforts in the Naqab region and the oppression of the Bedouin community. Regavim has not only been engaged in efforts to target and displace Bedouin communities in the Naqab as a result of unauthorized construction; it has also worked to prevent improved access to resources and stability for these underserved communities, including targeting schools and access to electricity.

According to a report from *Arutz 7*, a prominent news channel affiliated with the national-Orthodox settlement movement,

Ayelet Shaked, the former Israeli Minister of Interior, collaborated closely with Regavim to formulate (re)housing policies for the Bedouin population in the Naqab.<sup>56</sup> In November 2021, Shaked proposed a plan to establish three cities exclusively for the Bedouins, which would have necessitated the forced displacement and relocation of 70% of the Naqab's Bedouin population in the Naqab to these designated areas. However, Ra'am, a political party, managed to block the plan by stipulating that the communities' consent was necessary for the plan's implementation.<sup>57</sup>

Following this, Shaked proceeded to

56. Hazakai Baruch, "מיבגר" מע מואיתב, דקש תלייא הביצהש מיאנתבו "מיבגר" מע מואיתב, *7 עורע*, "מיאודב מיבושיי השולש תמקה הרשיא הלשממה: דקש תלייא הביצהש מיאנתבו "מיבגר" מע מואיתב", November 11, 2021, <https://www.inn.co.il/news/530506>.

57. Baruch, "דקש תלייא הביצהש מיאנתבו "מיבגר" מע מואיתב".

establish five settlements in the northern Naqab region in what is perceived as a response to the failure of the displacement plan.<sup>58</sup> Four of these settlements were built exclusively for Jewish residents, with support derived from racist Israeli Admissions Committees law from 2011 which upholds this segregation. The remaining settlement was designated for Bedouins residents. Regavim published a statement of its approval on its website in response to this policy and praised the government, which was quoted by *Arutz 7*.<sup>59</sup> The fact that *Arutz 7* chose to quote the organization's on this matter indicates an understanding of its significant involvement in these developments.<sup>60</sup> This example not only highlights the racist character of Regavim's work to displace Bedouins and Palestinians on both sides of the Green Line, but also sheds light on the close collaboration between the organization and political actors.

In another example of targeting vulnerable Palestinian enclaves, Regavim, in collaboration with Himanuta, a subsidiary of the Jewish National Fund (JNF), filed a petition with the High Court of Justice to demolish houses in the village of Arab al-Ramadin village.<sup>61</sup> The petition against the village of Arab al-Ramadin was filed

in an attempt to have twelve structures demolished after years of Regavim's submission of letters to the Civil Administration, claiming that these buildings were being constructed illegally on lands belonging to Himanuta. Regavim cited an infringement of Himanuta's rights to their private property and accused Arab al Ramadin of constructing an "illegal outpost." While the court ultimately did not disagree with the unauthorized nature of the buildings' construction, the homes were not destroyed as it was found that Himanuta and the JNF owned only about 6% of the land in question.<sup>62</sup>

The significance of the court's 2017 decision lies not only in its rejection of Regavim's petition, but also in the exposure of Himanuta's involvement. Despite JNF's commitment to refrain from acquiring land in the West Bank, its subsidiary, Himanuta, has continued these efforts.<sup>63 64</sup> Moreover, this case highlights the connections between Regavim and other settler organizations engaged in attempts at property takeovers in the West Bank. This context is important, because it gives the first real insight into the absurdity of some of Regavim's legal claims, and reveals the true purpose behind the organization's legal actions. While Regavim accused the Bedouin community of making a

58. Ido Ben Porat, "Government authorizes five new towns in the Negev," *Arutz 7*, March 27, 2022, <https://www.israelnationalnews.com/news/324714>.

59. Regavim, "Regavim welcomes government decision to establish new communities in the Negev," March 27, 2022, <https://www.regavim.org/regavim-welcomes-government-decision-to-establish-new-communities-in-the-negev/>.

60. Baruch, "דקש תלייא הביצהש מיאנתבו ״סיבגר״ מע ןואיתב״.

61. Israeli Supreme Court, "Decision in High Court case 1509/17," April 10, 2019, <https://supremedecisions.court.gov.il/Home/Download?path=HebrewVerdicts%5C17%5C090%5C015%5Cm31&fileName=17015090.M31&type=4>.

62. Israeli Supreme Court, "Decision in High Court case 1509/17."

63. BADIL Resource Center for Palestinian Residency and Refugee Rights, "Land Ownership in Palestine/Israel (1920 – 2000)," *Al Majdal* vol. 5, March 2000, 13–16.

64. Peace Now, "KKL–JNF and its Role in Settlement Expansion," April 2, 2022, <https://peacenow.org.il/en/settler-national-fund-keren-kayemeth-leisraels-acquisition-of-west-bank-land>.

“illegal” land grab after a “legal” and “proper” land purchase and registration by Himanuta, the reality of the situation was that only a very small portion of the plot of land was under the control of Himanuta/JNF.<sup>65 66</sup> Over a course of years, the settlers’ rights organization made complaints and threats against the Civil Administration (“The Civil Administration is on vacation”), suggested that the Custodian of Government Property in Judea and Samaria was not fulfilling its duty, and ultimately accused the High Court of discrimination against Israeli settlers in favor of illegal Palestinian construction.<sup>67</sup>

Regavim’s aggressive legal strategy, in this case, inadvertently shed light on the clandestine activities of the JNF through its subsidiary, Himanuta, in the West Bank. This incident underscores a significant concern regarding the use of charitable funds by organizations like Regavim. Regavim has similarly targeted other villages for the purposes of demolitions and the forced displacement of entire communities, as well as targeting specific resources such as schools, roads, and renewable energy resources.<sup>68 69 70</sup> The use of funds donated to Regavim to facilitate and/or support potentially unlawful activities, such as forced displacement based on false premises, raises

critical ethical and legal questions. Such actions do not only contradict the purpose of charitable giving, they also contribute to the escalation of social and political conflicts. Therefore, it is crucial to ensure accountability and transparency in the allocation of charitable funds.

Furthermore, sources including Peace Now suggest that Himanuta and the JNF have studied Regavim’s strategies of lawfare to target Palestinian landowners, going as far as to hire a former Regavim employee – “Mr. Arad” – to carry out similar activities on their behalf. Peace Now argues that Mr. Arad practiced monitoring unauthorized Palestinian construction and exerting pressure for the demolition of these structures at Regavim before being recruited to carry out such activities as an employee of the JNF.<sup>71</sup> These tactics, supported by Attorney Avi Segal across organizations from Regavim to Himanuta, Ateret Cohanim, Amana, and Elad, are therefore expanding as common practice to – at the very least – advocate for home demolition and the displacement of Palestinian families.<sup>72</sup> This demonstrates the growing risk of racialized violence and dispossession becoming common practice within “charitable” organizations, and highlights the wider threat that deserves close examination.

65. Decision in case 1509/17.

66. Peace Now, “New Outpost on Land Where the JNF Evicted Palestinians Near Bethlehem,” October 5, 2019, <https://peacenow.org.il/en/new-outpost-on-land-where-the-jnf-evicted-palestinians-near-bethlehem>.

67. Adi Graciél, Avraham Binyamin, “The Roots of Evil,” *Regavim*, November 2018, p.7, <https://www.regavim.org/wp-content/uploads/2018/11/Roots-of-Evil-final.pdf>.

68. Regavim, “Legal Library,” <https://www.regavim.org/publications/legal-library/>.

69. Steven Davidson, “Israel’s demolitions surge: Schools become a primary target,” *AlJazeera*, May 11, 2023, <https://www.aljazeera.com/news/2023/5/11/israels-demolition-surge-schools-become-a-primary-target>.

70. Shezaf, “This Pro Settler NGO Has Been Shaping Israeli Policy for Years.”

71. Peace Now, “KKL–JNF and its Role in Settlement Expansion.”

72. Peace Now, “KKL–JNF and its Role in Settlement Expansion.”

# Political lobbying

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*"Our activities extend from the ground – literally – all the way up to the top level of Israel's legislative and judicial spheres, and beyond. Everything we do operates within the existing legal and public policy framework – but we aren't content with simply grappling with present realities. We work to create better realities, better frameworks in which the vision of a Jewish, democratic, sovereign State of Israel can flourish."*

*– Naomi Kahn, Director of Regavim's International Division*

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A significant portion of Regavim's functions are dedicated to the work of lobbying the Israeli government and politicians through, at best, unsubstantiated or misrepresentative reports and public pressure. The organization has successfully utilized government connections to further its political agenda, resulting in increasing restrictions on Palestinian life, from livelihood to human rights organizing. This section will relate to a few examples of Regavim's political lobbying, some of the subsequent policies, and the impact on Palestinian communities.

Notably, the organization's association with Naftali Bennet reflects a form of political engagement that poses a potential violation of U.S. charitable laws. Under Section 501(c)(3) of the Internal Revenue Code, U.S. charitable organizations are prohibited from participating in or intervening in any political campaign on behalf of, or in opposition to, any candidate for

public office.<sup>73</sup> <sup>74</sup> This prohibition includes not only direct financial contributions but also any activities that may have a positive or negative impact on a particular candidate. Illustrated further by examples below, Regavim's connection to Bennet and its public praise of his actions seem to have violated these guidelines.<sup>75</sup>

Beginning in 2018, Regavim targeted Palestinian organizations, particularly focusing on the Union of Agricultural Work Committees (UAWC). UAWC is a Palestinian non-governmental organization which works to support Palestinian farmers through programs and community activities. As a result, it is viewed as Regavim by a threat, maintaining Palestinian land rights and thereby subverting attempts to settle Israelis on lands in Area C of the West Bank. In 2018, Regavim published a position paper titled "The Roots of Evil", arguing that UAWC was part of a conspiracy to take over



"[W]e're more necessary as a lobbying organization now than ever. We're busier now than we've ever been...Many of the things that we've been proposing are now on the government's table...Many of the things that we discussed in the last four rounds of elections were actually incorporated in the coalition agreement that formed this government."  
— Naomi Kahn, director of the international division of Regavim, speaks at a March 2023 conference of The Hague Initiative for International Cooperation.

land in the West Bank.<sup>76</sup> Regavim also argued on social media that UAWC was a "terrorist organization" and that the Ministry of Defense should take action to label the organization as such.<sup>77</sup> This report, alongside years of lobbying efforts in the government alongside other settler organizations including NGO Monitor<sup>78</sup>, resulted

in the October 2021 decision by Benny Gantz, then Defense Minister in Naftali Bennet's government, to declare UAWC and five other Palestinian organizations to be "terrorist organizations", effectively halting their funding

73. "Lobbying," *IRS*, June 9, 2023, <https://www.irs.gov/charities-non-profits/lobbying#:~:text=In%20general%2C%20no%20organization%20may,loss%20of%20tax%2Dexempt%20status>.

74. In Canada, aside from a small portion of political activity (aimed at influencing Canadian policy), a registered charity is required to partake in exclusively charitable activity and not be involved in any political activities.

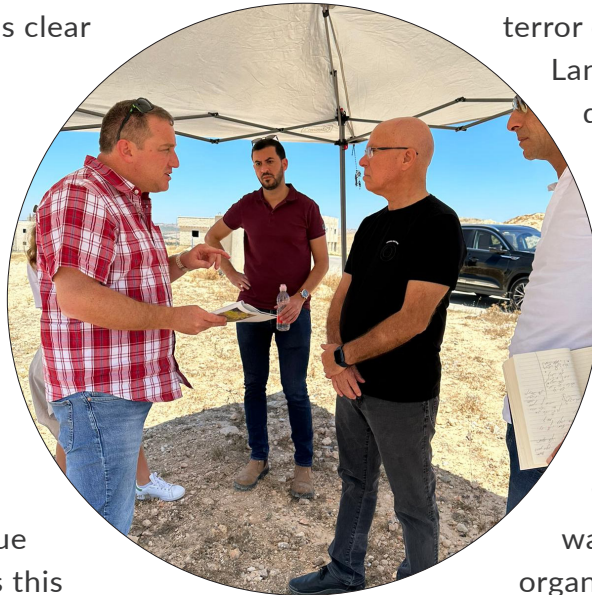
75. מִיבֵּגֵר תְּעוּנָה, "מיבגר תעונה רש" – Naftali Bennett, לך דובוכה לך" *Facebook*, December 6, 2019, [https://www.facebook.com/regavim/posts/3447978991941371/?locale=ms\\_MY](https://www.facebook.com/regavim/posts/3447978991941371/?locale=ms_MY)

76. Graciél, Binyamin, "Roots of Evil."

77. Regavim, "Non-profit that Supports UAWC Disbanded by Israeli Court; Regavim: 'Classify the "Palestinian JNF" as a Terror Organization.'" *Facebook*, January 29, 2018, <https://rb.gy/1rkm5>.

78. NGO Monitor, "Al-Haq and GLAN's Not-So-Subtle BDS Agenda: Analysis of Submission on 'Business and Human Rights in Occupied Territory,'" 10 September 2020, <https://www.ngo-monitor.org/reports/al-haq-and-glan-bds-agenda-business-human-rights/>; Tamás Orbán, "Israeli Watchdog: 'Overwhelming Evidence' of Ties Between EU-Funded NGOs and Terrorists," *The European Conservative*, February 5, 2023, <https://europeanconservative.com/articles/news/israeli-watchdog-overwhelming-evidence-of-ties-between-eu-funded-ngos-and-terrorists/>.

and impacting much of their work.<sup>79</sup> It has subsequently been made clear through independent investigations by an international accounting firm and the Australian government that there is no evidence to support this claim.<sup>80</sup> Close readings of Regavim's "Roots of Evil" demonstrate this clear lack of supportive evidence as well, demonstrating the unsubstantiated nature of the initial claim by Regavim. Nonetheless, the designation has remained, and significantly impacted the ability of these organizations to continue their work as before. As this declaration affected a number of the most prominent human rights organizations operating in the West Bank directly and indirectly, there has been a significant impact on the services each provides to civil society, leaving Palestinians more vulnerable to state and



settler violence.<sup>81</sup>

Notably, *Haaretz* journalist Nir Guntz interviewed MK Ruth Wasserman Landa from the Blue and White party, led by Benny Gantz, and inquired why the members of the six Palestinian organizations, regarded by them as terror organizations, were not arrested. Landa admitted that the ministry's decision relied on information from

MK Tzvika Foghel, Chairman of the Knesset's National Security Committee, joined Regavim for a field tour in the Negev in August 2023. According to Regavim's Whatsapp group chat, MK Foghel promised to cooperate on 'security issues' in the Naqab (Negev) in the future with Regavim.

"independent organizations," but was only willing to name one such organization, NGO Monitor.<sup>82</sup> According to Regavim, they are also involved in the designation.<sup>83</sup>

Thus it can be assumed that the Ministry of Defense relied on covertly gathered "intelligence" from civil society organizations, such as Regavim, exceeding the accepted

79. Adalah, "Israel refuses to reveal the evidence against the six Palestinian organizations it has designated as 'terrorist organizations'" January 6, 2022, <https://www.adalah.org/en/content/view/10515>.

80. Jonathan Kuttub, "An Update on Israel's Terrorist Designation for Palestinian Civil Society Organizations," *Arab Center Washington DC*, August 3, 2022, <https://arabcenterdc.org/resource/an-update-on-israels-terrorist-designation-for-palestinian-civil-society-organizations/>.

81. United Nations Office of the High Commissioner of Human Rights, "Israel/Palestine: UN experts call on governments to resume funding for six Palestinian CSOs designated by Israel as 'terrorist organisations,'" press release, April 25, 2022, <https://www.ohchr.org/en/press-releases/2022/04/israelpalestine-un-experts-call-governments-resume-funding-six-palestinian>.

82. Nir Guntz, "בושחל אל הפידעמ ינא?" *Haaretz*, October 25, 2021, <https://www.haaretz.co.il/magazine/2021-10-25/ty-article/.highlight/0000017f-e35a-d7b2-a77f-e35fcc0c0000>.

83. Regavim, "Mazal tov to us: Palestinians declare Regavim a terrorist organization!" *Facebook*, November 1, 2021, <https://www.facebook.com/regavimeng/posts/4652461508145773>.

boundaries of such organizations' operations. The responsibility of combating terrorism falls within the military's jurisdiction, and when a civil society organization involves itself in counterterrorism activities—even at an intelligence level—could be considered to be performing mercenary work.<sup>84</sup> This could categorize it as a paramilitary organization, in violation of the United Nations International Convention against the Recruitment, Use, Financing, and Training of Mercenaries. Furthermore, it raises concerns about the suitability and legality of using charitable funds for such activities under the stipulations of Section 501(c)(3) of the Internal Revenue Code and in Canada, the Income Tax Law.

In 2020, Regavim lobbied the defense establishment and the Civil Administration to modify the land registration process in the West Bank, thereby streamlining land acquisition for Israeli settlers. A significant triumph for Regavim materialized in February of 2022, as they compelled the Israeli High Court to grant the Israeli Ministry of Defense a 60-day window to provide justifications for the proscription on Israeli citizens purchasing land in the West Bank<sup>85</sup>, which is formally under military occupation by Israel. This effort, understood in conjunction with Regavim's sustained efforts to destroy existing Palestinian villages, their infrastructure, and ultimately forcibly displace entire communities, supports a racist and colonial endeavor by which one group of people



August, 2023 — Regavim and the Gush Etzion Land Division hosted a field tour for MK Limor Son Har-Melech. The tour focused on the 'illegal Arab takeover' of land and a particular focus on the Beit Fajjar quarry.  
*Photo via Regavim*

are granted control over land and resources to the detriment of another group.

Another example of Regavim's overtly racist campaigns involves the public initiatives aimed at demolishing Bedouin schools in the Naqab (Negev). In March 2013, Regavim's appeal to shut down three elementary schools in Wadi al-Na'am, an unrecognized village in the Naqab, was rejected by the Supreme Court.<sup>86</sup> The petition was understood locally as part of an

84. United Nations General Assembly, "International Convention against the Recruitment, Use, Financing and Training of Mercenaries," res.44/34, December 4, 1989, <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-convention-against-recruitment-use-financing-and>.

85. Shiloh Fried, "עקרק שוכרל מידוהים ענומש קווחה דגן ץ"גב", *Makor Rishon*, February 15, 2022, <https://www.makorrishon.co.il/news/457979/>.

86. Adalah, "Supreme Court rejects Regavim petition to close 3 Arab Bedouin elementary schools in Wadi el-Na'am," March 21, 2023, <https://www.adalah.org/en/content/view/7989>.



July, 2023 — Regavim participated in the Knesset's Foreign Affairs and Defense Committee, which, according to their WhatsApp group chat, focused on 'the illegal Palestinian takeover of the open spaces in Judea and Samaria'. Judea and Samaria is the colonial framework used to describe Palestinian lands in the West Bank.

effort to support the government-imposed plan to displace the Bedouin inhabitants from their lands in order to move them to more densely populated areas.<sup>87</sup> Regavim argued that the schools were unsafe due to their proximity to factories in Ramat Hovav, a nearby town. This falsely benevolent argument, which places the responsibility of safety on the Bedouin community rather than the factory owners or the state itself, illustrates the discriminatory nature of Regavim's actions and underlying intentions.

Moreover, Regavim justified the demolition of these schools in Wadi al-Na'am by asserting that these educational institutions offer substandard learning environments, lack proper hygiene, are

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87. Adalah, "Supreme Court rejects Regavim petition."



inaccessible, and lack electricity. These arguments rely on racist and orientaling stereotypes of Bedouins as backwards, underdeveloped, and requiring assistance from the Israeli state to “modernize”. This stereotype is reflected across Regavim’s representations of Bedouins and Palestinians across the organization’s work, which dedicate significant resources to presenting social concerns such as gender equality as solely or primarily relating to Bedouin communities.<sup>88</sup>

In 2016, the State of Israel finally recognized Wadi al-Na’am. However, the residents found the village plan imposed by the Israeli authorities unacceptable. By 2019, under presumed pressure from Regavim, the planning committee declared that the villagers must accept the plan as a prerequisite for school recognition.<sup>89</sup> However, the human rights organization Bimkom intervened and successfully obtained approval for the schools, independent of the village plan, thwarting Regavim’s efforts in this case.<sup>90</sup>

More recently, Regavim organized a conference on March 14th 2022 called “The conference of the challenges of Zionism.”<sup>91</sup> During the conference, the organization hosted Knesset Member Amichali Shikli from the Yamina Party, who voted against his

own party because they agreed to be in the same coalition with an Arab party, Ra’am. He has since been ousted by the Yamina Party.<sup>92</sup>

The conference hosted a purely strategic discussion about how to foil European-funded projects to assist Palestinian construction and agriculture, by designating specific Palestinians individuals and organizations as terrorists and by taking over strategic land plots.<sup>93</sup> This follows the tactic Regavim has taken since its 2018 publication against UAWC, and its work to disrupt the services going to Palestinians through this designation. The continued efforts in service of this tactic, despite the common knowledge that there is no evidence to support such claims, is an important indicator of Regavim’s commitment to the disruption of Palestinian lives and community over any commitment to truth or charitable endeavors.

The utilization of charitable funds in such endeavors raises legal and ethical concerns, particularly as these actions contribute to forced displacement and exacerbate social and political conflicts. Such activities deviate from the intended purposes of charitable giving under Section 501(c)(3) of the Internal Revenue Code.

88. Regavim has dedicated significant resources to publishing position papers which misrepresent Bedouin communities and their history as a whole. With regards to the issue of gender equality, Regavim published a 2018 position paper titled “PolygaMeToo” which, while claiming to address the issue itself, only addresses polygamy in Bedouin communities.

89. Liat Schlesinger, “עבש ראבמ תוקד שמח, ישילש מלוע: ונרפס תיבב אל,” *Makor Rishon*, February 9, 2013, <https://www.makorrishon.co.il/nrg/online/54/ART2/434/490.html>.

90. Bimkom, “מען לא ידאו,” <https://bimkom.org/%D7%A0%D7%A2%D7%9D/>.

91. Regavim, “ילקיש יחימע כ”ה – תונויצה ירגתא סנכ,” *Facebook* (Live), March 14, 2022, [https://www.facebook.com/watch/live/?ref=watch\\_permalink&v=1113986632755719](https://www.facebook.com/watch/live/?ref=watch_permalink&v=1113986632755719).

92. “Ex-Yamina MK Amichai Chikli vows to remain in Knesset after being declared a defector,” *Cleveland Jewish News*, April 27, 2022, [https://www.clevelandjewishnews.com/jns/ex-yamina-mk-amichai-chikli-vows-to-remain-in-knesset-after-being-declared-a-defector/article\\_ffe3a43b-652e-5015-b496-f75f89711cc0.html](https://www.clevelandjewishnews.com/jns/ex-yamina-mk-amichai-chikli-vows-to-remain-in-knesset-after-being-declared-a-defector/article_ffe3a43b-652e-5015-b496-f75f89711cc0.html).

93. Regavim, “ילקיש יחימע כ”ה – תונויצה ירגתא סנכ.”

# Public Communications

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*“The Palestinian people is an invention that is less than 100 years old.”*

*- Regavim's founder and Israel's current Finance Minister Bezael Smotrich*

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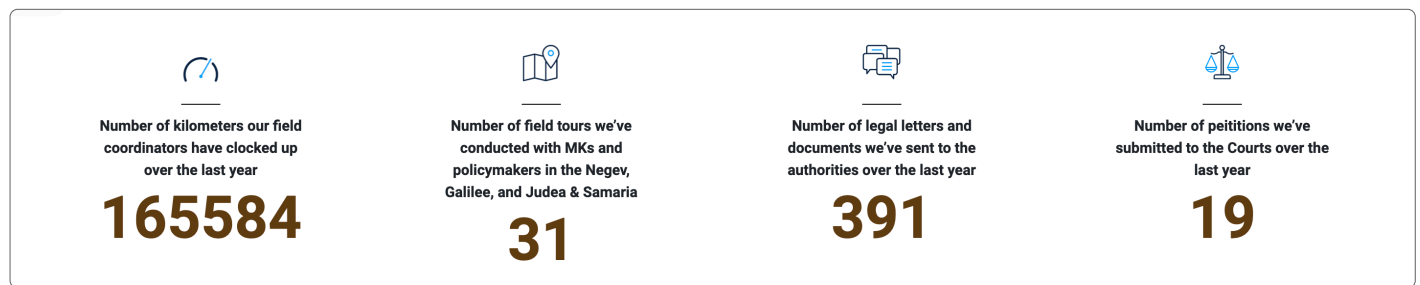
Regavim extensively engages in lobbying the Israeli government and advocating for the implementation of Israeli sovereignty, a claim that conventionally falls within the domain of state entities rather than civil society organizations. Regavim uses its public communications – its website, published reports, social media, and the like to present and support many of its lobbying materials, searching for support from the Israeli public as well as creating an archive of materials that underpin the inverted rhetoric the organization employs. While Regavim employs some sophisticated legal analysis – for example, supporting the establishment of Israeli settlements in the 1967 Occupied Territories, including the West Bank – it also relies on ahistorical representations of the situation on the ground to assert many of its arguments.

Importantly, across its two primary languages of communication, English (international) and Hebrew (local), the organization occasionally uses differing descriptors in order to appeal to its two audiences. Regavim often does not use direct, or literal, translation. Notably, for instance, Regavim's Hebrew

website claims to have organized 65 tours for Knesset members, while its English website mentions only 31 tours. This disparity in factual representation and language deviation has the potential to mislead American people, and donors, regarding the extent of funds allocated to lobbying activities. Furthermore, Regavim regularly uses its communication tools to completely invert the existing regime of power,

The video mentions the existence of a Knesset “shdula” or “interest group,” comprising members of Knesset from different parties who collaborate to advance a shared agenda. Regavim claims that this interest group, named the “Land of Israel Interest Group”, closely monitors and cooperates with its organization.

The Land of Israel Interest Group is a sizable non-partisan group, consisting of 55 Knesset



*Because Regavim is reliant on financing and base-building from the far-right, they are very public about the campaigns of indigenous displacement and erasure. Pictured here a screenshot of their achievements in 2023. Accessed August 28, 2023.*

representing Palestinians as “settlers” building “outposts” in their own lands, while Israeli settlements are referred to as “communities”.

Regavim’s Hebrew website previously featured an autoplaying video which shows Regavim members, including Meir Deutsch, discussing the organization’s activities and achievements.<sup>94</sup> There are four aspects of this content that stand out as possible contraventions of international charitable giving. These potential infractions may bring into question the legality and appropriateness of Regavim’s use of charitable funds for such purposes.

members (out of 120). According to a report by Israeli news source YNet, the interest group collaborates with non-parliamentary organizations affiliated with the right wing, namely “My Israel,” “Regavim,” “The Security Experts,” and “Im Tirzu.” Additionally they work in collaboration with settlement mayors.<sup>95</sup>

The strong association between Israeli politicians — including former Regavim staff — as well as settler leaders and the organization, combined with the tours it arranges for Knesset members and foreign diplomats, and political appeals to the Israeli High Court against government policies, underscores Regavim’s

94. Regavim, “קצח וקיצחת, הכך תנש התארנ ונלש 2021 / מיגרב טבשב ו”ט / בפשתה טבשב ו”ט,” *Youtube*, December 28, 2021, <https://www.youtube.com/watch?v=OFjJe2kFfQs>.

95. Moran Azulai, “לארשי קרא תלודשב היצילאוקל תוגיצנ: קורטסו שיק דצל רברואו ומליס,” *Ynet*, July 11, 2021, <https://www.ynet.co.il/news/article/h1ubaxuau>.

significant involvement in advocacy efforts within the Israeli legislative body.

In addition to its involvement with the Land of Israel Interest Group, Regavim proudly claims to have initiated a campaign against the “Electricity Law,” which was eventually passed in the Knesset.<sup>96</sup> According to Regavim, the law

international financing for Palestinian projects is both illegitimate and illegal is a recurring narrative in Regavim’s lobbying and activism campaigns. This is absurd in itself, as foreign funding for the construction of a building alone does not make it a worthy target for demolition. However, considering the claim in light of the

"Regavim’s entire body of work is dedicated to stripping resources from Palestinian communities to ensure their displacement. This includes the language it uses to describe communities, the laws it lobbies for and against, and the lawfare campaigns it carries on over years and years. The worst part is that it is incredibly clear about its intentions – it tells us time and time again that all of its work is to maintain a state which benefits one group of people, Israelis, over Palestinians." – Lara Kilani, Good Shepherd Collective

was supported by Ra’am (the United Arab List) led by Mansour Abbas. This claim is accurate, as Raam did promote this law as part of an effort to provide essential services to the unrecognized Bedouin villages in the Naqab. However, the fact that Regavim launched a campaign specifically targeting a political party positions it as an actor on the parliamentary stage, potentially violating the IRS regulations for charitable organizations.

Regavim claims responsibility for a campaign aimed at dismantling Palestinian schools in the West Bank, citing the foreign funding these schools receive as the reason for targeting them. The rationale which asserts that

amount of foreign funding Regavim receives, as well as the fact that the organization boasts an entire “international division”, provides an additional layer of absurdity.<sup>97 98</sup> While this does not constitute a legal argument against them, it calls into question the ethical consistency of their activities, particularly as they are funded by charitable donations.

Regavim has claimed responsibility for halting a project in Wadi al Noaima (Nahal Mahokh), which they allege was intended to be funded by a German bank. The right-wing media in Israel has portrayed this project as a garbage disposal site exclusively designated for Palestinians, and Regavim has been successful in preventing its

96. “Israel: Controversial electricity bill passes into law,” *i24 News*, January 5, 2022, <https://www.i24news.tv/en/news/israel/politics/1641384544-israel-controversial-electricity-law-passes-into-law>.

97. Regavim’s budget includes a significant portion of foreign funding each year, with at least 25% of its 2021 budget (the most recent annual budget publicly available) coming from foreign donors.

98. Regavim, “Divisions,” <https://www.regavim.org/divisions/>.

implementation. The German Bank for Development, in collaboration with the German development agency GIZ was involved in this initiative.

The landfill in question plays a crucial role in the Palestinian civilian infrastructure and holds immense significance. Initially, the Israeli Civil Administration (ICA) granted approval for its establishment.<sup>99</sup> However, under the pressure exerted by Regavim, a condition was introduced, mandating that the landfill could only proceed if it also served the needs of neighboring Israeli settlements, which are deemed illegal. Due to legal restrictions, German institutions were compelled to withdraw their support, rendering the landfill project unfeasible and leading to its cancellation. This development raises concerns about the potential complicity of German institutions in facilitating a war crime, underscoring the gravity of their decision to discontinue involvement.

It is worth noting that this approach employed by settlers extends beyond landfills and encompasses other vital infrastructure projects, such as water treatment facilities. Such actions demonstrate Regavim's active role in the construction and provision of infrastructure for the settlements, while simultaneously undermining the fundamental rights of Palestinians and the denial of access to these essential resources.

A new form of media that Regavim has turned to in order to expand its audience are

books. Regavim has recently been promoting a book arguing that Bedouins have established their own state in the Naqab by the title of *Bedouistan*.<sup>100</sup> The book calls to dismantle that purported state. This narrative has become a significant focal point of Regavim's work, and the website presents Regavim as a proponent of Israeli sovereignty rather than as a traditional NGO. The publication of this book, alongside Regavim's numerous reports which only focus on Bedouins and Palestinians as defying and/or attacking "Israeli sovereignty" shows the racialized nature of Regavim's work. No such publications exist by Regavim making any critique of any group, settlement, town, or similar community of Jewish Israeli society.

Regavim organizes frequent "trips" or tours to locations in the West Bank and the Naqab. These trips are simultaneously presented as tourists' strolls to enjoy nature and the view, as well as a means to "protect" the land from "Arab invaders." By organizing these patrols disguised as leisure trips, Regavim is simultaneously bringing armed "tourists" into sites like Hebron, intimidating the local Palestinian population while espousing a highly problematic, racist, and ahistorical narrative of the land. In one post from Hebron, a Regavim spokesperson invited Jewish people to come to Hebron and see recently discovered archaeological ruins near the Ibrahimi Mosque/Tomb of the Patriarchs before they are covered.<sup>101</sup>

99. Ben Hattem, "West Bank landfills acting as pits for foreign aid," *Middle East Eye*, February 12, 2015, <https://www.middleeasteye.net/fr/essays/landfills-become-pits-foreign-aid-west-bank-1373293510>; additional information available here: Nidal Atallah, "Palestine: Solid waste management under occupation," *Heinrich Böll Stiftung*, October 7, 2020, <https://ps.boell.org/en/2020/10/07/palestine-solid-waste-management-under-occupation>.

100. Regavim, "Bedouistan: How the State of Israel is Losing the Negev," March 9, 2022, <https://www.regavim.org/introducing-bedouistan-in-english/>.

101. Regavim, "ונתיא לייטל ואוב ?ןורבחב מתייה הנורחא מעפב יתמ!" *Facebook*, April 17, 2022, <https://fb.watch/cCu6xIN0p8/>

# Finances

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*"It is important to understand that the fight over the land of Israel did not end in 1948...Our job is explaining to the public that the fight over the land of Israel is continuing and goes on every day. It is happening today in the plowing of fields, in the building of houses, and in the courts. It is the same fight but on different fronts." - Meir Deutsch, Director of Regavim*

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Regavim benefits from tax deductible donations in Israel as a registered nonprofit. According to the *Israeli Guidestar*, Regavim has successfully filed its financial reports for 2013 to 2022. The organization received operational approval for its operations for the years 2013 to 2024 and has been granted tax exemption for the years of 2015 to 2024.

A comprehensive review of all of the financial documents available on the Israeli Guidestar has been conducted, encompassing the years 2012 to 2021. Financial Reports for 2008 to 2011 were conducted by the organization Peace Now and are available on its website. Below we will give a brief overview of Regavim's known fiscal sponsors, as well as what can be garnered from the organization's available financial documents. We draw attention not only to the mechanisms by which Regavim receives donations, but also highlight the inconsistencies in Regavim's reported budget and potential areas for future investigation by the relevant authorities.

## **Fiscal Sponsors**

Since 2006, Regavim has had four known U.S.-based fiscal sponsors: the Central Fund of Israel, the Israel Independence

Fund, the One Israel Fund, and the Asor Fund (JGive). All four of these organizations are registered as 501(c)(3)s in the United States, and therefore benefit from the associated privileges as charities. Regavim, as the sponsored organization, is able to receive tax-deductible donations from U.S.-based donors. At the same time, U.S. donors are able to deduct money from their taxes according to the donations they make to Regavim's work.

At the time of this report's publication, only two of these organizations are known to be supporting Regavim as fiscal sponsors: Asor Fund and the Central Fund of Israel. It is not possible to know exactly how much support Regavim has received from these organizations, or continues to receive, as much of the information about donors has been redacted from the financial forms available online.

In Canada, Regavim is able to provide tax receipts to donors through a relationship with the Canadian charity Mizrachi Organization of Canada.

### Annual budget

Year	Total Income (NIS)	Expenses (NIS)	Donation (NIS)	From Abroad (NIS)
2012	4,136,577	3,311,319	1,724,397	No data
2013	4,716,083	4,057,271	2,550,632	No data
2014	4,609,220	4,343,975	2,153,690	No data
2015	5,626,373	3,963,550	3,530,381	No data
2016	5,618,960	3,485,872	4,711,986	No data
2017	5,195,052	4,388,529	3,795,093	No data
2018	5,043,237	4,798,913	3,802,365	1,251,805
2019	4,829,385	3,521,115	3,971,606	319,603
2020	4,484,081	4,192,174	3,401,466	935,550
2021	5,286,168	5,188,517	4,026,186	No data

*Data accessed through publicly available documents.*

In the chart above, the total donations received, including both abroad and local contributions, are recorded separately. However, both are included in the total income.

### Redacted Donors

In 2012, Regavim reported a total of 8 donations, with only two of them redacted. The donations received were as follows: ₪500,000 from Binyanei Bar Amana (a private limited liability company); ₪295,998 from the Canada Magbit; ₪100,000 from Har Kabir LTD (a private limited liability company); ₪60,000 from a redacted donor; ₪40,000 from Noten Bracha in Jerusalem (Israeli NGO); ₪29,299 from the Central Fund of Israel; ₪25,000 from a redacted donor and ₪20,013 from the Union of Orthodox Jewish Congregation of America. We include this to point out the sharp contrast with future years, through which more and more of Regavim's donors' names were redacted, obscuring information about their funding.

For the fiscal year of 2013, Regavim reported a total of 11 donations. However, the names of all

but three donors' names were redacted. The identified donors were: ₪25,000 from A.R.B.D Investments LTD (a private limited liability company); ₪300,000 from Binyanei Bar Amana (a private limited liability company) and ₪461,592 from the Israel Independence Fund of Roman Abramovich. The remaining donors' names were redacted.

In 2014, Regavim reported a total sum of donations amounting to ₪2,153,690. The financial report provided specific details regarding some donors, including: ₪512,048 from the Gates of Mercy<sup>102</sup>, ₪200,000 from Binyanei Bar Amana (a private limited liability company), ₪180,000 from Israel Analytics Consulting (a private company), ₪140,846 from the Central Fund of Israel, ₪77,820 from Katz consulting LT (private company) and ₪38,181 from a donor whose identity has been redacted.

In 2015, Regavim reported 11 donations, but the details about the donors were not disclosed except for the respective amounts. The Israel Independence Fund, associated with the well-known Russian oligarch and politician Roman Abramovich, was connected to an amount of ₪677,400, the Gates of Mercy Foundation with ₪459,700, Binyanei Bar Amana (a private limited liability company) with ₪400,000, the Central Fund of Israel with ₪325,800, Tene Omarim Projects 2007 Construction and Trade (a private limited liability company) with ₪100,000, and One Israel Fund with ₪55,178.

In 2016, Regavim once again presented a report on the 11 biggest donations, but unfortunately provided almost no information about the donors themselves. The donation sums, however, were provided. The second

report, which did not include the financial details, happened to reveal the source of the last and largest donation of ₪752,920, attributing it to the Israel Independence Fund associated with Roman Abramovich.

In the report for 2017, Regavim's record of its 12 biggest donations are blank. The report includes only the donation amounts without any additional information, such as the donor's name, origin (whether an Israeli or from abroad), or whether any redaction requests were made. The donation amounts are as follows (in NIS): (1) ₪749,300 (2) ₪360,000; (3) ₪329,043; (4) ₪200,000; (5) ₪482,200; (6) ₪405,000; (7) ₪200,000; (8) ₪50,000; (9) ₪88,475; (10) ₪62,625; (11) ₪28,208; and (12) ₪25,000.

In 2018, Regavim identified five key donors, all of whose names have been redacted. Among the donors were two Israeli citizens, one who donated ₪360,00 and the other ₪207,000. Additionally, a foreign institution from the U.S., possibly the Central Fund for Israel, donated ₪970,375. An Israeli NGO also made a significant contribution of ₪546,340, while an Israeli company donated ₪250,000. In 2018, Regavim also received a core subsidy from municipalities, totalling ₪462,500 and another ₪778,372 from municipalities in exchange for services.

In 2019, Regavim identified four primary donors. The first was a U.S.-based organization (possibly the Central Fund for Israel, though the name has been redacted) which donated ₪1,804,175. Secondly, there was an Israeli NGO that contributed ₪132,950 (name also redacted). Additionally, an Israeli individual

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102. It should be noted that this organization seems to have had its charitable status revoked in Canada as of the time of this report's publication. According to one Charity Intelligence Canada, it has been revoked since at least 2019. See resources below for additional information.



made a substantial donation of ₪470,000, while a U.S citizen donated ₪239,632. In 2019, Regavim also received a core subsidy from municipalities of ₪427,500 and another ₪319,602.65 from municipalities in exchange for services.

Regavim identified three main donors in the 2020 fiscal year. One of the donors was a U.S.-based organization (likely the Central Fund for Israel, although the name has been redacted). The organization donated ₪854,450 and notably did not request that their name be redacted, meaning that the decision was made to do so by Regavim. Additionally, two individuals made donations: an Israeli citizen contributed ₪360,000, and a U.S. citizen donated ₪784,419. Both of these individuals requested that their names be redacted.

In 2020, Regavim reported receiving ₪21,750 from the state and ₪366,874 from local municipalities, but it also received ₪693,990 from local municipalities in exchange for specific services provided by Regavim. This indicates that Regavim's core functions are subsidized by the State of Israel and by local municipalities (most likely settlements).

Regavim's most recent financial report, from 2021, identifies five donors – three "corporations" or institutions, and two individuals. The largest donor, a U.S. based organization (likely the Central Fund of Israel) which was anonymized by Regavim, donated a total of ₪1,350,750. The other two donations from institutions come from Israeli organizations, both of which were anonymized by Regavim: ₪171,109 and ₪117,999. Two donations from individual donors are also listed. One donation of ₪200,000 came from

an Israeli citizen who was anonymized at their request; the second donation of ₪114,385 came from an American citizen who was also

**"Regavim redacting and hiding donor information should be a huge red flag for regulatory bodies. These should be key talking points for activists." – Bana Abu Zuluf, Good Shepherd Collective**

anonymized at their own request.

Notably, the report from 2021 de-emphasizes both donations from abroad and income received for services to local authorities, though in the previous year these two forms of income jointly made up more than 35% of the organization's total budget. Compared to the previous year, Regavim reported only ₪373,245 in revenue from state and local authorities, a paltry 7%. Instead, the report suggests that 76% of the organization's budget for 2021 was made up of donations from within Israel – a leap of more than ₪1.5 million in one year – with much of the remainder coming from "other sources".<sup>103</sup> Further inspection indicates clearly that these other sources are primarily made up of foreign donors. This shift in reporting may indicate an attempt by Regavim to distance itself from funding by settlement councils and the government itself in favor of an attempt to appear to be funded by individuals or "grassroots". Furthermore, it suggests that Defund Racism and other campaigns to inspect and disrupt international charitable funding to Regavim are, at the very least, impacting the

103. Regavim, "Financial Data," גיידסטאר, July 2022, <https://www.guidestar.org.il/organization/580460319/finances>.

organization's financial reporting.

### Financial Gaps

As of 2020, Regavim had 30 employees. It is noteworthy that though the number of employees has increased over the years, the organizational income and expenses have actually been declining since 2015. It is possible that Regavim is being used as a channel to finance or sponsor other, less transparent organizations. Otherwise, this money may be financing the hiring of for-profit law firms to represent it in the Israeli courts.

The lack of transparency raises important questions, particularly as Regavim is closely connected to many politicians as well as other settler organizations. For example, according to Regavim's 2017 financial report, a number of the organization's board members are either serving on the board or are senior members of five organizations: The Fund for Developing North Talmon; Mitzpe Khorsha; Mital Hashamayim Umishmaney Haaretz; Garin Aliah; Beit El Community Center. These organizations are all connected with the ongoing colonization of the West Bank. Notably, starting in 2018 Regavim stopped reporting about the connections between its senior employees and other settler NGOs, while reports as early as 2014 list the same organizations as well.

This question deserves its own thorough investigation by authorities who can audit the organization and request unredacted donor information as well as thorough financial reports.

A December 2015 report on Regavim's finances by Peace Now found that between the years 2006 and 2013, only 14.7% of Regavim's

funding was fully transparent, whereas 59.16% was partially opaque, and 32.1% was completely secret. Furthermore, the subsidies paid to Regavim – a sum of ₪9.79 million – were also completely secret.<sup>104</sup>

Peace Now also reported gaps in Regavim's financial reports, with the following amounts unaccounted for:

2011 – ₪427,000

2012 – ₪672,000

2013 – ₪548,000

The total between these three years amounts to ₪1.647 million. Unless this amount can be accounted for through hundreds of donations smaller than ₪20,000, Regavim is obligated to report the source of the donations.

### Salaries

Another noteworthy issue relates to Regavim's salaries. In 2012, 2017, and 2018 Regavim had one employee who was paid more than three times the average salary in Israel for that year. These are the amounts:

2012 – ₪367,554

2017 – ₪339,123

2018 – ₪368,927

It is uncommon for Israeli charities in general to pay such a high salary unless they are very large, which Regavim is not. Furthermore, this salary is not consistent throughout the surrounding years and is significantly higher than the four other highest salaries within the organization. This indicates the possibility of corruption, and should be more closely inspected.

104. Ilan Shizaf, "ילארשיה ימייה מע תוהוזמה תותומע עשת לש ותופיקשו וומימה תורוקמ," *Peace Now*, December 2015, <https://peacenow.org.il/wp-content/uploads/2015/12/december15.pdf>.

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# Conclusion

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*"The time for action is now. Palestinians facing the violence of evictions, land theft and home demolitions are calling on the solidarity movement to take on these settler organizations in the courts, head-on." – Mohammad Zawhara, PSCC*

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This report has offered the initial questions and recommendations for what should be a larger and more in depth investigation by authorities who have the resources and power to do so, such as the IRS and the Attorneys General in U.S. states where Regavim's fiscal sponsors are located. In Canada, the Canada Revenue Agency bears the responsibility to ensure that funds are not going to Israeli settlements. Regavim's mission and work itself seems to violate the very nature of charitable work – surveilling communities, lobbying for the destruction of schools, and taking vulnerable villages to court over false claims. But beyond the racist and discriminatory mission of the organization, there are other problematic elements that deserve further investigation, including Regavim's connections to politicians, its lobbying work, and its obstruction of information relating to donations.

Under New York charitable law, for example, where the Central Fund of Israel is registered as a charity, such organizations must be engaged in education, the relief of poverty, cultural programs, the promotion of health and research to cure diseases, or other purposes that benefit the community. In Canada, registered charities must use their resources for one or more of the

following: the relief of poverty, the advancement of education, the advancement of religion or other purposes that benefit the community. In contrast, as this report has demonstrated, Regavim works for the destruction of children's access to education, and calls for the impoverishment of communities through demolitions and displacement – also draining communities, like Arab al Ramadin, of time and resources through needless court cases. The intangible impacts of this work, such as the psychological ramifications on children threatened with the loss of their homes or schools, is unquantifiable.

We urge allies in the United States, Canada and elsewhere to find ways to make use of this report to disrupt the flow of financial support to Regavim and other settler organizations, instrumentalizing the information that has been provided here. Challenging the work of these organizations does not only have an impact on the financial support they receive; it would have an impact on the ground immediately, through the constriction of resources to carry out the tasks we have outlined above. You can engage with existing efforts to enforce charitable law by visiting [defundracism.org](http://defundracism.org).

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