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# Dispossession through Bureaucracy in Occupied Jerusalem

February 2023

REPORT

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Flash Report

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## Introduction

In occupied East Jerusalem, repression and forced displacement are daily realities, enacted through a multitude of Israeli state mechanisms working in tandem to drive Palestinians out of their city and crush resistance to Israel's settler-colonial project. In addition to overt and direct violence - exemplified by home demolitions, policing, surveillance, and regular assaults and arrests - Israel also deploys less visible, albeit equally repressive tactics of control, rooted in what can be termed bureaucratic violence.

Bureaucracy is often framed as a mechanism to enhance institutional and organizational efficiency in the service of wider society, but as this study by Who Profits shows, bureaucracy can also function as a means of organizing a broad assemblage of processes to achieve political interests. In this report, Who Profits sheds light on Israel's weaponization of bureaucratic processes to advance its long-standing agendas of illegal settlement expansion and Judaization, while at the same time controlling, concentrating and minimizing the Palestinian presence in Jerusalem. In this report we examine corporate complicity in two prime "bureaucratic-cum-displacement" processes explicitly targeting Palestinians in East Jerusalem - the revocation of the permanent residency status of Palestinian-Jerusalemites and the land registration proceedings, known as the Settlement of Land Title initiated in 2018.

In both cases, Palestinian Jerusalemites must "prove" their right to reside in their city, as well as prove ownership of their properties to the occupying power through bureaucratic registration processes that are inherently convoluted, vague and costly. These processes are facilitated by the complicity of private corporations contracted by Israeli authorities and are presented in this report. The corporations are: Moran Investigations, Tshuva Hakirut and Betihut Enosh in the residency-related procedures, and Geoda in the land registration procedure.

# Methodology

For this study, Who Profits relied on publicly-available publications, news articles, governmental plans and decisions, Freedom of Information requests to the Ministry of Justice and the Israeli National Insurance Institute (NII), company records, and their files in the Israeli Registrar of Companies, tenders published by both bodies in search of companies and tender results and contracts with the companies examined, interviews with Palestinians working against these policies and the reports of various human rights organizations monitoring and researching on both topics.

Prior to publication, Who Profits contacted all the companies mentioned in this flash report to share the main findings presented here and requested a response. By the time of publication, none had been received.

## Residency Under Occupation

### Background

In the aftermath of Israel's occupation and the subsequent annexation of East Jerusalem in 1967, some 66,000<sup>1</sup> Palestinians out of 75,000<sup>2</sup> were not expelled from the city. As part of its broader and illegal de-jure annexation policies, Israel as the occupying power, conferred upon those Palestinians who remained steadfast in their city a "permanent residency" status under the 1952 Entry into Israel Law.<sup>3</sup> Those who were forcibly displaced are still denied the right of return to Jerusalem. By imposing a permanent residency status, the Israeli authorities not only established what would become a tool of displacement used against Palestinian Jerusalemites but also created a framework to prevent both refugees and the internally displaced population - including people displaced to areas in the West Bank who are excluded from the newly-formed municipal boundaries of Jerusalem - from returning to their city in violation of, inter alia, Article 13(2) of the Universal Declaration of Human Rights<sup>4</sup> and Article 12 of the International Covenant on Civil and Political Rights.<sup>5</sup>

The permanent residency status conditions Palestinian presence in the city and structures this status as both revocable and precarious. Permanent residency status allows Palestinian Jerusalemites to remain and work in their city and entitles them to some social and economic benefits granted by the Israeli National Insurance Institute (NII), such as health insurance, welfare benefits for disability, unemployment, and elderly and child allowance, among others.<sup>6</sup> Yet this status can also be revoked under certain circumstances, including acquiring citizenship or permanent residency in another country, leaving the country for seven years - the so-called "center of life" policy, and the breach of allegiance to the state, which is detailed below. Palestinians who are stripped of this status lose access to social benefits and are unable to work legally, move freely, access education, and/or issue birth certificates

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1 Btselem and HaMoked. (1998). [The Quiet Deportation](#).

2 Levy Economics Institute. [Comparison Between 1967 \(Israeli\) and 1961 \(Jordanian\) Census](#). [Dataset].

3 Ibid.

4 United Nations. (n.d.). [Universal Declaration of Human Rights](#).

5 OHCHR. (n.d.). [International Covenant on Civil and Political Rights](#).

6 HaMoked. (1998). [The Quiet Deportation](#).

for their children.<sup>7</sup> According to data from the Ministry of Interior, between 1967 and 2020, the Israeli Ministry of Interior revoked the residency status of 14,701 Palestinian Jerusalemites.<sup>8</sup>

Under the Citizenship and Entry into Israel Law (Temporary Order),<sup>9</sup> passed by the Knesset in 2003 which is renewed annually and was reenacted in 2022, the Palestinian residents of Jerusalem cannot pass the permanent residency status to their spouses if the latter are from the West Bank or Gaza, or countries defined in Israeli Law as enemy states. Children of permanent Jerusalem residents do not automatically inherit their parents' status and have to be registered to achieve residency and the rights it entails. Child registration for Jerusalemites is a cumbersome process that can take years, especially if one of the parents is not a Jerusalem resident, or if the child is born outside of Jerusalem.<sup>10</sup> Thus, the restrictions on who can be granted this status also serve to enhance Israel's long-standing policy of fragmenting and dividing Palestinian communities, tearing families apart, and controlling the most intimate details of their lived realities.

Since 1995, the Israeli Ministry of Interior has been relying on an expanded interpretation of the Entry into Israel Law and has been implementing a so-called "center of life" policy to support this.<sup>11</sup> Under the policy, to retain their residency status, Palestinian Jerusalemites must periodically "prove" to the Israeli Ministry of Interior that Jerusalem has been their "center of life" for the previous seven years. The inability to comply with this policy renders Palestinians vulnerable to expulsion from Jerusalem by Israeli authorities at any given moment.

In addition to the "center of life" policy, in March 2018 the Israeli parliament amended the 1952 Entry into Israel Law, introducing a clause that authorizes the Ministry of Interior to revoke the permanent residency status of Palestinian Jerusalemites on the grounds of "breaching allegiance" to the State of Israel, including by "committing a terrorist act, aiding a terrorist act, or being a member of a terrorist organization."<sup>12</sup> A recent example of the use of this amendment is the revocation of the residency status of the Palestinian human rights defender and lawyer, Salah Hammouri in October 2021. Hammouri's residency status was revoked through vague allegations of involvement in "terrorist activities" and/or affiliation with "terrorist entities" based on withheld so-called "secret evidence."<sup>13</sup> Hammouri was arrested in March 2022 and placed under a three-month administrative detention order – detention without charges or trial – which has been renewed twice since then, the last time being in September 2022.<sup>14</sup> He is one of nearly 490<sup>15</sup> Palestinians held without charge or trial in Israeli jails, but in his case, the residency revocation and imprisonment appear to be intertwined. On December 18th, 2022, the Israeli Ministry of Interior deported Salah to France during the early hours of the morning,

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7 <https://www.hrw.org/news/2017/08/08/israel-jerusalem-palestinians-stripped-status>

8 HaMoked. (2021). [Ministry of Interior data: 18 East Jerusalem Palestinians were stripped of their permanent residency status in 2020 as part of Israel's "quiet deportation" policy; 10 of them women.](#)

9 Adalah. (2022) [The Citizenship and Entry into Israel Law \(Temporary Order\), 5782-2022.](#)

10 Amnesty International. (2022, February 1). [Israel's apartheid against Palestinians: Cruel system of domination and crime against humanity.](#)

11 Jefferis, D. C. (2012). [The "Center of Life" Policy: Institutionalizing Statelessness in East Jerusalem.](#) *Social Science Research Network.*

12 The Jerusalem Center for Public and State Affairs. (2022, May 26). [Two-thirds of Jerusalem's residents live in the 'east of the city': 234,000 Jews and 362,000 Arabs.](#)

13 Addameer. (2022, August 9). [Salah Hammouri.](#) <https://www.addameer.org/prisoner/2992>

14 Tahhan, Z. A. (2022, September 5). [Israel extends detention of Palestinian French rights lawyer.](#) *Occupied West Bank News | Al Jazeera.*

15 Amnesty International. (2022, April 14). Israel/OPT: [Palestinian administrative detainees complete 100 days of boycotting Israeli courts.](#)

in what is considered the first case where Israeli authorities deports a Palestinian under the allegations of “terrorist activities.”

While the punitive revocation of residency on the grounds of “breach of allegiance” can only be challenged before a court, Palestinians whose residency is revoked based on the “center of life” criterion initially must file an application to retain it. Below we outline the processes Palestinians in Jerusalem must undergo to retain their residency status and how it shapes their everyday lives. We detail the invasive methods Israel uses as part of its investigative process and the private companies complicit in these processes.

## Proving “Center of Life” - Proving the Obvious

The process imposed by the Israeli Ministry of Interior on Palestinians in Jerusalem to prove that Jerusalem is their “center of life” is deliberately convoluted, draconian, and time-consuming, functioning as an additional means to surveil Palestinian Jerusalemites’ everyday lives and ultimately push them out of their city.

The application process begins with Palestinians completing a Ministry of Interior questionnaire and submitting a combination of supporting documents, including proof of ownership or rental of a residential property, payment of electricity and water bills, proof of employment in Israel, documents showing that children are integrated into Israeli educational institutions, payments of municipal taxes and up to date payment to the NII.<sup>16</sup>

It can take Palestinian residents months to arrange an appointment at the Ministry of Interior’s office and people must wait in line for hours once they schedule one. Beyond the emotional burden this process entails, it consumes both time and material resources. Many people lose days of work waiting in line and/or they must also arrange childcare to enable them to wait as long as is necessary. Moreover, Palestinians are forced to engage with these processes in Hebrew, a language in which the majority are not fluent. This forces many to seek private legal aid, adding another heavy financial burden on an already deprived community. In 2020, 61% of Jerusalem’s Palestinian residents lived below the poverty line.<sup>17</sup> Moreover, the arbitrary nature of the process means that the actual timeframe for the whole process can vary from one applicant to another, leaving many in a state of uncertainty for long periods. The structural violence embedded within this process is designed to keep Palestinians in East Jerusalem hanging by a thread.

## The Israeli National Insurance Institute – Surveillance and Corporate Complicity

The information on Palestinian Jerusalemites in the Ministry of Interior’s population registry is partly based on information collected by Israel’s NII. During an interview in 2022 with a lawyer who guides people through the process of retaining their residency, she described the NII as the “surveillance and policing mechanism” that feeds the Ministry of Interior with information. She mentioned that in an instance where a person has not paid their national insurance fees, this information is sent directly by the NII to the Ministry which can trigger the process to revoke that individual's residency status.

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16 National Insurance Website. [Residency Test for East Jerusalem](#).

17 The Jerusalem Center for Public and Jerusalem Center for Public and State Affairs. (2022, May 26). [Two-thirds of Jerusalem's residents live in the 'east of the city': 234,000 Jews and 362,000 Arabs](#).

In addition to the paperwork provided by Palestinian Jerusalemites, the NII relies on investigative methods to surveil and collect information on people's lives.<sup>18</sup> These include sending inspectors - both employees of the NII and private inspectors - to conduct strict, intrusive, and harsh investigations to verify that people's center of life is indeed in Jerusalem.<sup>19</sup> Investigation methods include surprise visits to people's homes and workplaces, as well as the questioning of co-workers and people surrounding the inspected individual.<sup>20</sup>

In other cases, the NII uses its power to exert political pressure on Palestinian Jerusalemites who depend on it for social benefits. After the Palestinian Unity Uprising in May 2021, at least 11 Palestinian political activists from East Jerusalem and their families found out that they had lost their health insurance as they were seeking medical care.<sup>21</sup> The stripping of their insurance by the NII was done without their knowledge and was not based on investigations of their "center of life," but rather appears to be a punitive measure to deter activists from engaging in political activity. According to a Freedom of Information request submitted by the NGO HaMoked - Center for Individual's Rights to the NII, the decision to revoke social rights was partly based on material delivered by the Shin Bet (the Israel Security Agency).<sup>22</sup>

This functionality of the NII, serving as a tool for political persecution through its tight-knit relationship with bodies like the Shin Bet, shows once again how the dichotomy between "civil" and "security" is artificial, particularly in the Israeli context. The role of the NII in the process of retaining residency is not just about providing or denying medical care and other services, but access to the very social and economic services it provides operates as a means of control and surveillance. Thus, for Palestinians, the NII is directly linked to an assemblage of potential insecurities, as a central pillar of Israel's "center of life" policy it can initiate the first step towards the revocation of their status.

## Private Investigation Companies

Three private investigation companies have been contracted by the NII to conduct investigations into Palestinians' lives as part of the "center of life" procedure. The contracted companies are - Tshuva Research, Human Safety Company for Accidents Investigation & Prevention (Betihut Enosh), and Moran Investigations.

According to the response received from NII to a Freedom of Information Request submitted by Who Profits, the first contract signed with Tshuva Research was in 2016; the first contract signed with Bitihut Enosh was in 2008; and the first contract signed with Moran Investigations was in 2004.<sup>23</sup> The last contract signed between the NII and the companies obtained by Who Profits was in 2022.<sup>24</sup> Between 2014-2017, these companies carried out 49% of investigations.<sup>25</sup>

The contractual agreement between the NII and the companies includes the submission of detailed files on each investigation. These include among others: a written description of the investigation's

18 HaMoked. (1998). [The Quiet Deportation](#).

19 Ibid

20 State Controller. (2019). [The State's Handling of the status of East Jerusalem's Residency](#). (in Hebrew)

21 Hasson, N. (2021, May 27). [Israel deprives East Jerusalem political activists of state insurance, stipends - Israel News](#). Haaretz.

22 HaMoked. (2022, August 28). [Court again criticizes National Insurance Institute's baseless decision to revoke Jerusalem Palestinians' health insurance and other social security rights](#).

23 Response on file with Who Profits.

24 On file with Who Profits.

25 State Comptroller report. (2019). [The State's Handling of the status of East Jerusalem's Residency](#). (Hebrew)

outcomes; relevant photographs taken during the investigation; recordings of all conversations with potential witnesses; recordings of the investigation itself and transcription of the recordings, including a translation from Arabic to Hebrew.<sup>26</sup>

## Corporate Info

### Tshuva Research

**General Info:**

Head office: Etsel Street 50, Or Yehuda Israel

Tel.: +972-3-6349988

Website: [www.tshuva.com/](http://www.tshuva.com/)

**Ownership:** The company is fully-owned by Nissim Tshuva.

**Partners:** Israeli Ministry of Defense, Intel, Pfizer

**Other involvements:** In 2018 the company won a tender in a total amount of NIS 250,000 with the Central Unit for Enforcement and Investigations of the Ministry of Agriculture and Rural Development. The Central Unit for Enforcement and Investigations was established following the agricultural agreements between Israel and the Palestinian Authority (PA) in order to monitor the transfer of agricultural produce from the PA to Israel. The investigation services include investigations located mainly in the Occupied West Bank.

In previous years the company provided services to the Israeli Police and the Ministry on Interior.

### Human Safety Company for Accidents Investigation & Prevention (Betihut Enosh):

**General Info:**

Head office: Yigal Alon Street 157, Tel Aviv 67443

Tel.: +972-3-6091533

Website: [www.betihut-enosh.com/](http://www.betihut-enosh.com/)

**Ownership:** The company is owned by Dan Engel (59.9988%) and Iftah Segev (40.0012%).

**Other involvements:** The company also investigates in the Occupied West Bank, in the Palestinians residing inside the Green Line (holders of Israeli citizenship), including the Bedouin communities in the Naqab (Negev).

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<sup>26</sup> Contract on file with Who Profits.

# Land Registration Process – Path to More Land Grab

## Background

In 2018, the Israeli government passed Resolution No. 3790 "Reducing Social and Economic Gaps and Economic Development in East Jerusalem."<sup>27</sup> The Resolution allocates around US\$560 million over five years to nominally improve East Jerusalem's Palestinian community's socio-economic conditions and access to services and employment. In what follows we highlight the launch of the land registration in occupied East Jerusalem which was singled out as a critical component of this "developmental plan." Of the Resolution's total budget, US\$14 million was allocated for the registration of all non-registered land in East Jerusalem by 2025.<sup>28</sup>

Prior to the Israeli occupation and the annexation of 70,500 dunams of East Jerusalem lands in 1967,<sup>29</sup> land registration procedures had been initiated in several neighbourhoods by the Jordanian government that controlled East Jerusalem between 1948 and 1967. After 1967, registered properties either remained in the hands of their owners or, if the owners were considered "absentees"<sup>30</sup> then their properties were transferred to the Custodian of Absentee Property. Additionally, in cases where properties were in the hands of the Jordanian Custodian of Enemy Property, these were transferred to the Israeli General Custodian.

Around 90% of land in East Jerusalem (30% of all land in the city),<sup>31</sup> was never registered, as Israel froze all land registration proceedings until the launch of this formal land drive in 2018. Although framed as part of a larger package to uplift East Jerusalem and its Palestinian inhabitants' socio-economic conditions and development, land registration is a key part of Israel's larger geopolitical agenda of Judaizing and strengthening Israeli governance on the ground, through which it can entrench "sovereignty over East Jerusalem," as succinctly articulated by the then Minister of Justice, Ayelet Shaked.<sup>32</sup> According to the Civic Coalition to Defend Palestinian Rights in Jerusalem, the land registration process may lead to the confiscation of around 60%<sup>33</sup> of Palestinian land and mass Palestinian dispossession, in violation of international law.<sup>34</sup>

Below we outline the deliberately convoluted, costly, and almost impossible process Palestinians must undergo if they are to register their lands, developments in the land drive process thus far, and finally we present Geoda, the company implicated in this process of bureaucratic dispossession.

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27 Prime Minister's Office. (2018, 13 May). [Reducing social and economic disparities and economic development in East Jerusalem. Resolution number 3790.](#)

28 Ibid.

29 Norwegian Refugee Council. (2013, December). [The legal status of East Jerusalem.](#)

30 According to Israeli law, an "absentee" is a person who owns assets in the state and has been living in an "enemy" state (i.e., the neighboring Arab states such as Lebanon and Syria) since 29 November 1947. This means that all Palestinian refugees expelled during the war are considered "absentees."

31 Madar Center. (2021, October). [Position Paper on Land Registration in Jerusalem \(2018-2025\) and Government Resolution 3790.](#) (Arabic).

32 Anat Danieli. (2018, May 13). [The Ministry of Justice will regulate the registration of land in East Jerusalem at a cost of NIS 50 million.](#) *Calcalist.* (Hebrew)

33 2021, October 5. [Land Settlement...Israel' Entry into Stealing Jerusalem Lands.](#) *Metras.* (Arabic).

34 [Joint Urgent Appeal to the United Nations Special Procedures on Israel's Permanent Illegal Annexation of Jerusalem.](#) (2021, November 08).



# The Process of Registering Land - Impossible by Design

People living on non-registered lands are notified that their plot of land will soon need to be registered through leaflets handed out by Israeli authorities in different neighbourhoods, or through official government websites, at least 30 days before the process starts.<sup>35</sup> To successfully register lands and properties (residential or commercial) under their names, Palestinians must prove ownership by providing Tabu (land registry deed) papers in addition to documents showing that the plot is free of any property tax debt.

Israel's insistence on particular documentation to prove Palestinian land ownership is not particular to this specific land registration drive. Reducing land ownership to "scientific techniques of measurement and quantification"<sup>36</sup> is a strategy used systematically across historic Palestine to deny Palestinians land ownership rights and to uproot whole communities.

Historically, including Ottoman and British colonial rule, Palestinians refrained from registering the majority of their lands to avoid paying hefty taxes, and also because they followed communal and traditional forms of land registration such as the Mukhtar (head of the village) protocol.<sup>37</sup> Under this procedure, two Mukhtars can affirm a person's ownership of a patch of land, even if that person does not hold documents that prove ownership. While such forms of evidence are rarely eligible or valid within Israeli legal proceedings to begin with, in June 2022 the Israeli Deputy Attorney General decided to annul the Mukhtar procedures.<sup>38</sup> Zionist-settler groups, such as Regavim (an Israeli settler NGO which files lawsuits against Palestinian construction), have long campaigned for the cancellation of the Mukhtar procedure in a bid to further the seizure of Palestinian lands.<sup>39</sup>

Furthermore, due to the particular colonial history of Palestine, many of the Tabu papers, if they exist at all, are in the possession of institutions in foreign countries, such as Jordan and Turkey, necessitating massive amounts of time and resources to obtain, which many cannot afford.<sup>40</sup>

In addition to the burden of proof, land registration may impose heavy costs on Palestinians. For a plot of land to be free of property tax debt, landowners must retroactively pay property tax to the Israeli authorities from the date of the occupation in 1967, if the lands are vacant. Property taxes include an annual property tax of 2.5% of the value of land, 25% of the profit gained from the sale of the property, or a purchase tax of up to 10% of the value of the asset. In some cases, the sum of the taxes might reach the value of the asset itself, and if not paid, the tax authorities will seize the asset. Thus, even if Palestinians have the necessary documentation to prove ownership of the land, it may still be confiscated due to the inability to pay such costly taxes.<sup>41</sup>

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35 Interviews with activists and research centers conducted by the Who Profits team in East Jerusalem.

36 Bhandar, B. (2018). *Colonial lives of property: Law, land, and racial regimes of ownership*. Duke University Press.

37 [The Association for the Advancement of Civil Equality](#). (2011).

38 Greenzig, Aveshei. (2022, June 24). [Instead of a "crowned procedure": the upheaval in the conditions for proving ownership of land in East Jerusalem](#). *Globes*.

39 Yosef, Idan. (2022, June 24). [A transformation in property registration](#). *News 1*.

40 Al Haq (2021, November 08). [Joint Urgent Appeal to the United Nations Special Procedures on Israel's Permanent Illegal Annexation of Jerusalem](#).

41 Ibid

## Dispossession Underway

Strands of the Palestinian community in East Jerusalem are pushing for the boycott of the land registration drive as they consider it a path towards further Judaization and settlement expansion in the city.<sup>42</sup> This is already evident as the Israeli government advances the implementation of the land registration drive in strategic locations marked for settlement expansion, as detailed below, and lands and properties that Jewish settler groups claim ownership over.

Critically, the land registration process excludes Palestinian refugees displaced from the city during and in the aftermath of the Nakba of 1948 and the city's occupation in 1967.<sup>43</sup> This includes Palestinian refugees who currently live in the occupied West Bank and Gaza. The exclusion enables the land registration drive to serve as another means of finalizing the theft of Palestinian refugee property. According to researcher Khalil Tufakji, much of the property in East Jerusalem is owned by heirs who reside abroad. To be able to register land, the heirs must produce proof of ownership, whether they do this or not, their land would still be considered 'absentee' property since the owners reside abroad and the land would therefore be considered to have no known owner, thus remaining in the hands of the Israeli state.<sup>44</sup>

Additionally, the involvement of the General Custodian in the process, as part of the committee overseeing land registration procedures, means that the Legal and Administrative Matters Law of 1970<sup>45</sup> can be used in the registration of some lands. This legal framework stipulates that owners of properties in East Jerusalem transferred to the control of the Jordanian government in 1948 can have it returned from the Custodian. However, this law applies only to Jews and does not apply to Palestinians.<sup>46</sup>

The recent registration of the Umm Haroun plot in the Sheikh Jarrah neighborhood as part of the current land registration drive is a case that demonstrates the detrimental effect of this law on Palestinian property and residents. Following a lawsuit filed by the settler organization, Nahalat Shimon,<sup>47</sup> Israeli authorities began the process of land registration in Umm Haroun without the knowledge of its Palestinian residents. By the end of the process, the land was registered under the name of Jews who had alleged ownership of the plot prior to 1948.<sup>48</sup> As a result, 45 Palestinian families living in the Umm Haroun area are now facing an immediate threat of expulsion.

Moreover, by the end of 2021, land registration procedures were underway in three plots in settlement neighbourhoods in East Jerusalem, including a plot in Giva'at HaMatos, with alleged Jewish ownership claims and where a plan for the expansion of the settlement is currently in the making;<sup>49</sup> a plot designated for the establishment of a new settlement called Giva'at Hashaked on the lands of

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42 From interviews conducted by the Who Profits team with three Palestinian activists and researchers in Jerusalem.

43 Adalah. (2021, November 16). [Renewing Land Registration in East Jerusalem is a Blunt Violation of International Law](#). (Hebrew).

44 Miftah. (2021, October). [Analysts and experts: The registration of Palestinian properties is aimed at transferring them to Israeli authorities](#).

45 Peace Now. (2019). [Systematic dispossession of Palestinian neighborhoods in Sheikh Jarrah and Silwan](#).

46 Ibid.

47 Ir Amim.(2021, August 02) [Supreme Court Hearing on Sheikh Jarrah Families Concludes without a Ruling](#).

48 Dagoni, N. [Ir Amim Monitoring Report on the Implementation of Government Resolution 3790 for the Investment in East Jerusalem](#). Quarterly report, May 2021. (Hebrew).

49 Dagoni, N.(2021 December 07) [The Custodian General "Organizes" East Jerusalem Residents](#). *Haaretz*. (Hebrew).

the Palestinian village of Beit Safafa,<sup>50</sup> and a plot in Atarot where a new settlement is planned.<sup>51</sup> In 2022, a land registration process began in an archaeological site adjacent to al-Aqsa Mosque run by the settler non-profit, the Ir David Foundation, also known as Elad.<sup>52</sup> Additionally, preparations have begun in a plot where a new settlement neighborhood is planned between the settlement of Har Homa and the Palestinian village of Sur Baher and a plot next to the settlement neighborhood of Ramat Shlomo.<sup>53</sup>

Taking advantage of the land registration drive, in September 2021 the Jewish National Fund (JNF) declared the allocation of a budget of NIS 100 million to begin the registration of enormous tracts of lands it supposedly "acquired" on both sides of the Green Line, including East Jerusalem.<sup>54</sup> The JNF is a non-profit and quasi-governmental organization whose role is to ensure that land registration is in the name of Jewish people.<sup>55</sup> According to its website, the JNF was established in 1901 to serve "as the operational arm of Zionism. In the name of the Jewish people, the KKL-JNF bought 2.6 million dunams of land, prepared the land for agriculture, founded settlements, and laid the foundations for the establishment of the state of Israel."<sup>56</sup> In this way, the JNF has consistently played an important role in the distribution of "state lands" and the ongoing dispossession of Palestinians on both sides of the Green Line.<sup>57</sup> The budget allocation happened after the JNF was contacted by the committee overseeing the land registration procedures to register lands that never underwent the official and bureaucratic process of registration and are now in the hands of the General Custodian. According to the JNF, the number of such properties in East Jerusalem is around 2,050 properties on at least 2,500 dunams of land.<sup>58</sup> Consequently, the registration process could lead to thousands of potential eviction lawsuits against Palestinians currently living in the areas in question.<sup>59</sup> Over the years, and particularly in East Jerusalem, the JNF has played an integral role in the growth of the settler movement and its attempt to further Judaize the city. For example, in Silwan, the JNF has orchestrated campaigns to evict Palestinians and repopulate their homes with Israeli settlers.<sup>60</sup>

## Corporate Complicity

In 2019, the private Israeli company, Geoda, won a Ministry of Justice tender to implement a part of the land registration process. Geoda specializes in geoinformatics, document digitization and planning, and land management.<sup>61</sup> The company is a subsidiary of the Israeli company Telrad Networks, a global actor specializing in the production and marketing of communication equipment,<sup>62</sup> and has a large portfolio of involvement with the occupation through its subsidiaries.<sup>63</sup>

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50 Ibid.

51 Hasson, N.(2022, June 26) [Israel Moves to Register Lands near Al-Aqsa Using Funds Earmarked for Palestinians](#). *Haaretz*..

52 Ibid.

53 Hasson, N.(2022, June 26) [The state has begun registering land near the Temple Mount, a process in which mainly Jews participate](#). *Haaretz*. (Hebrew)

54 The JNF general assembly protocol is on file with Who Profits.

55 IMEU. (2020, June 26). [Fact Sheet: What is the Jewish National Fund?](#)

56 KKL-JNF. (n.d.). [KKL-JNF: For a Sustainable Future for Israel - Keren Kayemeth LelIsrael-](#)

57 Ibid.

58 Ir Amim.(2021 August 17). [KKL-JNF and Israeli Authorities Are Misusing Land Registration Procedures to Advance Land Take-over Processes of an Alarming Magnitude](#).

59 Ibid.

60 IMEU. (2020 June 26). [Fact Sheet: What is the Jewish National Fund?](#)

61 Company website. [www.Geoda.co.il](http://www.Geoda.co.il)

62 Telrad's 2021 annual report is on file with Who Profits.

63 Telrad Networks profile on Who Profits database. <https://whoprofits.org/company/telrad-networks/>

Geoda was contracted for 24 months, with an option to extend the period for an additional 12 months. The tender specified that the total duration of the contract must not extend beyond 84 months.<sup>64</sup> As part of the contract, Geoda is responsible for assigning a project manager and an expert in the field of measurements, who will be in charge of providing service to all of the other teams involved in the process. Geoda also assists with managing the work on the ground, preparing tenders for conducting measurements, managing the tenders and contracts, and making sure everything is implemented on time. The company also provides an office and other relevant necessities for the different teams.

## Corporate Info

### Geoda

#### General Info:

Head office: 19 Habarzel St., entrance D, 3rd floor, P.O.B. 13108, Tel Aviv 6971025, Israel

Tel: +972-73-2955000

Website: [www.geoda.co.il](http://www.geoda.co.il)

**Revenues:** 1,063,000 USD

**Ownership:** The company is owned by Marmanet Organization and Project Management, which is a full subsidiary of the publicly-traded Israeli company Telrad Networks (TASE: TLRD).

**Subsidiaries:** Geoda Building Control Ltd.

**Partners:** Company clients include: Israel Electric Corporation (IEC), Eilat Ashkelon Pipeline Company, Netivei Israel- The National Transport Infrastructure Company, Israel Ports Development and Assets Company, Israel Land Authority, Paz Oil Company, The Israeli Ministry of Justice and the Coordinator of Government Activities in the Territories (COGAT).

**Other involvements:** In 2020, the company was contracted by the Coordinator of Government Activities in the Territories (COGAT) for the support of the "illegal construction" system operated by COGAT for NIS 20,000. The system is a specialized system that was developed in 2014 by Geoda based on COGAT's needs. Through the system, COGAT manages tens of thousands of "illegal construction" files in the West Bank. In 2018, a new tender was published for the development of a new system to replace the current one, and until the new system is implemented Geoda will continue maintaining the existing one.

In January 2022, the company published that it is leading the Israeli Prison Service's (IPS) digitization process, including scanning, deciphering, and computing data, as well as archiving services and micrography.

In 2019, the company was contracted, with an exemption from tender, to provide management and maintenance services to the Israeli Civil Administration (ICA) for an amount of NIS 26,325. In 2016, the company was contracted by the ICA, with an exemption from tender, to provide mapping and measurement service for NIS 46,800.

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64 Contract on file with Who Profits.