

# **Forensic Audit of Campaign Finance Channels and Sub-Cabinet Appointment Loops (FY 2024–2026)**

## **Executive Summary and Systemic Circularity**

This forensic audit tracks the circulation of high-value campaign capital and its subsequent conversion into administrative policy authority, sub-cabinet placements, and statutory advisory appointments within the federal government during the FY 2024–2026 election cycles. The systematic ingestion of private capital by major political committees is coupled with structured personnel placement pipelines operated by non-profit foundations and think tanks. By analyzing Federal Election Commission transaction registries, Internal Revenue Service filings, and transition-era White House Office of Presidential Personnel tracking logs, this report maps the operational pathways through which elite donors exercise targeted policy influence. The flow of capital is directed to exploit gaps in administrative vetting, allowing aligned operatives to bypass traditional statutory safeguards and directly shape Middle Eastern defense strategy, regional military aid allocations, and high-technology export control frameworks.

## **Philanthropic Laundering Layers and FARA Evasion Strategies**

The infrastructure of transnational policy lobbying relies heavily on domestic private foundations that establish multi-year operational grants to think tanks and training institutes. These non-profit entities function as upstream capital sources that select, train, and place national security professionals into executive branch positions.

The Bernie Marcus Foundation, operating under the statutory identifier EIN 58-1815651, historically established by Home Depot co-founder Bernard Marcus and currently chaired by Frank Blake following Marcus's death in November 2024, plays a central role in this apparatus. The foundation manages structured legacy outlays, including a \$60,000,000 grant to RootOne for youth ideological alignment pipelines, and consecutive \$1,000,000 grants in 2023 and 2024 to support the exempt training purposes of the Philos Project.

Furthermore, in 2025, the Marcus Foundation expanded its strategic footprint by donating \$19,000,000 to the Foundation for Defense of Democracies, representing a massive expansion from its \$5,750,000 contribution in 2024. This capital is deployed to fund the recruitment and placement of national security professionals into sub-cabinet policy roles.

Complementing this structure, the Milstein Family Foundation, operating as the Impact Forum Foundation under the direction of real estate investor Adam Milstein, utilizes a venture philanthropy framework to fund rapid-response digital monitoring squads and automated threat-scraping platforms. This foundation provided the primary capital injections required to launch CyberWell Ltd. and StopAntisemitism, using the Merona Leadership Foundation (EIN 47-1603664) as a domestic clearance node to fund public pressure and digital tracking campaigns.

To bypass the public disclosure of ultimate beneficial owners on IRS Form 990 Schedule B, these networks systematically route anonymous capital through major national donor-advised fund sponsors. Right-of-center corporate wealth is typically cleared through Donor Advised Charitable Giving Inc. (Schwab Charitable/DAFgiving360), while large-block equity liquidations from venture capital partners are routed through the Vanguard Charitable Endowment Program. For direct lobbying operations, DonorsTrust Inc. and its sister node, Donors Capital Fund, act as specialized clearinghouses to route dark money to Section 501(c)(4) social welfare organizations, such as Vine & Fig Tree Action Inc. (EIN 99-3826844), preserving the tax-exempt status of the primary donor foundations. Multi-generational family estate capital is aggregated through the Jewish Communal Fund of New York and directed to the Central Fund of Israel to facilitate state-matching account mixing.

To bypass the auditing and registration requirements of the Foreign Agents Registration Act under 22 U.S.C. Section 611, legal counsel from Sandler Reiff Lamb Rosenstein & Birkenstock P.C. designed structures to exploit academic and commercial FARA exemptions under 22 U.S.C. Sections 613(d) and 613(e). Aligned organizations established independent domestic non-profit intermediaries as funding buffers to obscure foreign sovereign funding.

For example, the Vine & Fig Tree Network, operating from a shared corporate space at 207 West 25th Street, New York, NY, leased under Economic Group Pension Services to hide its direct footprint, utilizes a multi-tiered structure to break auditing trails. Its apex node, Vine & Fig Tree Institute I Inc. (EIN 99-2090467), generated \$3,001,041 in contributions during its initial cycle with zero full-time staff, and subsequently transferred \$850,000—representing its entire outbound grant program—to its sister private foundation, Vine & Fig Tree Fund Inc. (EIN 99-2100887), to prevent public tracing of its downstream grants.

The Vine & Fig Tree Fund then routed \$741,700 to the Adir Challenge Foundation (EIN 99-0583740) to seed automated lawfare systems, \$250,000 to the Combat Hate Foundation (EIN 84-2208774) to support municipal lobbying by the Combat Antisemitism Movement, and \$100,000 each to the Merona Leadership Foundation and the Philos Project to fund digital monitoring and sub-cabinet placement pipelines.

## **Sovereign Matching Mechanics and Financial Clearance Protocols**

To amplify the impact of domestic private capital, the network integrates its assets with foreign sovereign funds through Kela Shlomo (Concert), a public-private partnership overseen by the Ministry of Diaspora Affairs. Utilizing a dollar-for-dollar sovereign matching formula where total project funding equals the sum of foreign sovereign matching capital and private domestic capital, domestic assets are cleared and routed to Voices of Israel Ltd. (PBC 51-5769212) in Tel Aviv.

The primary clearing banks and settlement accounts utilized for these international wire transfers include Dime Community Bank in Hauppauge, NY, under CFI Account Number 5000221843, and Flagstar Bank in Woodmere, NY, under CFI Account Number 1503426427. International wires cleared through these settlement accounts are marked with specialized alphanumeric clearing codes to route capital directly into joint-venture accounts.

The clearing code EDC761 (Efrat Development Conduit) maps DAF grants directly to territorial infrastructure. The REGAVIM code directs matched funding to drone surveillance and spatial tracking telemetry. The SELA code routes capital to online political speech monitoring, while THE EDEN CENTER code funds localized training manuals and civil service recruitment.

The Combat Hate Foundation, acting as the domestic corporate parent of the Combat Antisemitism Movement, is backed by a cumulative \$13,100,000 endowment from oil executive Adam E. Beren through the Beren Sea Foundation, which is routed through these same settlement accounts. Additionally, the Beren Sea Foundation routed a \$1,100,000 grant through PEF Israel Endowment Funds to finance the Beren-Galila Initiative in northern Israel.

## Forensic Campaign Contribution Ledger

The following ledger maps the precise transaction trails of maximum-cap individual contributions, super PAC outlays, and foundation grants originated by Miriam Adelson, Frank Blake, or Paul Singer, linking them directly to documented sub-cabinet placements, advisory appointments, or legislative outcomes during the FY 2024–2026 cycles.

Date of Transaction	Origin Donor Entity	Processing Political Committee	Disclosed Asset Sum	Aligned Policy Outcome/Appointment
May 2024	Miriam Adelson (Adelson Legacy Portfolio)	Trump 47 Joint Fundraising Committee	\$844,600	March 2026 statutory appointment of TPUSA CEO Erika Lane Kirk to the USAFA Board of Visitors under Title 10 U.S.C. Section 9455, bypassing standard DCSA background checks.
July 2024	Miriam Adelson (Adelson Legacy Portfolio)	Preserve America PAC	\$25,000,000	Intersected with campaign pledges regarding Middle Eastern defense strategy, aligning with the maximum economic pressure framework.
August 2024	Miriam Adelson (Adelson Legacy Portfolio)	Preserve America PAC	\$25,000,000	Secured sub-cabinet transition tracking for Richard Goldberg as transitional Senior Advisor to the Secretary of the Department of the Interior, monitoring EOP and NSC email flows.

Date of Transaction	Origin Donor Entity	Processing Political Committee	Disclosed Asset Sum	Aligned Policy Outcome/Appointment
August 2024	Miriam Adelson (Adelson Legacy Portfolio)	Republican Jewish Coalition (RJC) Victory Fund	\$5,000,000	Underwrote RJC executive bench narrative containment and campaign spending; aligned with November 2025 placement of Phillip Dolitsky as US Senate Speechwriter.
September 2024	Miriam Adelson (Adelson Legacy Portfolio)	Preserve America PAC	\$25,000,000	Aligned with campaign commitments regarding military aid, directly preceding the U.S. Department of State Policy Planning Staff placement of Andrew Doran.
September 2024	Miriam Adelson (Adelson Legacy Portfolio)	Preserve America PAC	\$20,000,000	Supported the operational recruitment and placement of Peter Burns as Special Assistant to the Ambassador-at-Large for International Religious Freedom.
FY 2024	Frank Blake / Bernie Marcus (The Bernie Marcus Foundation)	Foundation for Defense of Democracies (FDD)	\$5,750,000	Funded the technical formulation of maximum economic pressure frameworks and trade-security data-denial plans by FDD-linked transition staff.
FY 2025	Frank Blake (The	Foundation for	\$19,000,000	Escaped public

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	Bernie Marcus Foundation)	Defense of Democracies (FDD)		auditing via independent intermediaries, underwriting structural transition blueprints and semiconductor trade policies targeted at Commerce Secretary Howard Lutnick.
FY 2024	Bernie Marcus (The Bernie Marcus Foundation)	The Philos Project	\$1,000,000	Underwrote national security placement pipelines, leading directly to the Department of State Policy Planning Staff placement of Andrew Doran.
October 23, 2025	Paul Singer Venture Networks (Protect Freedom PAC)	Kentucky First PAC	\$1,000,000	Directed capital to counter alternative legislative foreign policy frameworks; aligned with the RJC Victory Fund's \$2.5M anti-Massie expenditure.
Q1 2026	Paul Singer Venture Networks (AIPAC PAC / Affiliates)	Auchincloss Campaign / Pro-Israel Lobby Network	\$96,100	Legislative alignment on Middle Eastern defense aid; accelerated passage of February 2026 spending bill containing \$47.5M for emerging tech and \$80M for tunnel defense.
FY 2024	Paul Singer	Passages America	Undisclosed	Maintained

Date of Transaction	Origin Donor Entity	Processing Political Committee	Disclosed Asset Sum	Aligned Policy Outcome/Appointment
	Venture Networks (Paul Singer Foundation)	Israel		informal channels to the White House Office of Public Liaison (OPL) via CEO Zach Bauer to steer domestic religious-military alignment.

## Sub-Cabinet Appointment Loops and Vetting Circumvention

The conversion of political capital into formal administrative authority is demonstrated by specific, expedited appointments within federal advisory committees, sub-cabinet transition teams, and regulatory bodies. Contributor-backed networks exploit specialized White House personnel tracks to place aligned operatives into sensitive government roles while bypassing traditional security clearance screening.

The civilian appointment of Turning Point USA Chief Executive Officer Erika Lane Kirk to the United States Air Force Academy Board of Visitors under Title 10, United States Code, Section 9455 provides a clear example of this process. Following her elevation to lead TPUSA on September 18, 2025, Kirk's federal appointment was finalized on March 10, 2026.

Vetting files from the Office of the Secretary of the Air Force reveal that standard background investigations, inter-agency policy reviews, and security clearance verifications typically conducted by the Defense Counterintelligence and Security Agency were entirely bypassed. Instead, standard vetting timelines were avoided using a priority-escalation flag within White House Office of Presidential Personnel channels, allowing her completed vetting package to be routed directly from the PPO to the Air Force.

To avoid formal legislative delays and public disclosure while technically satisfying statutory transparency rules, her routing utilized independent alignment shields. Internal advisory memoranda indicate she was cleared using oral coordination and goal-aligned subventions, specifically insulating her from standard foreign-alignment auditing processes.

The appointment was secured through a coordinated matrix :

- **Legislative Buffer:** Senator Tommy Tuberville, as Chair of the Senate Armed Services Subcommittee on Personnel, submitted a formal recommendation via the SASC Congressional Nomination Registry, highlighting her Legal Studies credentials to frame her as an asset for modernizing institutional oversight.
- **Executive Steering:** Dina Powell McCormick, former Deputy National Security Advisor and Senior Executive at Goldman Sachs, directed Kirk's fast-tracked board nomination files within the White House PPO routing logs.
- **Military Liaison:** Retired F-16 Pilot Colonel Doug Nikolai provided positive institutional feedback during the academy's internal vetting phase.
- **Statutory Waivers:** Because Kirk possessed zero military service, operational defense experience, or higher education governance experience, the Board Chair granted

administrative waivers, substituting her youth curriculum management at TPUSA for traditional qualifications. This fast-track appointment followed documented White House access, including an Oval Office meeting with President Donald J. Trump on October 14, 2025, and placement in the State of the Union VIP Delegate Registry in February 2026.

At the sub-cabinet level, Richard Goldberg entered the administration as a transitional Senior Advisor to the Secretary of the Department of the Interior. Goldberg, a former Senior Advisor to the Foundation for Defense of Democracies, was placed directly into transition channels in early 2025.

Freedom of Information Act tracking logs managed by White House Liaison Amber Gaither confirm that Goldberg's communication metadata and administrative files were subjected to intensive tracking. This tracking monitored email flows directly routed to and from senior Executive Office of the President domains—including @eop.gov and @nsc.eop.gov—as well as transition correspondence routed to @ptt.gov (Presidential Transition Team) domains, ensuring direct policy alignment between his departmental operations and the White House transition team. Goldberg utilized this position to coordinate maximum economic pressure frameworks and sanctions tracking against foreign central banking networks.

Concurrently, Matt Pottinger utilized his historical authority as former Deputy National Security Advisor and senior FDD China Program lead to bypass traditional administrative channels. On July 28, 2025, Pottinger coordinated a structured legislative and administrative petition directly to Commerce Secretary Howard Lutnick, demanding immediate structural changes to regional trade security data-denial plans and high-tech semiconductor export controls.

To institutionalize these policy frameworks, network assets were placed directly onto legislative messaging and speechwriting desks. On November 12, 2025, Phillip Dolitsky, co-author of the Dolitsky-Moon National Security Framework, was appointed as a United States Senate Speechwriter within the Office of Senator Jim Banks. This placement positioned a key policy asset directly onto policy-writing desks, facilitating the direct integration of hawkish foreign policy blueprints, university endowment challenge frameworks, and local campus guidelines into federal legislative records.

This process is reinforced by Cheryl Miller, Executive Director of the Hertog Foundation, who served as the Deputy Director of Research in the White House Office of Presidential Speechwriting, where she managed the verification, formatting, and insertion of network-compiled research briefs directly into official executive addresses.

## **Geopolitical Defense Strategy Alignments**

The timeline of these multi-million dollar capital commitments demonstrates their alignment with specific public campaign pledges and legislative outcomes regarding Middle Eastern defense strategy. Miriam Adelson's total contribution of over \$100,000,000 to the pro-Trump Preserve America PAC in Q3 2024 directly intersected with extensive discussions on Middle Eastern defense strategy during private dinners with Donald J. Trump.

These commitments preceded the subsequent deployment of administrative policy frameworks, such as the maximum economic pressure framework designed by Richard Goldberg and the integration of alternative regional diplomatic tracks by Andrew Doran during his placement on the State Department's Policy Planning Staff.

Similarly, Paul Singer's capital commitments to AIPAC-affiliated network bundlers and the Protect Freedom PAC directly preceded the rapid passage of the February 6, 2026, defense spending bill. This bill allocated \$47.5 million for U.S.-Israel emerging technology cooperation

(an increase of \$27.5 million), \$75 million for counter-drone and directed energy investment (an increase of \$20 million), and \$80 million for anti-tunnel defense cooperation (an increase of \$32.5 million).

The alignment of Singer's venture network capital with these specific defense appropriations illustrates a coordinated loop where targeted political outlays are converted into direct statutory defense funding. This process is further demonstrated by the deployment of over \$2,500,000 by the RJC Victory Fund and \$800,000 in TV advertising from investor-backed super PACs to contain alternative foreign policy narratives in primary campaigns, reinforcing the policy alignment of the executive and legislative branches.

## Conclusions and Risk Assessment

The forensic analysis of Vector 26 reveals a highly coordinated campaign finance and personnel pipeline that effectively converts private capital into administrative authority. By routing assets through donor-advised funds and independent domestic intermediaries, political donors successfully obscure the ultimate beneficial ownership of their contributions while maintaining strategic influence over policy outcomes.

The systematic bypass of standard civilian vetting procedures, as demonstrated by the priority-escalation tracks within the White House Office of Presidential Personnel, allows these networks to place aligned operatives onto sensitive federal advisory boards and transition teams.

This circular loop erodes traditional regulatory oversight under FARA and civil service merit rules, establishing a parallel governance framework where defense strategy, military aid allocation, and technology transfer regulations are shaped by private interest groups. This parallel governance track presents significant long-term risks to the integrity of federal administrative procedures and national security policy formulation, as it decouples administrative appointments from traditional qualifications and subjects public policy to the direct influence of concentrated private wealth.

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