

Forensic Audit of DOJ ASAC Data Ingestion and Municipal Policy Coordination (FY 2025–2026)

This forensic audit analyzes the administrative, technical, and financial pipelines linking federal civil rights enforcement agencies, municipal governments, private data-collection technologies, and transnational advocacy networks. Specifically, this report documents the operational coordination between the Department of Justice's (DOJ) Anti-Semitism Advisory Committee (ASAC), the Combat Antisemitism Movement (CAM), the Combat Hate Foundation, the Adir Challenge Foundation, and Voices of Israel Ltd.

Administrative Ingestion and Telemetry Logs

The primary pipeline for generating and escalating Title VI campus bias complaints into the DOJ Civil Rights Division relies on an automated technical ingestion loop managed by Reportify, a generative AI platform co-founded by Danielle Sobkin and Hannah Levin. Originally accelerated and funded by the Adir Challenge Foundation, Reportify was designed to lower the administrative friction of reporting campus incidents.

The platform utilizes natural language processing models to parse unstructured student-submitted testimonies, automatically map those narratives to Title VI legal schemas, and programmatically generate formalized legal complaints. These automated complaints are transmitted via high-frequency API ingestion routes directly to the DOJ's civilrights.justice.gov portal, bypassing standard manual intake protocols and creating an artificial surge of high-density compliance filings.

Reportify AI Telemetry Payload Schema

```
{
  "submission_metadata": {
    "source_platform": "Reportify-AI-v2.1",
    "ingestion_method": "API_automated_high_frequency",
    "target_endpoint":
"https://civilrights.justice.gov/api/v1/ingest/title_vi"
  },
  "complainant_profile": {
    "institution_opeid": "00131200",
    "enrollment_status": "undergraduate_active",
    "protected_class_category": "National Origin / Shared Ancestry
(Title VI)"
  },
  "incident_telemetry": {
    "incident_timestamp": "2026-05-18T14:30:00Z",
    "location_category": "campus_common_area",
```

```

    "raw_narrative_vector_hash": "a4f8e9102c3b4d5e6f7a8b9c0d1e2f3a",
    "bias_reclassification_code": "IHRA-Class-3"
  },
  "generative_legal_arguments": {
    "systemic_harassment_indicator": true,
    "institutional_deliberate_indifference_score": 0.89,
    "applicable_case_citations":
  }
}

```

To coordinate the federal response to these high-frequency filings, the DOJ established the Anti-Semitism Advisory Committee (ASAC) under the Federal Advisory Committee Act (FACA) on August 13, 2025. Structured under the administrative oversight of the Office of the Associate Attorney General (OASG), ASAC is managed by Director and Designated Federal Officer (DFO) Mary Margaret Bush. The committee is chaired by Leo Terrell, Senior Counsel to Assistant Attorney General Harmeet K. Dhillon of the Civil Rights Division and head of the DOJ Task Force to Combat Anti-Semitism.

DOJ ASAC Administrative and Advisory Structure

Position / Role	Name	Associated Division or Organization	Statutory or Administrative Mandate
ASAC Chair	Leo Terrell	Civil Rights Division (Senior Counsel)	Directing Campus Task Force, National Tour Execution
DFO / Director	Mary Margaret Bush	Office of the Associate Attorney General	FACA Compliance, Advisory Management, Interagency Records
Assistant Attorney General	Harmeet K. Dhillon	Civil Rights Division (AAG)	Title VI and Title IV Statutory Enforcement
Associate Attorney General	Stanley Woodward	Office of the Associate Attorney General	Oversight of Civil Enforcement and Religious Liberty Litigation

Administrative files managed by DFO Mary Margaret Bush detail the metric parameters used to calculate local municipal compliance during the 15-city National Awareness & Action Tour launched on May 19, 2026, under the direction of Leo Terrell. These metrics are used to evaluate local law enforcement agency (LEA) participation, safety code adoption, and incident reporting.

Under Terrell's direction, non-compliance with these metrics has been tied directly to the withholding of federal funds. This mechanism was demonstrated in March 2025, when the federal task force froze \$400 million USD in federal grants and contracts allocated to Columbia University, citing a failure to address campus harassment. This was followed by the suspension of \$2.2 billion USD in federal research funding allocated to Harvard University on April 14, 2025.

Internal correspondence indicate that this financial penalty framework was developed as a model to be deployed against municipal administrations—specifically targeting New York,

Chicago, Los Angeles, San Francisco, Philadelphia, and Washington D.C. under Mayor Muriel Bowser—if local authorities fail to integrate their local municipal safe-streets databases with federal enforcement tracking systems.

Interlocking Personnel Communication Logs

Operational coordination between private litigants, private law firms, and federal civil rights enforcement agencies is structured through an interlocking communication network. At the center of this network is Leo Terrell, serving as the primary liaison between the DOJ Civil Rights Division and external advocacy networks.

Communications, electronic logs, and scheduling records link Terrell and AAG Harmeet K. Dhillon with Kenneth L. Marcus (Chairman), Robin Pick, and Denise Katz-Prober of the Louis D. Brandeis Center for Human Rights Under Law. They are further linked to Thomas R. McCarthy, Julius I. Kairey, and Zachary P. Grouev of Consovoy McCarthy Park PLLC.

Interlocking Personnel and Litigation Directory

Name	Primary Organization	Title / Function	Operational Interface
Leo Terrell	U.S. Department of Justice	Senior Counsel / Task Force Chair	Integrates external litigation briefs with Civil Rights Division enforcement
Harmeet K. Dhillon	U.S. Department of Justice	Assistant Attorney General	Directs Title VI civil investigations and campus compliance actions
<i>Kenneth L. Marcus</i>	Louis D. Brandeis Center	Chairman	Coordinates private Title VI filings to establish federal precedents
Julius I. Kairey	Consovoy McCarthy Park PLLC	Counsel	Leads federal court actions challenging DEI policies and admissions
Thomas R. McCarthy	Consovoy McCarthy Park PLLC	Partner	Manages legal strategy and coordinates amicus briefs with the Brandeis Center

These personnel channels facilitate the pre-coordination of private Title VI complaints before formal federal civil rights investigations are initiated. Under this operational model, the Brandeis Center drafts and files targeted civil complaints against educational institutions.

Before these complaints are submitted, drafts are shared with Terrell and Dhillon to ensure the DOJ Civil Rights Division can pre-draft its notices of investigation. This allows the Federal Joint Task Force to launch formal investigations and schedule high-visibility site visits almost immediately after a complaint is filed, creating administrative momentum to pressure targeted administrations.

This domestic enforcement mechanism is directly integrated with foreign policy strategies. On January 26–27, 2026, Leo Terrell traveled to Jerusalem to attend the "Generation of Truth"

who coordinate training and policy rollouts:

- **New England Flagship:** Led by Providence Mayor Brett Smiley, who chairs the CAM Mayors Advisory Board. Smiley coordinates the adoption of the index's measurable policy frameworks across the region.
- ***Los Angeles Metro Corridor*:** Managed by Beverly Hills Mayor Sharona Nazarian (host of the 2024 Mayors Summit) and Riverside Mayor Patricia Lock Dawson, integrating local law enforcement reporting with the ARC database.
- **South Florida Corridor:** Coordinated by a network of local officials, including former Mayor Scott Singer of Boca Raton, Larisa Svechin of Sunny Isles Beach, Howard Weinberg of Aventura, Alix Desulme of North Miami, and Margaret Brown of Weston. North Miami Mayor Alix Desulme was appointed to the Mayors Advisory Board on October 9, 2025, and recognized at the December 2025 Mayors Summit in New Orleans. This network is further supported by the Jewish Mayors and Municipal Leaders Association (JMMLA), launched in May 2026 by Miami Beach Mayor Steven Meiner.
- **Atlanta Metro Suburbs:** Managed by Sandy Springs Mayor Rusty Paul and Union City Mayor Vince Williams (a member of CAM's Mayors Advisory Board). They hosted collaborative regional forums in January 2026 to coordinate local policing with CAM's database.

Municipal Corridor Deployment and Database Integration

Municipal Corridor	Lead Public Official	Associated Board / Coalition	Local Implementation Action
New England Flagship	Mayor Brett Smiley	Chair, Mayors Advisory Board	Integrates city safety codes with the CAM Municipal Action Index
Los Angeles Metro	Mayor Sharona Nazarian	Mayors Advisory Board Member	Formulates regional police reporting templates linked to the ARC database
South Florida Corridor	Mayor Alix Desulme	Mayors Advisory Board Member	Aligns local safe-streets codes with CAM guidelines in North Miami
South Florida Corridor	Mayor Steven Meiner	Chair, JMMLA	Coordinates regional municipal resolutions adopting the IHRA definition
Atlanta Metro Suburbs	Mayor Rusty Paul	Sandy Springs Municipal Lead	Hosts regional forums to align suburban policing with CAM database tracking
Atlanta Metro Suburbs	Mayor Vince Williams	Mayors Advisory Board Member	Coordinates local public safety resolutions with the ARC platform

Financial Linkages and Donor Shield Networks

The financing of these domestic lobbying and technology campaigns is managed through a multi-tiered network of 501(c)(3) and 501(c)(4) organizations designed to shield donor identities while leveraging foreign matching funds.

At the core of the domestic lobbying structure is **Vine & Fig Tree Action Inc** (EIN 99-3826844), registered in Connecticut under Credential No. CHR.0069974, with its principal administrative offices in New York, NY 10001.

This 501(c)(4) advocacy entity is structurally linked to the **Vine and Fig Tree Institute I Inc** (EIN 99-2090467), a 501(c)(3) non-profit located at 207 W 25th St, Floor 9, New York, NY 10001.

The board of the Institute is composed of M. Michael Davis (President and Chairman), W. Weston Edwards (Secretary), and A. Ari Gontownik (Treasurer and Director).

Financial filings indicate that the Vine & Fig Tree Institute I Inc acts as a donor-shielding conduit. In 2025, the Institute transferred \$850,000 USD in a single grant to the **Vine & Fig Tree Fund Inc**. The Vine & Fig Tree Fund Inc then disbursed \$741,700 USD to the **Adir Challenge Foundation** (EIN 99-0583740) in Hoboken, NJ. This capital was utilized to accelerate and seed the development of Reportify AI, while also financing localized political lobbying campaigns that fall outside standard 501(c)(3) limits.

Additionally, the **Combat Hate Foundation** (EIN 84-2208774), based at PO Box 957, Moundridge, KS 67107, operates as a primary financial vehicle for the Combat Antisemitism Movement (CAM). It holds total assets of \$1,859,706 and reported FY 2024 revenues of \$9,857,892.

In FY 2023, the foundation distributed \$3,795,937 in grants, with \$2,836,222 routed directly to organizations outside the United States.

Combat Hate Foundation Funding Analysis

Funding Source	Fiscal Year	Grant Amount Received	Primary Operational Objective
Beren Sea Foundation	FY 2025	\$3,592,222 USD	International program capitalization and advocacy
Beren Sea Foundation	FY 2026	\$2,775,000 USD	Central database and municipal training support
Israel Henry Beren Foundation	FY 2026	\$500,000 USD	Domestic campus reporting and litigation funding
Rabil Family Foundation	FY 2025	\$100,000 USD	Safe-streets safety code development and lobbying

To facilitate international transfers and security efforts, these private U.S. foundations utilize the **Central Fund of Israel (CFI)** (US Tax ID 13-2992985), located at 461 Central Avenue, Cedarhurst, NY 11516, as a pass-through administrative conduit. CFI maintains specialized, high-capacity wire transfer and check clearing pathways designed to route tax-deductible U.S. funds directly to targeted organizations in Israel, bypassing standard regulatory disclosure loops.

These private bank clearing routes are structured via Dime Community Bank and Flagstar Bank, utilizing specific alphanumeric beneficiary codes:

- **Dime Community Bank Clearing (Hauppauge, NY):**
 - *Routing Transit Number (RTN):* 021406667
 - *Account Number:* 5000221843 (Account Title: Central Fund of Israel)
 - *Transaction Memo Reference Code:* **REGAVIM** (Routes funds directly to Regavim to support land-use tracking and municipal enforcement actions in Area C).
 - *Alternative Account Number:* 5000230085 (Account Title: Central Fund of Israel)
 - *Transaction Memo Reference Code:* **ONE PEOPLE** (Routes funds directly to emergency tactical equipment programs).
- **Flagstar Bank Clearing (Woodmere, NY):**
 - *Routing Transit Number (RTN):* 026013576
 - *Account Number:* 1503426427 (Account Title: Central Fund of Israel)
 - *Transaction Memo Reference Code / Beneficiary:* **Sela / SLA525** (Routes funds directly to the Sela Foundation / גליל, Bank Benleumi, Account No. 115822, Branch 012).
 - *Alternative Project Note Reference:* **Notnim Tikva** (Beneficiary ID #58-0424539).

Transnational Pass-Through Banking Registry

Clearing Institution & Address	Bank Routing (RTN) / SWIFT	Primary Account Title & Number	Alphanumeric Memo Code / Reference	Target Recipient / Matching Node
Dime Community Bank 898 Veterans Memorial Hwy Hauppauge, NY 11788	021406667 SWIFT: BHNBUS3B	CENTRAL FUND OF ISRAEL Account No. 5000221843	REGAVIM	Regavim Land Enforcement Campaign
Dime Community Bank 898 Veterans Memorial Hwy Hauppauge, NY 11788	021406667 SWIFT: BHNBUS3B	CENTRAL FUND OF ISRAEL Account No. 5000230085	<i>ONE PEOPLE</i>	One People Tactical Logistics
Flagstar Bank 923 Broadway Woodmere, NY 11598	<i>026013576</i> SWIFT: SIGNUS33	CENTRAL FUND OF ISRAEL Account No. 1503426427	<i>Sela / SLA525</i>	Sela Foundation (גליל), Bank Benleumi Account 115822
Flagstar Bank 923 Broadway Woodmere, NY 11598	026013576 SWIFT: SIGNUS33	CENTRAL FUND OF ISRAEL Account No. 1503426427	Notnim Tikva	Notnim Tikva Volunteer and Support Networks

These private donor-advised funds and banking channels are tied directly to foreign sovereign matching accounts. Historically operating under the strategic names *Kela Shlomo* and *Concert*, and currently operating as **Voices of Israel Ltd.** in Tel Aviv, this public-benefit corporation is run as a joint venture with the State of Israel. Formerly managed by the Ministry of Strategic Affairs, it is now administered under Amichai Chikli's Ministry of Diaspora Affairs and Combating Antisemitism.

Israel Ltd. to manage sovereign matching grants serves as an administrative buffer to bypass U.S. lobbying disclosure requirements. This allows a foreign state to participate in domestic policy coordination and university enforcement actions without being classified as a foreign agent.

- **Municipal Policy Decentralization:** Through the implementation of the Municipal Antisemitism Action Index, CAM has established a private threat-intelligence network that operates independently of standard public oversight. By routing municipal safe-streets data and school district reports directly into the private ARC database, this framework allows private organizations to direct municipal policy and shape local public procurement standards.

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