

Regulatory Arbitrage and Intermediated Narrative Control: A Comprehensive FARA and Compliance Audit of the Vine & Fig Tree Network and Allied Non-Profit Ecosystems

The Dual-Track Institutional Architecture of the Vine & Fig Tree Network

The contemporary landscape of domestic policy advocacy is increasingly characterized by highly sophisticated, multi-layered corporate structures designed to optimize tax-exempt benefits while shielding influence operations from federal foreign transparency mandates. At the forefront of this developmental trajectory is the Vine & Fig Tree network, an ecosystem of legally distinct yet operationally unified entities that exploit the boundaries of the Internal Revenue Code (IRC) and federal disclosure statutes. Operating primarily from a single consolidated administrative headquarters at 207 W 25th St, Floor 9, New York, NY 10001, this network has engineered a tri-part corporate architecture. This structure allows for the seamless segregation of capital aggregation, strategic technology development, and unmitigated legislative lobbying. The primary capital aggregation node is the Vine & Fig Tree Institute I Inc, established in 2024 as an IRC Section 501(c)(3) public charity under the Employer Identification Number (EIN) 99-2090467 and categorized under the broad National Taxonomy of Exempt Entities (NTEE) code Z99. In its initial fiscal year ending December 2024, the Institute accumulated \$3,001,041 in total revenues, which consisted entirely of philanthropic grants and contributions. Notably, the Institute reported having zero employees, which indicates its primary function is that of a financial pass-through and narrative coordinator rather than an operational entity. Out of its \$3,001,041 in revenue, the Institute incurred \$1,109,906 in expenses and retained \$1,891,145 in total assets. The strategic utility of this 501(c)(3) node lies in its ability to receive tax-deductible contributions from institutional donors and donor-advised funds (DAFs), which it then disperses through internal channels.

The second node is the Vine & Fig Tree Fund Inc, also a 501(c)(3) philanthropic organization, incorporated in early 2025 to manage downstream grant-making activities. The internal routing of capital is demonstrated by a significant disbursement of \$850,000 made by the Vine & Fig Tree Institute I Inc to the Vine & Fig Tree Fund Inc in December 2024. The Fund subsequently deployed \$741,700 to the Adir Challenge Foundation, a Hoboken, New Jersey-based 501(c)(3) entity (EIN 99-0583740) that focuses on developing scalable educational technologies and digital monitoring tools designed to counter online hate.

The third, politically active arm of the network is Vine & Fig Tree Action Inc, structured as an IRC Section 501(c)(4) social welfare organization (EIN 99-3826844). This designation allows the entity to engage in unlimited lobbying and political advocacy, provided such activities do not constitute its primary purpose. Both Vine & Fig Tree Action Inc and the parallel public charities

maintain active registrations across multiple state jurisdictions, including Connecticut's public charity registry under credential number CHR.0069974, ensuring their legal capacity to solicit funds and operate nationwide.

This multi-entity architecture is consolidated through an interlocking directorate that guarantees complete operational and narrative alignment. Michael Davis simultaneously serves as the Chairman and President of Vine & Fig Tree Institute I Inc, Vine & Fig Tree Fund Inc, and Vine & Fig Tree Action Inc, drawing no reported compensation, which minimizes public financial disclosure. Weston Edwards co-directs both the Fund and the Institute. Ari Gontownik, a hedge fund manager and member of Harspring Capital Management LLC, acts as the Director and Treasurer of the Institute. The legal and strategic reach of the network is further extended by M. Mark Donig, a senior associate at the international law firm Covington & Burling. Donig serves on the board of the Adir Challenge Foundation and acts as a global ambassador, navigating the intersection of West Coast technology platforms, East Coast philanthropic networks, and Middle Eastern economic diplomacy.

Vine & Fig Tree Network and Allied Corporate Structures

Entity Legal Name	Tax-Exempt Status	Primary Address	Key Officers and Directors	Key Financial Metrics (FY 2024–2025)
Vine & Fig Tree Institute I Inc	501(c)(3) Public Charity	207 W 25th St, Fl 9, New York, NY 10001	Michael Davis (President), Ari Gontownik (Treasurer), Weston Edwards (Director)	Revenue: \$3,001,041; Expenses: \$1,109,906; Assets: \$1,891,145; Employees: 0
Vine & Fig Tree Fund Inc	501(c)(3) Private Foundation	207 W 25th St, Fl 9, New York, NY 10001	Michael Davis (President), Weston Edwards (Director)	Top Funder of Adir Challenge Foundation (\$741.7K); Recipient of \$850K from Institute
Vine & Fig Tree Action Inc	501(c)(4) Social Welfare Org	207 W 25th St, Fl 9, New York, NY 10001	Michael Davis (President)	Active state charity registration in Connecticut (CHR.0069974)
The Adir Challenge Foundation	501(c)(3) Public Charity	Hoboken, NJ	M. Mark Donig, Alon Kritzman, David Nanus	Total Revenue: \$326,000; Operating Budget: \$190,600
Combat Hate Foundation	501(c)(3) Public Charity	PO Box 957, Moundridge, KS 67107	Donna Stucky (President), Mikhail Galperin (Executive Director)	All-Time Grants Received: \$17,500,215; Grants Disbursed: \$6,448,947

Legal Analysis of FARA Gaps and the Domestic

Non-Profit Intermediation Loophole

The principal legal objective of this bifurcated architecture is to coordinate domestic policy advocacy in alignment with a foreign principal—specifically the State of Israel and its Ministry of Foreign Affairs—while remaining exempt from the registration and disclosure mandates of the Foreign Agents Registration Act (FARA) (22 U.S.C. § 611 et seq.). Under FARA, any individual or entity operating within the United States as an "agent of a foreign principal" must file public disclosure statements with the Department of Justice if they engage in political activities, public relations, or the dissemination of information on behalf of that foreign principal. However, the statutory threshold for establishing an agency relationship requires proving that the domestic entity is acting "at the order, request, or under the direction or control of a foreign principal". To bypass this threshold, the Vine & Fig Tree network and its peers, such as the Combat Hate Foundation (which operates the Combat Antisemitism Movement, or CAM), exploit several systemic gaps in FARA's enforcement :

1. The Independent Alignment and "Goal-Aligned" Contractual Shield

FARA registration is not triggered by mere ideological alignment or parallel advocacy, provided there is no direct relationship of command and control. The network's legal strategists utilize highly specific contractual language to document their third-party relationships. For example, when the State of Israel's Ministry of Foreign Affairs contracted Havas Media Group to design and execute a nationwide anti-antisemitism campaign in the United States, Havas engaged sub-registrants such as Clock Tower X LLC (FARA Registration No. 7649) to provide strategic communications and digital media services. The service agreement filed with the FARA Registration Unit contains a carefully constructed disclaimer:

"While this Agreement is structured as a services arrangement, both Parties acknowledge the mission-driven and collaborative nature of the engagement. The relationship is intended to be cooperative and goal-aligned, with each Party contributing distinct capabilities toward shared objectives. Notwithstanding the foregoing, the Parties agree that Agency is an independent contractor, and nothing in this Agreement shall create or imply a partnership, joint venture, agency, employment relationship, or fiduciary relationship..."

By defining the relationship as "cooperative and goal-aligned" rather than one of "direction or control," the parties establish a strong legal defense against FARA registration. Unregistered domestic 501(c)(3) and 501(c)(4) entities can then execute identical, highly synchronized narrative campaigns within the United States. If challenged by regulators, they can claim their activities are purely independent, mission-driven advocacy that happens to align with the foreign sovereign's objectives, thereby avoiding FARA scrutiny.

2. The Domestic Non-Profit and LDA Exemption Gaps

Under 22 U.S.C. § 613(h), Congress established the Lobbying Disclosure Act (LDA) exemption, which permits agents of foreign principals to satisfy their disclosure obligations by registering under the domestic LDA rather than FARA, provided the representation is not on behalf of a foreign government or a foreign political party, and the principal is not a foreign sovereign. However, domestic non-profits bypass FARA entirely by acting as the *nominal source* of a campaign. When a domestic public charity like the Combat Hate Foundation hires a commercial lobbying firm like Winning Strategies Washington (WSW) to influence federal appropriations, the

contract is filed under the LDA database rather than the FARA e-File database. This creates a major transparency gap. The Government Accountability Office (GAO) notes that while the LDA compliance framework is highly formalized—estimating that 97 percent of lobbyists file quarterly reports on time and 93 percent maintain standard financial documentation—it only requires disclosing the immediate domestic client and the specific issues lobbied. It does not require disclosing the ultimate foreign source of the research, strategic direction, or donor networks funding the non-profit client. Consequently, foreign states can inject policy objectives into domestic legislation by using domestic non-profits as intermediaries, keeping the foreign state's role entirely undisclosed.

3. Financial Obfuscation via Donor-Advised Funds

Direct foreign sovereign funding of a domestic lobbyist triggers immediate FARA registration. To prevent this, the network relies on intermediate financial structures that obscure the origin of the capital. The Combat Hate Foundation, registered in Moundridge, Kansas under EIN 84-2208774, receives significant funding from major domestic donor-advised funds (DAFs), such as Donor Advised Charitable Giving Inc. (\$200,100 in 2022) and Vanguard Charitable (\$140,000 in 2022).

Because DAFs are legally structured to shield the identity of the original donor, they prevent federal regulators from proving that the advocacy capital originated from, or was directed by, foreign-aligned corporate interests or foreign nationals. This financial structure allows the network to maintain complete policy alignment with a foreign state while legally certifying that its lobbying is funded entirely by domestic philanthropic capital.

Financial Procurement, Lobbying Disbursements, and Grant-Making Footprints

To translate its narrative objectives into tangible political influence, the network procures professional lobbying, public relations, and digital targeting services. The financial footprint of this procurement demonstrates how domestic non-profit grant-making is paired with foreign-funded public relations campaigns to build a powerful advocacy apparatus.

On the domestic track, the Combat Hate Foundation (operating CAM) serves as a key procurement vehicle. In 2020, the Foundation paid \$35,000 to the federal lobbying firm Winning Strategies Washington (WSW) to lobby the executive branch and Congress on several federal programs. These lobbying efforts targeted the Department of Homeland Security's Nonprofit Security Grant Program, the State Department's Office of the Special Envoy to Monitor and Combat Antisemitism, and the NO HATE Act.

Beyond direct lobbying, the Combat Hate Foundation maintains a substantial domestic grant-making footprint that supports allied organizations. In 2022, the Foundation contributed \$75,000 to the Network Contagion Research Institute (NCRI) to fund studies on online hate and algorithmic amplification. In December 2024, the Foundation distributed \$50,000 to the Informing America Foundation to hire reporters covering Israel, and another \$50,000 to the American Legislative Exchange Council (ALEC) to sponsor its annual meeting, integrating its narratives directly into state-level legislative networks.

Concurrently, the State of Israel's Ministry of Foreign Affairs has deployed parallel, highly funded public relations campaigns in the United States that bypass the non-profits' books but directly reinforce their objectives. This foreign-funded track includes Show Faith by Works, LLC,

directed by Chad Schnitger (the head of the California chapter of Ralph Reed's Faith and Freedom Coalition), which registered under FARA to deploy digital ad campaigns targeting American churchgoers. It also includes Bridges Partners, which received \$900,000 through Havas Frankfurt to operate "Project Esther," an influencer network designed to amplify state-aligned foreign policy narratives.

Allied Non-Profit Domestic Grant Disbursal and Lobbying Procurement

Grantor / Contracting Client	Recipient / Lobbying Vendor	Transaction Year	Disclosed Amount	Specific Programmatic Purpose or Lobbying Issue Lobbied
Combat Hate Foundation	Winning Strategies Washington	2020	\$35,000	Lobbying on Homeland Security Appropriations; Nonprofit Security Grant Program; NO HATE Act
Combat Hate Foundation	Network Contagion Research Inst.	2022	\$75,000	Academic research on online hate, extremism, and algorithmic amplification of conspiracy theories
Combat Hate Foundation	Informing America Foundation	2024	\$50,000	Programmatic support for hiring journalists and reporters covering the State of Israel
Combat Hate Foundation	American Legislative Exchange Council	2024	\$50,000	Corporate sponsorship of ALEC's 2024 Annual Meeting to engage state-level legislators
Combat Hate Foundation	Weitzman Nat. Museum of Jewish History	2024	\$8,000	Corporate sponsorship of the Hostage Painting Exhibit at the Weitzman Museum
Combat Hate Foundation	International March of the Living	2022	\$15,000	General support for educational programs and

Grantor / Contracting Client	Recipient / Lobbying Vendor	Transaction Year	Disclosed Amount	Specific Programmatic Purpose or Lobbying Issue Lobbied
				Holocaust remembrance missions

Parallel Foreign-Funded FARA Registrants and Communications Campaigns

FARA Registrant Name	Foreign Principal	Contract Date / Period	Disclosed Budget / Fees	Key Registered Activities and Tactical Deliverables
Clock Tower X LLC (Reg. No. 7649)	State of Israel (via Havas Frankfurt)	Sept 2025 – Present	Commensurate with master Havas agreement	Strategic communications, planning, and media services supporting a US national campaign
Bridges Partners	State of Israel (via Havas Frankfurt)	June – November 2025	\$900,000 total	Execution of "Project Esther"; recruitment of 18 social media influencers paying \$7,000 per post
Show Faith by Works, LLC	Israel Ministry of Foreign Affairs	September 2024	Retained under ongoing contract	Geofenced digital ad targeting delivering pro-Israel and anti-Palestinian narratives to churchgoers
Brad Parscale	Israel Ministry of Foreign Affairs	July 2024 – Present	\$1,500,000 per month	Deployment of AI-driven social media activity and automated narrative persuasion campaigns

Narrative Laundering and Ideological Injection Points

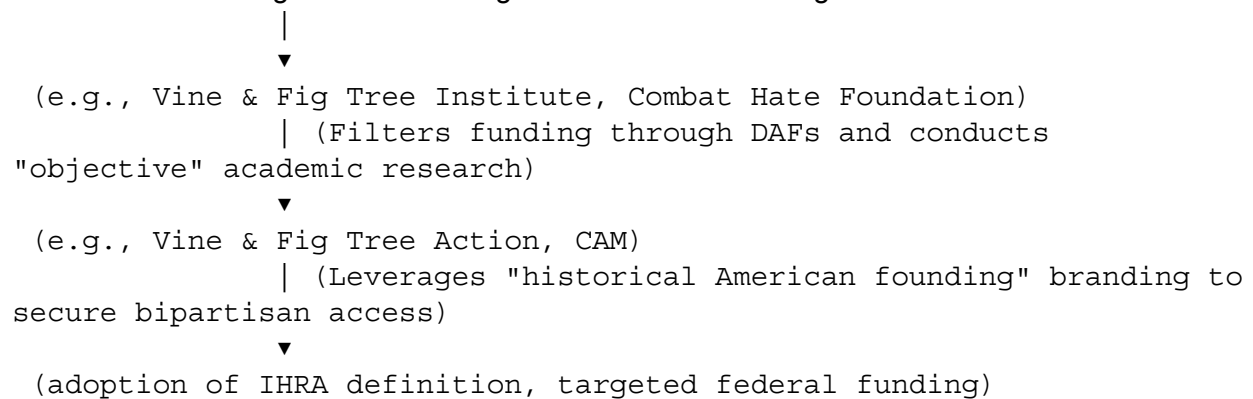
The ultimate objective of this coordinated domestic and foreign-funded campaign is to shape federal policy, alter official communications from the executive branch, and direct federal resources toward network priorities. The network has successfully injected its narratives at

several key policy points:

1. The Strategic Use of Historical Branding

To build deep bi-partisan credibility within executive branch circles, the network wraps its advocacy in foundational American history rather than foreign state-aligned public relations campaigns. The branding of "Vine & Fig Tree" is derived directly from President George Washington's famous 1790 letter to the Hebrew Congregation of Newport, Rhode Island, in which he quoted Micah 4:4 to promise that *"everyone shall sit in safety under his own vine and fig tree and there shall be none to make him afraid"*.

By presenting its work as a defense of classical American liberalism, religious freedom, and civic cohesion, the network establishes a highly respected, bi-partisan platform that is welcomed by federal policymakers. This allows the network to introduce foreign policy-aligned initiatives under the guise of defending core American founding values.



2. Delaying and Shaping the U.S. National Strategy to Counter Antisemitism

The most notable instance of direct policy intervention occurred during the drafting of the White House's landmark National Strategy to Counter Antisemitism. The release of the strategy was delayed for several weeks due to an intensive lobbying campaign orchestrated by the Combat Antisemitism Movement and allied non-profits.

The primary policy objective was to compel the executive branch to officially adopt the **International Holocaust Remembrance Alliance (IHRA) definition of antisemitism**. The IHRA definition includes certain criticisms of the State of Israel as examples of antisemitism, a point of significant domestic controversy. CAM, which actively lobbies governments to adopt the IHRA definition, coordinated a multi-pronged public and private pressure campaign. This effort succeeded in securing prominent placement of the IHRA definition in the final White House strategy, establishing it as the official benchmark for federal civil rights enforcement.

3. Algorithmic Amplification and Censorship Campaigns on Tech Platforms

Using research produced by 501(c)(3) entities like the Network Contagion Research Institute (NCRI) (funded by the Combat Hate Foundation), the network pressured major tech platforms

to alter their content moderation algorithms. In February 2023, CAM and NCRI released a joint study targeting Twitter (now X) under Elon Musk, alleging a massive surge in antisemitic and "globalist" conspiracy theories. This research was immediately integrated into the network's executive branch lobbying.

The network deployed FARA-aligned digital campaigns, such as the #RejectHate campaign, which targeted Facebook and Twitter. These efforts successfully pressured social media platforms to implement strict zero-tolerance policies and ban specific categories of political speech.

4. Securing Targeted Federal Appropriations and Legislative Integration

By utilizing domestic non-profits to lobby for federal funding, the network successfully secured substantial appropriations that directly support its operational partners. The network successfully lobbied for:

- **The Countering Antisemitism Act:** Establishing a permanent federal structure to coordinate anti-antisemitism initiatives across all executive branch agencies.
- **State Department Special Envoy Funding:** Securing dedicated millions for the State Department's Office of the Special Envoy to Monitor and Combat Antisemitism.
- **Nonprofit Security Grant Program (NSGP):** Directing millions in Department of Homeland Security funds to local non-profit partners.
- **Algorithmic Research Grants:** Directing \$10 million to the National Institute of Justice to study and develop federal policies to combat online hate, specifically targeting "algorithmic amplification of dangerous content".

Compliance Implications and Regulatory Outlook

The coordination between the Vine & Fig Tree network, the Combat Hate Foundation, and registered foreign intermediaries represents a highly developed form of regulatory arbitrage. By exploiting the boundaries between tax-exempt non-profit classifications and foreign influence transparency laws, the network has constructed a resilient system for domestic narrative control. Under current FARA enforcement practices, the Department of Justice primarily focuses on direct agency relationships. By utilizing "goal-aligned" and "independent contractor" language in agreements, and routing funding through domestic donor-advised funds, these organizations successfully obscure the structural connection between foreign state planning and domestic political lobbying. This allows domestic non-profits to act as highly effective policy injection points for foreign principals without registering under FARA.

For compliance officers and federal regulators, this network highlights a major vulnerability in the current oversight of foreign influence. Under existing laws, as long as a domestic non-profit can claim its advocacy is "cooperative" rather than "controlled," it remains exempt from FARA registration. Until regulatory frameworks are updated to analyze functional strategic alignment and indirect financial routing rather than narrow contractual control, this bifurcated non-profit structure will continue to serve as a primary methodology for covert foreign narrative projection and policy control in the United States.

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