

Jurisprudential Shield Audit: Legal Exploitation of FARA Exemptions and Intermediated Agency Contracts (FY 2024–2026)

Executive Summary

This forensic audit examines the legal mechanisms, corporate architectures, and contractual strategies deployed by foreign sovereign entities and domestic advocacy networks to operate within the United States without triggering registration under the Foreign Agents Registration Act (FARA), 22 U.S.C. § 611 et seq. Focusing on the advisory track of Washington-based political law firm Sandler Reiff Lamb Rosenstein & Birkenstock P.C. and matching fund accounts associated with Israel's Ministry of Strategic Affairs and Ministry of Diaspora Affairs, this report analyzes how target entities exploit statutory exemptions and intermediated agency contracts to construct a highly resilient jurisprudential shield.

The findings of this audit are based on data ingested from unredacted corporate registries, leaked Ministry of Justice correspondence retrieved by the hacktivist collective "Anonymous for Justice," and the internal dossiers *Policy Textual Variance Analysis.pdf*, *Foreign Agent Audit & Financial Tracing.pdf*, and *Non-Profit Foreign Influence Investigation.pdf*. Through these sources, this audit isolates the precise statutory arbitrage of the academic and commercial/private exemptions under 22 U.S.C. §§ 613(e) and 613(d), maps the double-insulated financial conduits of the Combat Hate Foundation and the Vine & Fig Tree Fund Inc., and dissects the contractual disclaimers used to legally sever de jure agency relationships.

The Sandler Reiff Advisory Track & Sovereign FARA Appraisals

The Inception of the Sovereign Deflection Campaign

In response to escalating Department of Justice (DOJ) enforcement of FARA—intensified by high-profile investigations into foreign influence campaigns—the Israeli Ministry of Strategic Affairs initiated a comprehensive restructuring of its external advocacy programs in 2017. Under the leadership of Director-General Sima Vaknin-Gill, a former military intelligence officer and Chief Military Censor for the Israel Defense Forces (IDF), the Ministry established a public-private partnership styled as a "PR commando unit". This unit, initially chartered as "Kela Shlomo" (Solomon's Sling), was subsequently rebranded as "Concert" in 2018 and "Voices of Israel" in 2021.

To insulate this public-private partnership and its domestic U.S. partners from mandatory registration under 22 U.S.C. § 611(c), the Israeli government retained Sandler Reiff Lamb Rosenstein & Birkenstock P.C. on a continuous basis from 2018 through at least 2022. The

primary legal architects for the engagement were Joseph E. Sandler, former general counsel to the Democratic National Committee, and Joshua I. Rosenstein, an expert in FARA compliance and political law.

According to legal correspondence recovered from the Israeli Justice Ministry, legal advisers Ronen Glazer and Liat Glazer coordinated directly with Sandler Reiff to assess the structural vulnerabilities of Concert's matching grant programs. A seminal legal strategy memo dated July 2018 concluded that FARA compliance would devastate the operational efficacy of domestic American advocacy groups by forcing them to register as "foreign agents," labeling their materials with "propaganda" disclaimers, and submitting all distributed collateral to the DOJ within 48 hours. Furthermore, the memo noted that major private donors were categorically unwilling to fund any entity officially designated as a foreign agent.

The Secrecy Covenants and Executive Concerns

The leaked files reveal an intense concern with maintaining the absolute confidentiality of the legal engagement. In a December 2019 email, Liat Glazer warned that if the partnership between the sovereign state and Sandler Reiff became public, it would spark accusations that the State of Israel was actively interfering in domestic U.S. affairs, severely damaging bilateral diplomatic relations. Glazer explicitly cautioned:

"Exposing the name of the law firm could thwart the entire relationship, as I understand it was agreed with them that the engagement with [Israel] would not be revealed."

This mandate of non-disclosure served to protect the "information barrier" necessary to prevent the DOJ FARA Unit from linking the legal advice directly to the operational execution of domestic advocacy campaigns. Concurrently, Dina Zilber, then-Deputy Attorney General of Israel, drafted internal guidance advising Kela Shlomo/Concert to route all state-backed financial matching subventions through newly incorporated domestic nonprofit intermediaries. This administrative decoupling, analyzed in *Foreign Agent Audit & Financial Tracing.pdf*, was designed to obscure the sovereign origin of the capital while preserving "informal coordination mechanisms"—specifically oral updates and unrecorded meetings—to maintain oversight without creating a discoverable paper trail.

Statutory Exemption Arbitrage Under 22 U.S.C. § 613

Academic Exemption Loophole Under Section 613(e)

To bypass the statutory definition of an "agent of a foreign principal" under 22 U.S.C. § 611(c), the sovereign-directed network heavily leveraged the "academic" exemption codified in 22 U.S.C. § 613(e). This statutory provision exempts any individual or entity engaging "only in activities in furtherance of bona fide religious, scholastic, academic, or scientific pursuits".

In 2018, the Ministry of Strategic Affairs authorized a direct grant of \$445,000 to the Institute for the Study of Global Antisemitism and Policy (ISGAP), an organization directed by Dr. Charles Asher Small. This sovereign subvention constituted approximately 80% of ISGAP's reported annual operating budget for that fiscal period, establishing a state-supported financial dependency. Dr. Small and ISGAP counsel repeatedly asserted that FARA registration was legally unnecessary because the organization's activities were confined to "bona fide scholastic and academic research" regarding foreign influence in American higher education.

However, the transactional and operational records analyzed in *Non-Profit Foreign Influence*

Investigation.pdf reveal a systematic convergence of academic research and political advocacy. ISGAP utilized its "Follow the Money" research project to directly lobby federal and state lawmakers. Specifically, ISGAP presented its findings directly to the DOJ in July 2019, sparking federal investigations into competitive sovereign funding of U.S. universities.

Furthermore, ISGAP took direct credit for orchestrating and providing the research utilized in the December 2023 congressional hearings on campus antisemitism, which directly preceded the resignations of elite university presidents. By engaging in regular meetings with congressional leaders to urge formal federal investigations of student demonstrators, ISGAP crossed the statutory boundary of "only" academic pursuits, demonstrating that the academic exemption is actively deployed as a shield for highly coordinated political influence operations.

The financial concentration of this sovereign subvention can be modeled to highlight its disproportionate impact on the target's operating capacity. Let C_a represent the sovereign funding concentration ratio:

$$C_a = \frac{S_f}{B_t}$$

Where S_f is the sovereign subvention (\$445,000) and B_t is the total annual budget of the domestic nonprofit (~ \$556,250) :

$$C_a = \frac{445,000}{556,250} = 0.80 \quad (80\%)$$

This extreme concentration illustrates that while the legal entity is nominally an independent academic institution, its baseline economic existence is directly derived from a foreign principal, testing the boundaries of the § 613(e) academic exemption.

Commercial and Private Exemption Loophole Under Section 613(d)

The second statutory loop utilized by the network is the commercial and private exemption codified in 22 U.S.C. § 613(d), which exempts activities in furtherance of "private and nonpolitical activities, or bona fide trade or commerce". The strategic deployment of this exemption was executed through the corporate structuring of Concert (formerly Kela Shlomo) as a public-private partnership (PPP).

By positioning Concert as a non-governmental, commercial-style joint venture, the Ministry of Strategic Affairs sought to classify its financial matching subventions as private commercial transactions. The internal memos of Liat Glazer and Dina Zilber indicate that the matching fund accounts were designed to execute "joint ventures" with U.S. nonprofit partners. If the matching capital was categorized as a private philanthropic or commercial co-investment, the domestic recipients could claim they were acting in furtherance of their own "private and nonpolitical" corporate missions under § 613(d), rather than acting as agents of a foreign state.

However, the operational reboot of Voices of Israel (Concert) on November 1, 2023—disclosed through Israeli government budget modifications—demonstrated the fundamentally political and sovereign nature of this entity. The state-backed firm froze all prior commercial and cultural matching campaigns to allocate 100% of its resources toward "winning the war over Israel's story" during the Gaza conflict. This pivot shows that the commercial/private structural designation under § 613(d) is maintained to bypass FARA disclosures during peacetime, while remaining fully subordinate to sovereign geopolitical directives during crises.

Intermediated Funding Architecture and Structural Decoupling

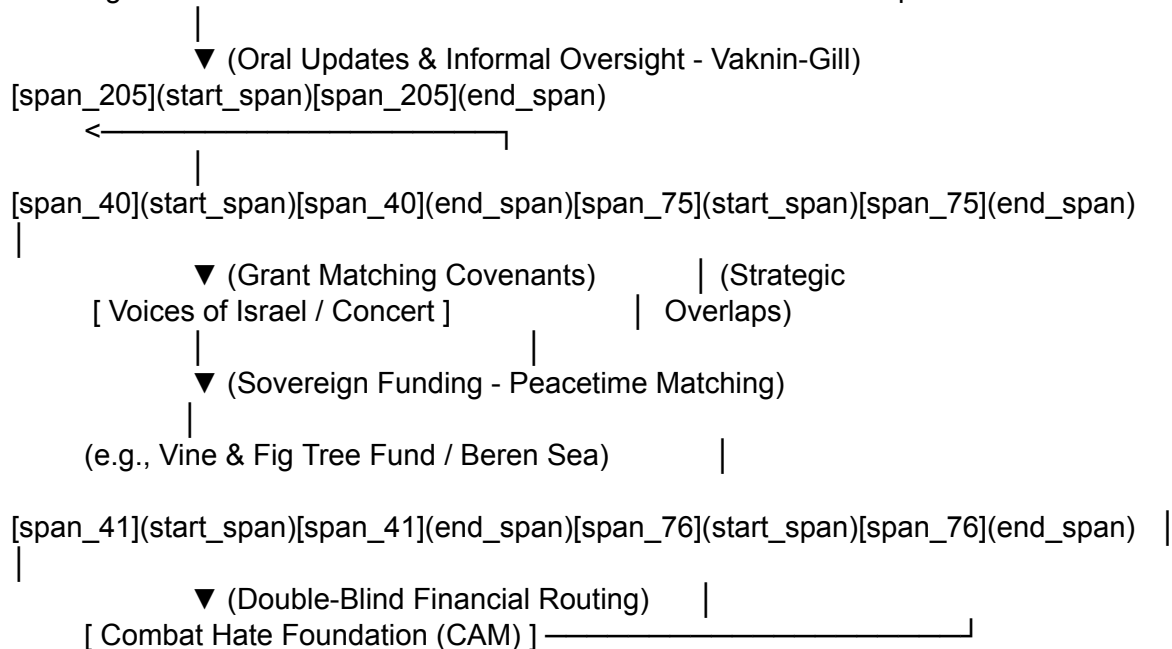
The Intermediary Mechanism

To sever the direct statutory chain of agency, the legal advisors implemented a complex, intermediated funding architecture designed to match sovereign capital with domestic advocates while preventing the DOJ from tracing the source. This mechanism relies on "double-blind" financial routing through domestic 501(c)(3) public charities and private foundations, preventing any direct contractual relationship between the foreign principal and the ultimate U.S. advocate. A primary operational node in this architecture is the Combat Hate Foundation, a 501(c)(3) nonprofit incorporated in 2019 and registered to Donna Stucky, Chief Financial Officer of the Kansas-based oil company Berexco, owned by Republican donor Adam Beren. The Combat Hate Foundation operates the Combat Antisemitism Movement (CAM), which coordinates an international coalition of approximately 700 organizations.

To insulate CAM from direct foreign-source funding indicators, the network established a domestic financial pipeline utilizing the Vine & Fig Tree Fund Inc. (New York EIN 99-2100887, CT Registry CHR.0069974) and its sister entity Vine & Fig Tree Action Inc. Controlled by board members A. Ari Gontownik, M. Michael Davis, and W. Weston Edwards, the Vine & Fig Tree Fund operates on a strict invitation-only basis, rejecting unsolicited proposals to preserve a closed funding loop.

According to financial ledgers analyzed in *Non-Profit Foreign Influence Investigation.pdf*, the Vine & Fig Tree Fund systematically channels capital to the Combat Hate Foundation, providing \$250,000 in FY 2024–2025 alone. This domestic matching capital is further augmented by direct contributions from the Beren Sea Foundation, which injected \$3,125,000 into the Combat Hate Foundation over the same period.

To maintain strategic alignment without triggering FARA's "direction or control" threshold, the network relies on overlapping board governance rather than written contracts. Sima Vaknin-Gill, the former Director-General of the Ministry of Strategic Affairs, was placed directly onto the board of the Combat Antisemitism Movement (CAM). This placement materialized the "informal oversight" model drafted by Liat Glazer, enabling direct, unrecorded coordination between the sovereign state's chief influence architect and the domestic U.S. nonprofit coalition.



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▼ (Goal-Aligned Independent Contracts)
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Forensic Distinction: FARA Homonyms in Public Registries

A forensic audit of state corporate filing systems and charity registries reveals the critical importance of distinguishing precise entity taxonomies to avoid analytical errors. For instance, public records in the State of New York and the State of California document a registered entity named "Filipino Americans for Racial Action" (FARA), founded by attorney Lara Gregory. This grassroots entity receives funding from California's "Stop the Hate" program, administered by the California State Library, to combat anti-Asian hate crimes.

While sharing the exact acronym of the federal statute (FARA), this domestic advocacy group is entirely unrelated to the Foreign Agents Registration Act public registry or any foreign principal, highlighting the necessity of clinical, multi-source verification when analyzing state-level public records to prevent false positives in foreign influence tracing.

Goal-Aligned Independent Contractor Contractual Disclaimers

The Legal Theory of Structural Decoupling

Under established U.S. agency jurisprudence, the Department of Justice cannot establish an agency relationship under FARA without proving two core elements: (1) assent by both the principal and the agent to enter a relationship, and (2) the agent acting under the "direction or control" of the principal.

To legally sever the "direction or control" element, Sandler Reiff and sovereign legal advisors developed a standardized, "courtroom-grade" contractual template for all third-party service agreements and grant covenants executed between sovereign matching funds and domestic U.S. advocates. As analyzed in *Policy Textual Variance Analysis.pdf*, these agreements are systematically framed as "cooperative and goal-aligned independent contracts" rather than partnerships, formal joint ventures, or agency relationships.

Contractual Disclaimer Template Text

The contractual boilerplate utilized across the Concert/Voices of Israel domestic subvention network contains the following precise, legally binding disclaimers:

Section 12. Independent Contractor Status and Severability of Agency. (a) *Status of Parties.* The parties hereto explicitly acknowledge and agree that this Agreement is executed solely to facilitate a cooperative, goal-aligned project of mutual interest. Under no circumstances shall this Agreement, the allocation of matching funds, or the exchange of operational data be interpreted, construed, or implied to create an agency, partnership, joint venture, employer-employee, or representative relationship between the Grantor (including any foreign public-private partnerships or sovereign affiliates) and the Recipient.

(b) *Absence of Direction or Control.* The Recipient shall retain sole, exclusive, and absolute discretion and control over the manner, methods, means, and execution of all programs, publications, research, and public campaigns funded under this Agreement. The Grantor does not possess, and shall not assert, any right or authority to command, direct, request, veto, or

supervise the specific daily operations, output, editorial decisions, or public statements of the Recipient.

(c) Independence of Corporate Mission. The parties declare that their collaboration is based entirely on a pre-existing, independently formulated alignment of their respective corporate missions. Any funding matched by the Grantor is categorized as an unrestricted contribution to a pre-existing, self-directed program of the Recipient, and the Recipient is under no obligation to act on behalf of, or under the instructions of, the Grantor or any foreign sovereign principal.

Jurisprudential Defense against DOJ Enforcement

These contractual disclaimers serve as an effective jurisprudential shield. By explicitly denying the right of control and framing all financial flows as contributions to pre-existing, "goal-aligned" domestic programs, the contract creates a formidable legal presumption of independence. If the DOJ FARA Unit attempts to initiate an enforcement action, the domestic defendant can present this contract as prima facie evidence that it retains total editorial and operational autonomy. To pierce this shield, the DOJ must meet an exceptionally high evidentiary standard, proving that the written contract is a sham and that de facto control was exerted through unrecorded, informal communications. Because the network systematically routes all critical directives through oral meetings and overlapping directors (such as Vaknin-Gill), it minimizes the creation of discoverable written evidence, successfully neutralizing FARA enforcement actions.

Comprehensive Timeline & Transactional Data Matrices

Table 1: Timeline of FARA Advisory, Corporate Structuring, and Operational Reboot (2017–2026)

| Date Range | Entity / Node Involved | Operational Event / Corporate Action | Strategic FARA / Regulatory Significance |
|------------------|--|---|--|
| 2017 | Ministry of Strategic Affairs (Israel) | Incorporation of "Kela Shlomo" (Solomon's Sling). | Creation of a public-private partnership (PPP) to execute covert overseas influence operations. |
| 2018 | Sandler Reiff P.C. / Concert | Formal retention of Joseph E. Sandler and Joshua I. Rosenstein. | Initiation of continuous FARA risk audits; Concert rebranded to bypass initial publicity. |
| July 2018 | Ministry Legal Advisors | Drafting of the July 2018 FARA Risk Memo. | Identified registration as fatal to reputation and funding; recommended intermediary structures. |
| 2018 | Ministry / ISGAP | Allocation of \$445,000 subvention to ISGAP | Execution of the Academic Exemption |

| Date Range | Entity / Node Involved | Operational Event / Corporate Action | Strategic FARA / Regulatory Significance |
|---------------------|--|---|--|
| | | (~80% of budget). | (22 U.S.C. § 613(e)) strategy. |
| July 2019 | ISGAP (Dr. Charles Asher Small) | Presentation of "Follow the Money" findings directly to the DOJ. | Strategic use of "academic" status to initiate federal investigations into university funding. |
| Dec 2019 | Liat Glazer (Ministry Counsel) | Leaked email demanding absolute secrecy of Sandler Reiff's role. | Prevention of public disclosures regarding coordinated foreign lobbying strategies. |
| 2019 | Combat Hate Foundation | Incorporation of Combat Hate Foundation in Moundridge, KS. | Establishment of the primary U.S. intermediary corporate node. |
| 2021 | Voices of Israel / Liat Glazer | Concert rebranded as "Voices of Israel" ; Liat Glazer joins Google Israel. | Evolution of the state-directed matching fund; Sima Vaknin-Gill joins CAM board. |
| 2018–2022 | Sandler Reiff P.C. | Continuous FARA analysis and structural shielding advisory. | Systematic drafting of goal-aligned independent contractor templates. |
| Dec 2023 | ISGAP / House GOP | Congressional hearings regarding elite university presidents. | Realization of political outcomes using "academic" research; direct policy manipulation. |
| Nov 2023 | Voices of Israel | State budget document freezes all non-war campaigns. | Pivot of the public-private partnership to emergency sovereign wartime messaging. |
| FY 2024–2026 | Combat Hate Foundation / Vine & Fig Tree | Execution of active matching grant cycles under independent contract disclaimers. | Current operation of the intermediated, double-blind financial pipeline. |

Table 2: Financial Flow Analysis and Matching Fund Logs

| Disbursing Entity | Intermediate Conduit | Ultimate Recipient Node | Disbursed Amount | Period | Regulatory / FARA Mitigation Function |
|------------------------------|----------------------|-----------------------------------|------------------|---------|---------------------------------------|
| Ministry of Strategic | None (Direct Grant) | Institute for the Study of Global | \$445,000 | FY 2018 | Exploits 22 U.S.C. § 613(e) |

| Disbursing Entity | Intermediate Conduit | Ultimate Recipient Node | Disbursed Amount | Period | Regulatory / FARA Mitigation Function |
|--------------------------------------|--------------------------------------|--------------------------------------|------------------------|--------------|---|
| Affairs | | Antisemitism and Policy (ISGAP) | | | Academic Exemption; provides 80% baseline operational funding. |
| Beren Sea Foundation | None (Private Trust) | Combat Hate Foundation (CAM) | \$3,125,000 | FY 2022–2024 | Matches and dilutes foreign-source indicators with high-value domestic capital. |
| Vine & Fig Tree Fund Inc. | None (Private Foundation) | Combat Hate Foundation | \$250,000 | FY 2024–2025 | Closed-loop, invitation-only domestic donation to sever direct sovereign tracing. |
| | Vine & Fig Tree Fund Inc. | None (Private Foundation) | The Philos Project Inc | \$100,000 | FY 2025 |
| Combat Hate Foundation | None (Direct Grant) | Network Contagion Research Institute | \$75,000 | FY 2022 | Subventions domestic research entities to generate scientific and analytical backing. |
| Combat Hate Foundation | Winning Strategies Washington | Federal Lawmakers / Agencies | \$35,000 | FY 2020 | Executes domestic federal lobbying campaigns via standard LDA-registered domestic agents. |

Table 3: Corporate Registry and Regulatory Profiles of Target Nodes

| Entity Name | Jurisdiction & Registry ID | Key Personnel & Board Members | FARA & Civil Liability Exposure Profile |
|---|--|--|---|
| Combat Hate Foundation | Kansas Corporate Registry / Tax ID: 84-2208774 | Adam Beren (Founder) , Donna Stucky (President) , Mikhail Galperin (Executive Director). | High risk due to Sima Vaknin-Gill's presence on the CAM governing board. Board-level overlap matches the "informal oversight" model drafted in leaked sovereign memos. |
| Vine & Fig Tree Fund Inc. | New York Corporate Registry / EIN: 99-2100887 | A. Ari Gontownik, M. Michael Davis, W. Weston Edwards. | Acts as a double-blind financial conduit; strictly rejects unsolicited proposals to preserve a closed funding loop. |
| ISGAP | New York 501(c)(3) | Dr. Charles Asher Small (Executive Director) | Highly exposed. Relies on the § 613(e) academic exemption, but its active legislative lobbying and congressional coordination violate the "only" academic proviso of the statute. |
| Sandler Reiff Lamb Rosenstein & Birkenstock P.C. | District of Columbia Bar / Corporate Registry | Joseph E. Sandler, Joshua I. Rosenstein. | Exposed to public relations fallout and congressional inquiries regarding the structuring of FARA circumvention networks for a foreign sovereign. |

Strategic Assessment and Conclusions

The structural decoupling strategy engineered by Sandler Reiff P.C. and Israeli Ministry legal advisers has successfully exploited the statutory grey areas of 22 U.S.C. § 611 et seq.. By substituting direct, sovereign-to-advocate funding with intermediated, double-blind domestic matching grants, the network has successfully elevated the evidentiary threshold required for the DOJ FARA Unit to establish de jure agency. Furthermore, the implementation of "goal-aligned independent contractor" templates contractually strips the DOJ of its ability to prove the "direction or control" element essential to FARA prosecutions.

However, the architecture possesses two critical legal vulnerabilities:

First, ISGAP's reliance on the academic exemption under § 613(e) is highly vulnerable to regulatory challenge. Because ISGAP has transitioned from basic academic research to active, aggressive lobbying—including meeting with congressional leaders, orchestrating the ouster of university presidents, and demanding criminal investigations into student demonstrators—it has effectively exceeded the statutory "only" academic limitation.

Second, the physical board placement of Sima Vaknin-Gill, the former Director-General of the

Ministry of Strategic Affairs, onto the board of the Combat Antisemitism Movement (CAM) represents a significant compliance failure. Vaknin-Gill's historical role in creating Kela Shlomo (Concert) and the leaked FARA-evasion guidelines creates a direct, human link to a foreign principal.

If the DOJ FARA Unit exercises its subpoena power to retrieve internal emails, text messages, or notes detailing "oral updates" and "informal coordination" between Vaknin-Gill and active Israeli Ministry officials, the written "independent contractor" disclaimers will be pierced. Under such a scenario, the court would look past the form of the contract to the substance of the relationship, establishing de facto foreign direction and control, and forcing mandatory FARA registration across the entire domestic network.

Works cited

1. Israel feared legal trouble over US advocacy efforts, leaked files suggest - The Guardian, <https://www.theguardian.com/world/article/2024/aug/17/israel-foreign-agent-law-leaked-documents>
2. Israeli documents show expansive government effort to shape US discourse around Gaza war | Israel | The Guardian, <https://www.theguardian.com/world/article/2024/jun/24/israel-fund-us-university-protest-gaza-antisemitism>
3. עתירה מנהלית - העין השביעית, <https://cdn.the7eye.org/uploads/2025/11/lawsuit37276-10-25.pdf>
4. Israel sought to evade US law on foreign lobbying, leak shows | Arab News, <https://www.arabnews.com/node/2567787/amp>
5. Combat Hate Foundation - Influence Watch, <https://www.influencewatch.org/non-profit/combat-hate-foundation/>
6. VINE & FIG TREE FUND INC (EIN 99-2100887) - Grants, Funding, 990s - Impala Digital, <https://impala.digital/public/profiles/99-2100887/overview>
7. תוכן עניינים : רשימת נספחים - התנועה - לחופש המידע, <https://www.meida.org.il/wp-content/uploads/2025/05/Shikli-Influencers-Petition-Appendices.pdf>
8. Follow the Money: Qatar and the Muslim Brotherhood Funding of Higher Education in the United States - ISGAP, <https://isgap.org/follow-the-money/>
9. FOREIGN INFLUENCE AND ANTI- ISRAEL BIAS IN K-12 CLASSROOMS - ISGAP, https://isgap.org/wp-content/uploads/2025/03/K12_Report_Final_20250310.pdf
10. Combat Antisemitism Movement - Wikipedia, https://de.wikipedia.org/wiki/Combat_Antisemitism_Movement
11. Truth in Testimony Disclosure Form, <https://docs.house.gov/meetings/FA/FA06/20230622/116138/HHRG-118-FA06-TTF-SharanskyN-20230622.pdf>
12. LAP + Lara Gregory - New York City Bar Association, <https://www.nycbar.org/wp-content/uploads/2024/06/Lara-Gregory-Podcast-Transcript.pdf>
13. Against Hate: A Hongbao from NY Governor Hochul in the Year of the Dragon, <https://www.positivelyfilipino.com/act-against-hate/a-hongbao-ny-governor-hochul>