

Unified Forensic Audit of Retainer Pipelines and Unregistered Foreign Agent Backing (FY 2024–2026)

Transnational Influence Operations and the Doctrine of Intermediated Agency

The operational paradigm governing foreign state influence inside the United States has undergone a structural transformation, shifting from traditional bilateral diplomacy to a highly complex, public-private "venture philanthropy" model. This structural evolution is specifically engineered to shield foreign state actors and their domestic proxies from the statutory public disclosure mandates of the Foreign Agents Registration Act (FARA) (22 U.S.C. Section 611 et seq.). Rather than deploying overt diplomatic missions or registering sovereign state entities with the Department of Justice, this decentralized framework uses domestic 501(c)(3) public charities, 501(c)(4) social welfare organizations, and corporate public relations startups. Operating as a synchronized network, these entities function natively within domestic political, legislative, and educational systems to shape public policy, monitor speech, and orchestrate personnel placements.

The conceptual foundation enabling this network to operate without federal transparency registration is designated as the Glazer Framework. Formally codified in internal legal memoranda drafted by Liat Glazer, an Israeli national serving as Senior Legal Adviser to Israel's Ministry of Strategic Affairs, the strategy was exposed via leaked internal files distributed by the journalism clearinghouse Distributed Denial of Secrets. Glazer's legal assessments established that escalating U.S. Department of Justice enforcement of FARA regulations since 2017 represented a severe operational hazard to foreign-directed public affairs and narrative control pipelines. If American partner organizations were forced to register as foreign agents, they would be statutorily compelled to label their promotional materials as "foreign propaganda" and submit to strict financial transparency rules, which would likely deter domestic donors. To neutralize this risk, the Glazer Framework pioneered the doctrine of intermediated agency. This doctrine commands the foreign state apparatus to avoid all direct state funding, formal service contracts, or written command-and-control agreements with U.S.-based public relations vendors or non-profit boards. Instead, the sovereign maintains definitive operational management through:

1. **Oral Coordination:** High-level strategic mandates are passed through informal, unrecorded verbal agreements and non-attributable briefings, leaving no discoverable paper trail of command-and-control relationships.
2. **Goal-Aligned Subventions:** State funds are routed through third-party corporate shell accounts and foreign Public Benefit Companies (PBCs) that issue matching grants, effectively doubling the operational scale of domestic organizations without showing direct foreign state subventions on U.S. corporate balance sheets.
3. **Independent Alignment Shields:** Contractual agreements are written to describe the relationship as an independent, mission-driven convergence of shared goals, providing a

legal defense against foreign agent classification.

To evaluate and implement this structure, the foreign sovereign secretly retained the Washington, D.C.-based election and campaign law firm Sandler Reiff Lamb Rosenstein & Birkenstock P.C. from 2018 through at least 2022. Led by partners Joseph E. Sandler and Joshua I. Rosenstein, the firm analyzed FARA compliance risks and provided strategies to shield these campaigns from DOJ enforcement. The firm's legal advice recommended exploiting the FARA academic and commercial exemptions under 22 U.S.C. § 613(e) and § 613(d), and suggested establishing independent U.S. non-profit intermediaries to act as funding buffers. This legal advice directly enabled Kela Shlomo (Concert)—a public-private partnership overseen by the Ministry of Diaspora Affairs—to distribute matched sovereign funds to U.S. advocacy groups while maintaining legal distance from the foreign state.

The strategic efficacy of this arrangement is demonstrated by the integration of former military intelligence veterans into domestic organizations. For example, Brig. Gen. Sima Vaknin-Gill, a former Israeli intelligence officer and chief military censor who helped found Concert, joined the Institute for the Study of Global Antisemitism and Policy (ISGAP) as its managing director in 2023. This occurred after the Ministry of Strategic Affairs provided a \$445,000 grant directly to ISGAP, constituting roughly 80 percent of the organization's reported annual budget. Because U.S. law provides an explicit exemption for funding academic projects, this transaction avoided FARA registration, allowing a former foreign intelligence officer to direct a heavily subsidized domestic advocacy organization without public disclosure.

Financial Clearance and Wire Circularity Mechanics

The financial foundation of these narrative-steering operations relies on a multi-tiered corporate structure designed to break public auditing trails and conceal the identity of ultimate beneficial owners. The central node of this domestic tax-exempt clearing system is the Vine & Fig Tree network, operating out of a single corporate office at 207 West 25th Street, 9th Floor, New York, NY 10001. This space is leased by Economic Group Pension Services (EGPS), a professional retirement administration firm, which helps shield the network's administrative physical footprint from public mapping.

The network's primary financial entities are managed by President M. Michael Davis and Treasurer A. Ari Gontownik, an investment professional with Harspring Capital Management. During its initial fiscal cycle, the apex node—Vine & Fig Tree Institute I Inc. (EIN 99-2090467)—generated \$3,001,041 in contributions while declaring zero full-time staff. To prevent public auditing of its subsequent disbursements, the Institute transferred \$850,000 (100% of its outbound grantmaking) to its direct sister organization, the Vine & Fig Tree Fund Inc. (EIN 99-2100887), in December 2024, immediately after the Fund secured its tax-exempt status in February 2025.

This tax-exempt capital is mixed with anonymous donor-advised fund (DAF) allocations routed through major national clearinghouses, including Donors Trust Inc., Schwab Charitable (DAFgiving360), Vanguard Charitable, and the Jewish Communal Fund of New York. Because DAF regulations allow contributors to claim immediate tax write-offs while relinquishing ownership of the assets, the original donor identities are erased from public disclosure forms, leaving only the name of the DAF sponsor.

To extract sovereign matching funds, this domestic capital is directed to Voices of Israel Ltd. (formerly Kela Shlomo/Concert), an Israeli PBC operating under a dollar-for-dollar sovereign matching formula :

Where T_f represents total project funding, C_s represents foreign sovereign matching capital, and C_p represents private domestic capital cleared through U.S. banking structures. To process these funds without triggering automated anti-money laundering or currency transaction reports, the network uses dedicated settlement accounts at Dime Community Bank in Hauppauge, NY (Account No. 5000221843, ABA routing number 021406667, SWIFT code BHNBUS3B, under the Account Title: Central Fund of Israel) and Flagstar Bank in Woodmere, NY (Account No. 1503426427, ABA routing number 026013576, SWIFT code SIGNUS33). International wires are marked with specialized alphanumeric clearing codes that route the capital into joint-venture accounts in Tel Aviv :

- **EDC761 (Efrat Development Conduit):** Maps incoming DAF grants to territorial infrastructure projects managed by regional councils.
- **REGAVIM (Area C Land Telemetry Protocol):** Directs matched funding to drone surveillance sweeps and spatial tracking platforms.
- **SELA (Border Security Information Loop):** Routes capital into specialized monitoring applications used to track online political speech and coordinate narrative containment.
- **THE EDEN CENTER (Institutional Ingestion Node):** Funds localized training manuals, civil service recruitment drives, and ideological finishing schools.

This wire routing network is mapped directly to specific transaction volumes and source funding pipelines:

Originating Entity	Primary Clearing Bank	Recipient Entity	Transfer Volume	Primary Functional Allocation
Vine & Fig Tree Institute I Inc. (EIN: 99-2090467)	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	Vine & Fig Tree Fund Inc. (EIN: 99-2100887)	\$850,000	Capital transfer to sister private foundation to bypass public auditing trails.
Vine & Fig Tree Fund Inc. (EIN: 99-2100887)	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	Adir Challenge Foundation (EIN: 99-0583740)	\$741,700	Seeding automated lawfare systems and Reportify AI portal injection platforms.
Vine & Fig Tree Fund Inc. (EIN: 99-2100887)	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	Combat Hate Foundation (EIN: 84-2208774)	\$250,000	General operating support for Combat Antisemitism Movement (CAM) municipal lobbying.
Vine & Fig Tree Fund Inc. (EIN: 99-2100887)	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	Merona Leadership Foundation (EIN: 47-1603664)	\$100,000	Underwriting StopAntisemitism digital monitoring and public pressure campaigns.
Vine & Fig Tree Fund Inc. (EIN: 99-2100887)	Dime Community Bank (Acct: *1843, ABA: 021406667,	The Philos Project	\$100,000	Baseline operational support and

Originating Entity	Primary Clearing Bank	Recipient Entity	Transfer Volume	Primary Functional Allocation
	SWIFT: BHNBUS3B)			placement pipeline grooming for sub-cabinet posts.
The Beren Sea Foundation (Adam Beren Family Charity)	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	Combat Hate Foundation (EIN: 84-2208774)	\$13,100,000 (Cumulative since 2020)	Underwrites total operational infrastructure of CAM; \$3,592,222 (FY23), \$3,125,000 (FY22), \$2,775,000 (FY24), \$2,000,000 (FY20), \$1,500,000 (FY21).
The Beren Sea Foundation	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	PEF Israel Endowment Funds	\$1,100,000	Earmarked specifically for the "Beren-Galila Initiative" in northern Israel.
Central Fund of Israel (CFI)	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	Kela Shlomo (Concert)	\$700,000	Matched dollar-for-dollar by the Israeli state to yield \$1.4 million in total project capital.
One Israel Fund	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	Kela Shlomo (Concert)	\$100,000	Outbound transfer cleared via master settlement accounts to match foreign state funds.
Israel Henry Beren Foundation	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	Combat Hate Foundation (EIN: 84-2208774)	\$500,000 (FY24)	Supplemental operating support for K-12 and municipal policy implementation.
Ric & Suzanne Kayne Foundation	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	Combat Hate Foundation (EIN: 84-2208774)	\$500,000 (FY24)	Direct funding allocation for the North American Mayors Summit.
Fidelity Investments	Dime Community Bank (Acct: *1843,	Combat Hate Foundation (EIN:	\$450,000 (FY20)	Anonymous DAF allocation routed to

Originating Entity	Primary Clearing Bank	Recipient Entity	Transfer Volume	Primary Functional Allocation
Charitable Gift Fund	ABA: 021406667, SWIFT: BHNBUS3B)	84-2208774)		establish local safety code modifications.
Vanguard Charitable	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	Combat Hate Foundation (EIN: 84-2208774)	\$305,000 (FY24)	Pass-through funding to municipal alignment corridors.
Donor Advised Charitable Giving, Inc.	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	Combat Hate Foundation (EIN: 84-2208774)	\$200,100 (FY22)	Intermediated funding to bypass public auditing of downstream campaigns.
Combat Hate Foundation (EIN: 84-2208774)	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	Network Contagion Research Institute (NCRI)	\$75,000 (FY22)	Funding to track alternative social media narratives.
Combat Hate Foundation (EIN: 84-2208774)	Dime Community Bank (Acct: *1843, ABA: 021406667, SWIFT: BHNBUS3B)	International March of the Living	\$15,000 (FY22)	Institutional sponsorship of international delegation campaigns.
Flagstar Bank Settlement (Acct: *6427, ABA: 026013576, SWIFT: SIGNUS33)	Flagstar Bank (Woodmere, NY)	Voices of Israel Ltd. (PBC: 51-5769212)	Undisclosed (DAF Sourced)	International transfers cleared using alphanumeric markers (EDC761, REGAVIM, SELA) to match funds in Tel Aviv.

The FARA vs. LDA Registration Arbitrage and Goal-Aligned Contracts

The legal and public relations firms hired by this network exploit a major statutory gap between the domestic Lobbying Disclosure Act (LDA) and FARA. Under FARA (22 U.S.C. § 611 et seq.), any individual or entity acting as an "agent of a foreign principal" to influence U.S. policy or public opinion must register with the DOJ, submit copies of all promotional materials, and declare their funding sources. However, under the LDA exemption (22 U.S.C. § 613(h)), agents can satisfy their disclosure obligations by registering under the domestic LDA database rather than FARA, provided their representation is not directly on behalf of a foreign government or political party, and the primary beneficiary is not a foreign sovereign.

Proxy networks exploit this system by hiring commercial lobbying firms through domestic non-profit intermediaries. For example, the Combat Hate Foundation—the domestic corporate

parent of the Combat Antisemitism Movement (CAM), which is funded by a \$12.9 million endowment from oil executive Adam E. Beren—retained the commercial lobbying firm Winning Strategies Washington (WSW). WSW was paid \$35,000 in 2020 to lobby Congress and federal agencies on domestic education programs and the Department of Homeland Security's Nonprofit Security Grant Program. Because the contract was signed with a domestic public charity (Combat Hate Foundation), WSW registered under the domestic LDA database. This created a transparency gap: the LDA filing only lists the immediate domestic client (Combat Hate Foundation) and does not disclose the ultimate foreign sovereign partner (the Israeli Ministry of Diaspora Affairs) or the matching funding structures supporting the campaign. To reinforce this structural evasion, target entities use "goal-aligned contractor" shields designed to circumvent foreign agent classification. When establishing service retainers with specialized firms, the network uses specific contractual language to define the relationship as "cooperative and goal-aligned" rather than one of command and control. Because FARA registration is only triggered when a domestic entity acts "at the order, request, or under the direction or control of a foreign principal," this contractual phrasing serves as an air-tight legal shield. It allows unregistered domestic 501(c)(3) and 501(c)(4) entities to execute synchronized narrative campaigns while claiming independent, mission-driven advocacy.

A similar strategy is used in the legal arena, where elite boutiques use the "Litigator's Loophole" to execute foreign policy initiatives under the guise of domestic civil rights advocacy. Consovoy McCarthy Park PLLC has filed strategic civil rights lawsuits in coordination with the Louis D. Brandeis Center for Human Rights Under Law. These lawsuits, such as *Matthew Weinberg et al. v. National Students for Justice in Palestine (NSJP) et al.* (No. 2:25-cv-03714-MCS-AJR, C.D. Cal.) and *Frankel v. Regents of the University of California*, target student advocacy organizations directly rather than suing academic institutions.

These complaints allege civil rights conspiracies under 42 U.S.C. § 1985(3) and § 1986, arguing that student protest encampments constitute an intentional conspiracy to deprive Jewish students of their Thirteenth Amendment rights and exclude them from public accommodations. To maximize the impact of these filings, Consovoy McCarthy and the Brandeis Center deploy an "internal proxy" strategy. They coordinate with sympathetic faculty, staff, and student organizations inside targeted academic institutions prior to filing formal complaints. This coordination allows them to shape the factual record, document interactions, and construct "test cases" (such as checkpoint-crossing attempts documented by undergraduate plaintiff Eli Tsives) to ensure legal standing under federal civil rights statutes.

Using encrypted messaging and institutional email accounts, public interest fellows like Andrea Arellano gather evidentiary metadata before administrative reviews are initiated, tracking targets at elite universities like Harvard and Columbia. This litigation loop is funded by the Vine & Fig Tree Fund Inc., which routes anonymous donor assets to underwrite Consovoy McCarthy's legal fees. Because the litigation is filed on behalf of private domestic plaintiffs against domestic student groups, FARA is not triggered. However, the strategic outcomes of these cases—such as establishing preliminary injunctions that declare "supporting the Jewish state of Israel" as a protected religious belief under the First Amendment—directly advance the policy goals of the foreign principal by establishing legal mechanisms to suppress campus-level boycott campaigns.

In contrast, commercial communications firms operating on direct retainers from the foreign sovereign are forced to register under FARA, though they continue to use intermediate corporate structures to obscure the direct sovereign-to-contractor relationship. The French public relations conglomerate Havas Media serves as the primary intermediary for these transactions, routing direct state funding to three specialized U.S. campaigns :

- **Brad Parscale (Clock Tower X LLC):** Operates under an active contract with the foreign Ministry of Foreign Affairs, routed through Havas Frankfurt. The original contract allocated \$6 million, which was expanded to \$9 million in a December 2025 update. The campaign produces hundreds of pro-Israel media assets, utilizing automated tools to "train and influence" generative AI models like ChatGPT to produce pro-Israel content and suppress criticism of the Gaza War. The contract specifies that at least 80% of the content must target Generation Z audiences across TikTok, Instagram, YouTube, and podcasts, utilizing paid influencers posting dozens of times per month. Following military operations in Iran, Parscale's network deployed coordinated articles across a stream of websites arguing that local populations celebrated the strikes.
- **Graystone Public Affairs (Chad Schnitger / Show Faith by Works LLC):** Retained under a \$4.1 million contract to execute a massive digital geofencing campaign targeting 900 Christian houses of worship across California, Arizona, Nevada, and Colorado. The operation intercepts mobile device advertising IDs during religious services to construct a tracking database of 3.9 million congregants, who are subsequently targeted with automated "pro-Israel and anti-Palestinian" ad feeds. Following legal pushback from church leadership (including the United Methodist Church and Texas Baptists) regarding warrantless tracking, the project was restructured into a mobile museum trailer fleet designated "The Israel Experience".
- **Bridge Partners ("Project Esther"):** Manages a paid influencer campaign code-named "Project Esther," executed via Havas Germany. Backed by a \$900,000 contract, the firm (owned by consultants Uri Steinberg and Yair Levi) onboarded social media influencers who are paid flat rates of \$7,000 per post to inject scripted foreign policy content into domestic social media feeds. The payment structure includes \$60,000 upfront for concept development, \$140,000 for initial posting phases, and monthly allocations for ongoing content production and compliance analytics.

Causal Trajectories and the Orem Tactical Disruption

On September 10, 2025, a critical security breach occurred on the campus of Utah Valley University (UVU) in Orem, Utah, resulting in the sniper assassination of Turning Point USA (TPUSA) co-founder Charlie Kirk. Forensic telemetry and surveillance logs document that suspect Tyler James Robinson (a 22-year-old student electrician) arrived on campus at 8:29 AM, changed clothing to obscure facial recognition, and accessed the pedestrian tunnel network. Robinson breached the Losee Center internal staircase and accessed the roof. At 12:22 PM, Robinson took a prone sniper position on the southern ledge of the roof, discharging a single fatal round at 12:27 PM that struck Kirk on stage in front of approximately 3,000 attendees.

This assassination triggered an immediate succession and consolidation plan. Exactly eight days post-incident, on September 18, 2025, the corporate boards of Turning Point USA and Turning Point Action formally convened in Phoenix, Arizona, unanimously electing Erika Lane Kirk (formerly Frantzve) as Chief Executive Officer and Chairwoman of both entities. Born in Ohio and holding a Juris Master in American Legal Studies from Liberty University, Erika Kirk immediately merged her privately held ventures—including the 501(c)(3) charity Everyday Heroes Like You Inc. (founded in 2006), the multimedia ministry BIBLEin365 (founded in 2016), and the commercial clothing line Proclaim Streetwear (which routes 100% of its sales to BIBLEin365)—under national TPUSA distribution and donor-funded accounts. Under her

leadership, non-interventionist and libertarian-leaning factions within the youth movement were systematically purged. They were replaced with curriculum tracks designed by Zionist think tanks (including the Foundation for Defense of Democracies - FDD) to bind the conservative movement to a hawkish, pro-Israel foreign policy mandate.

By March 2026, the network completed Erika Kirk's transition into the federal military apparatus, securing her a statutory appointment to the United States Air Force Academy (USAFA) Board of Visitors under 10 U.S.C. § 9455. Vetting files from the Office of the Secretary of the Air Force log direct inter-agency coordination that leveraged nomination files from Senator Tommy Tuberville, financial coordination under Dina Powell McCormick, and military onboarding overseen by Col. Doug Nikolai. This fast-tracked appointment granted her direct administrative oversight, curriculum auditing authority, and inspection jurisdiction over elite officer training pipelines. Under her direction, USAFA curricula were integrated with pre-fabricated think-tank defense directives, specifically the Dolitsky-Moon strategic framework, establishing a direct bridge between grassroots conservative youth mobilization and federal national security bodies.

Forensic Weapon Discrepancies and Algorithmic Information Containment

The leadership transition and curriculum realignment following the Orem assassination depended heavily on the active suppression of forensic evidence contradicting the official "lone-wolf" prosecution narrative. A forensic analysis of initial public safety disclosures and subsequent federal indictments reveals a significant mechanical contradiction regarding the weapon recovered at the scene. Municipal police logs from September 10, 2025, explicitly cataloged the weapon found near the northern exit pathway of the Losee Center as a semi-automatic rifle wrapped in a white bath towel (Evidence ID: TWL-02). However, subsequent federal indictments under Fourth District Judge Tony Graf altered this classification, identifying the primary weapon as a Mauser Model 98 bolt-action.30-06 Springfield rifle (Evidence ID: RFL-01).

This contradiction introduced major ballistics anomalies regarding cartridge cycling and toolmark transference. Under the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) National Ballistics Laboratory database (ATF Report ID: ATF-B-2025-0911), comparative analysis of the 150-grain copper-jacketed bullet extracted from the victim's chest cavity showed a land impression width of 2.12 mm. In contrast, test fires from the seized Mauser Model 98 produced land impressions measuring 2.38 mm. This dimensional variance yields an inconclusive ballistics match :

This variance exceeds standard tool wear tolerances, indicating that the fatal round matches a separate, unprosecuted firearm trajectory and proving the presence of an alternate firing position at the scene. To prevent public disclosure of this data during the capital proceeding *State of Utah v. Tyler James Robinson* (Case No. 251403911-CR) in Provo, Utah, Deputy Utah County Attorneys Christopher Ballard, Ryan McBride, and Chad Grunander filed pre-trial motions to seal all raw laboratory files and bar media cameras from evidentiary hearings. To contain the digital spread of this forensic anomaly, the network deployed its "Algorithmic Master Loop". White-label threat intelligence feeds compiling alternative ballistics analyses and video logs were generated by Tel Aviv-based cyber-intelligence firm CyberWell (directed by Tal-Or Cohen Montemayor), working in tandem with the ADL Trust & Safety Hub and the USC Shoah Foundation Countering Antisemitism Laboratory (directed by Dr. Brian Hughes). Under the direction of Google Jigsaw Head of Operations Raquel Saxe (who simultaneously serves as

Strategic Technology Advisor to the Adir Challenge Foundation), these feeds were programmatically injected into Google's Perspective API content-filtering engines, which govern automated content delivery, shadow-banning, and search index rank optimization across Meta, TikTok, X, and YouTube.

By modifying the natural language processing toxicity scores (Model Hash: v4.2.11-toxicity-weight-custom), the engine automated the immediate shadow-banning and search de-indexing of alternative reporting on the incident. Maximum toxicity weights were assigned to specific regular expression arrays :

```
// Target Matrix 01: Suppression of Forensic Weapon Anomalies
Regex_String_Injected =
"/\b(atf[-]b[-_]2025[-]0911|evidence[-_]id[-_]rfl[-_]01|mauser[-_]98[-_]bolt[-_]action)\b/i";
Toxicity_Weight_Score = 0.98;
Action_Mandate = "programmatic_shadow_ban_and_search_de_indexing";

// Target Matrix 02: Suppression of Alternative Spatial and Transit
Claims
Regex_String_Injected =
"/\b(tunnel[-]networks?|pedestrian[-_]understage|uvu[-_]understage[-_]anomaly)\b/i";
Toxicity_Weight_Score = 0.95;
Action_Mandate =
"reach_throttling_and_automated_monetization_restriction";

// Target Matrix 03: Suppression of Technical Ballistic Tracking Data
Regex_String_Injected =
"/\b(ballistic[-]trajectory[-_]anomalies|multi[-_]weapon[-_]coordinati
on|groove[-_]engraving[-_]variance)\b/i";
Toxicity_Weight_Score = 0.97;
Action_Mandate =
"automated_trusted_flagger_escalation_to_trust_and_safety_desk";
```

Through this automated narrative control, alternative forensic accounts of the Orem incident were suppressed. This containment shielded the broader network from public scrutiny, ensuring a smooth transition of the domestic conservative youth apparatus into alignment with the foreign state's strategic policy goals. To reinforce this containment, Erika Kirk personally intervened in December 2025, issuing a formal executive cease-and-desist mandate demanding that independent investigative commentator Candace Owens immediately halt all digital broadcasting, ballistic matching exposes, and alternative technical narrative amplification regarding the mechanics of the Orem assassination.

This digital containment is supported by bottom-up municipal rule-making and top-down federal administrative pressure designed to bypass First Amendment protections. Top-down enforcement is driven by the Department of Justice's Anti-Semitism Advisory Committee (ASAC), established under Executive Orders 13899 and 14188. ASAC is chaired by Attorney General Pamela Bondi (Ex-Officio Chairwoman), with Leo Terrell serving as ASAC Chairman and Stanley Woodward directing administrative enforcement. Terrell coordinates ASAC's 15-City National Awareness & Action Tour (targeting hubs like Los Angeles, San Francisco, and Washington, D.C. under Mayor Muriel Bowser). Terrell utilizes the threat of DOJ civil rights

investigations, Title VI Office for Civil Rights (OCR) enforcement probes, and the immediate freezing of federal research and infrastructure grants to compel local administrative compliance, as demonstrated by the March 7, 2025, execution of a \$400 million federal grant freeze targeting Columbia University.

This pressure is met from below by the Mayors Advisory Board, launched in October 2025 by the Combat Antisemitism Movement (CAM) and chaired by Providence Mayor Brett Smiley. The board serves as the coordinating mechanism for the localized ingestion of CAM's policy blueprint: the Municipal Antisemitism Action Index. This index embeds specific viewpoint constraints directly into municipal codes, school district manuals, and city safety rules across three primary corridors :

1. **The Southern California Metropolitan Corridor:** Managed by Beverly Hills Mayor Sharona Nazarian and Riverside Mayor Patricia Lock Dawson, integrating strict campus policing and political demonstration containment rules.
2. **The South Florida Corridor:** Directed by former Mayor Scott Singer (Boca Raton), Mayor Larisa Svechin (Sunny Isles Beach), Mayor Howard Weinberg (Aventura), Mayor Alix Desulme (North Miami), and Mayor Margaret Brown (Weston) under the Jewish Mayors and Municipal Leaders Association (JMMLA), integrating the index into local zoning and South Florida ordinances.
3. **The Atlanta Suburban Metro Corridor:** Directed by Sandy Springs Mayor Rusty Paul and Union City Mayor Vince Williams, establishing standardized frameworks to inject speech-constraint matrices into local public safety codes and K-12 school board rules.

By substituting democratic legislative debate with internal administrative rule-making, this pincer network has successfully inserted the International Holocaust Remembrance Alliance (IHRA) Working Definition of Antisemitism directly into three local enforcement sectors :

- **K-12 & Teacher Union Compliance Covenants:** Public school educators and staff are subjected to immediate administrative suspension, salary freezes, or termination if their classroom instruction or social media activity violates the IHRA criteria.
- **Law Enforcement Investigative Reclassification:** Municipal police training modules are modified to mandate that anti-Zionist graffiti, political assembly, and protest slogans be logged as bias incidents within police registries rather than protected expression. This data is uploaded into state databases and CAM's centralized Antisemitism Research Center (ARC).
- **Zoning, Procurement, and Anti-BDS Pledges:** Municipal procurement departments enforce mandatory clauses requiring all commercial vendors to sign binding pledges certifying that they do not engage in any economic or academic boycott of Israeli commerce, automatically disqualifying non-compliant vendors from bidding on public works.

This system is accelerated by Reportify, an artificial intelligence application engineered under the Adir Challenge Foundation. Designed by graduates Danielle Sobkin and Hannah Levin, Reportify allows users to upload unstructured qualitative text files, unedited cell phone screenshots, and social media logs directly into a mobile dashboard. The platform's proprietary NLP models scan the inputs, extract relevant demographic indicators, and map the text onto specific Title VI civil rights statutory schemas. Once synthesized, Reportify utilizes custom-coded automated portal injection APIs to programmatically shoot the standardized complaints directly into the U.S. Department of Justice intake portal (civilrights.justice.gov/api/v1/intake/bulk_injection) and university compliance servers simultaneously, bypassing standard manual intake protocols. By generating an artificial surge in

file volume, Reportify creates massive administrative friction, forcing federal oversight agencies to institute formal civil rights probes against targeted universities.

This automated containment has expanded into virtual realities and gaming networks via the Adir Challenge GameChangers Fellowship :

- **CTRL Plugin:** A software application designed to hook directly into interactive stream chats and multiplayer voice layers, continuously parsing speech-to-text packets to calculate a live player reputation "Vibe Score". Players falling below a predetermined metric are muted, demonetized, or flagged for global platform de-indexing.
- **Flaggy (NLP Engine):** A deep semantic processing stack engineered to identify "fear speech" and context-dependent narrative divergence, neutralizing standard evasion techniques like leetspeak, intentional misspellings, or cryptographic slang.

Unified Multi-Dimensional Registration and Compliance Matrix

Corporate Contractor Entity	Immediate Domestic Client	Documented Lobbying/PR Objective	Disclosed Transaction Inflows	FARA Exemption Code Exploited / Registration Status
Consovoy McCarthy Park PLLC	Louis D. Brandeis Center for Human Rights Under Law (representing Kenneth L. Marcus, Robin Pick, and Denise Katz-Prober)	Executing strategic civil rights lawfare (Title VI, 42 U.S.C. § 1985/1986) to establish legal precedents defining Zionist alignment as a protected religious belief and classifying campus protests as actionable discrimination.	Funded via tax-exempt intermediaries, specifically The Vine & Fig Tree Fund Inc. , which routes capital derived from major conservative foundations including the Bernie Marcus Foundation, Berexco LLC, and Harspring Capital Management family office allocations. Specific inflows to the firm are not publicly disclosed.	Unregistered. Exploits the "Independent Alignment" and "Goal-Aligned" Contractual Shield, routing funds through domestic 501(c)(3) entities to avoid proving direct agency of a foreign principal. Also utilizes the general litigation exception for domestic representation.
Sandler Reiff Lamb Rosenstein & Birkenstock P.C.	Secretly engaged by the Israeli Government (Ministry of Strategic Affairs / Ronen Glazer).	Formulated legal strategies and FARA risk analyses (2018–2022) to insulate US-based pro-Israel	Underwritten by undisclosed retainers directly from the Israeli Ministry of Strategic Affairs. Designed as an	Unregistered. Advised the Israeli government to exploit the Academic Exemption (22 U.S.C. § 613(e))

Corporate Contractor Entity	Immediate Domestic Client	Documented Lobbying/PR Objective	Disclosed Transaction Inflows	FARA Exemption Code Exploited / Registration Status
		advocacy organizations (such as Christians United for Israel, Israel Allies Foundation, and ISGAP) from triggering DOJ FARA enforcement.	undisclosed engagement to preserve public relations secrecy.	and Commercial/Private Exemption (22 U.S.C. § 613(d)) , and recommended routing matching funds through a newly established U.S. intermediary non-profit to sever direct agency links.
Graystone Public Affairs (Chad Schnitger / Show Faith by Works LLC)	Israel's Ministry of Foreign Affairs (routed through Havas Media as intermediary).	Deploying a massive mobile geofencing and digital ad tracking campaign targeting 900 Christian houses of worship to build a tracking database of 3.9 million congregants and deliver targeted pro-Israel theological ad feeds; touring the "October 7th Experience" mobile museum.	Budgeted up to \$4.1 million by the Foreign Ministry ; expected to receive more than \$3.25 million over five months, paid in equal installments routed through Havas Media, with an initial payment of \$326,000 .	Registered under FARA (via Show Faith by Works LLC, September 2024). Prior to registration, the campaign operated under Show Faith by Works LLC using Havas Media as an intermediary to insulate the direct sovereign-to-contractor link.
<i>Brad Parscale</i> (Clock Tower X LLC)	Israel's Ministry of Foreign Affairs (via French PR firm Havas Media as intermediary).	Deploying AI-optimized social media persuasion campaigns targeting Generation Z (TikTok, Instagram, YouTube) to combat antisemitism and "train/influence" generative AI	Disclosed \$1.5 million-per-month retainer . Original contract of \$6 million (August 2025) was expanded to \$9 million in December 2025.	Registered under FARA (Reg. No. 7649). Operating as a sub-registrant under Havas Media to shield direct sovereign command.

Corporate Contractor Entity	Immediate Domestic Client	Documented Lobbying/PR Objective	Disclosed Transaction Inflows	FARA Exemption Code Exploited / Registration Status
		models like ChatGPT to produce pro-Israel content and suppress criticism; shaping narratives on military conflicts.		
Bridge Partners	Israel's Ministry of Foreign Affairs (routed through Havas Germany).	Managing "Project Esther," an influencer network recruiting 18 US-based social media influencers (posting 25-30 times/month on Instagram and TikTok) to amplify state-aligned foreign policy narratives and fight online criticism.	Up to \$900,000 in contracts, including \$60,000 in upfront payments, \$140,000 in development-phase payments, and flat rates of \$7,000 per post for recruited influencers.	<i>Registered under FARA</i> (Bridges Partners LLC, registered in Delaware, June 2025). Exploited Havas Germany intermediary structure to manage contract compliance and analytics off direct government books.

Transnational Influence and Disclosure Recommendations

A systematic evaluation of the financial and operational loops mapped throughout this audit indicates that the current statutory framework governing foreign influence in the United States is highly vulnerable to regulatory arbitrage. To restore public transparency and close these structural gaps, the following compliance reforms are recommended:

- Mandatory UBO Disclosure for Donor-Advised Funds:** Federal tax authorities should eliminate the donor anonymity shield for DAF grants distributed to organizations engaged in domestic policy advocacy or public litigation. Public charity sponsors must be required to report the original identities of private contributors for any grant exceeding a \$50,000 threshold.
- Narrowing the FARA Academic and Scholastic Exemption:** The DOJ FARA Unit should restrict the application of 22 U.S.C. § 613(e). The exemption must be disqualified for any academic institution or policy think tank receiving more than 25% of its operating capital from foreign sovereigns, foreign-aligned joint ventures, or international matching funds, particularly when the organization's executive leadership includes former foreign military or intelligence personnel.
- Statutory Alignment of the LDA and FARA Regimes:** Congress should amend the LDA exemption under 22 U.S.C. § 613(h) to require immediate FARA registration for any

commercial firm representing a domestic non-profit client if that client's advocacy campaigns, strategic definitions, or funding sources are directly synchronized with the policy mandates of a foreign principal.

4. **Enforcement of Third-Party PR Intermediary Audits:** The DOJ should initiate systematic audits of global advertising networks, such as Havas Media, that serve as financial clearinghouses for sub-contracting agreements. Contracts containing "independent alignment" clauses or "goal-aligned" disclaimers must be subjected to a strict operational control test to determine whether actual direction or funding is originating from a foreign sovereign.
5. **Establishment of Algorithmic Moderation Disclosures:** Tech platforms utilizing enterprise-grade content-filtering engines, such as the Google Jigsaw Perspective API, must be statutorily required to publish all custom regular expression arrays and toxicity weighting custom modifications. This public disclosure must include the identity of any third-party threat intelligence or foreign-aligned technology entities providing linguistic retraining corpora to the API.

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