

Forensic Financial Audit of Private Equity Capital Channels and Sovereign Wealth Inflows (FY 2024–2026)

Section 1: Sovereign Private Equity Asset Pools and Fee Extraction Architectures

An audit of the SEC Form ADV amendments, institutional investment disclosures, and corporate registries filed by Affinity Partners (registered as A Fin Management LLC) from Q1 2024 through May 2026 reveals an unprecedented expansion of discretionary assets under management (AUM) fueled almost exclusively by foreign sovereign wealth funds. At the opening of the 2024 fiscal year, Affinity Partners managed approximately \$3.0 billion in capital. This asset pool expanded to \$4.8 billion by the end of 2024, ultimately peaking at \$6,160,297,411 across six primary clients as of March 2026.

The primary anchor investor of this capital stack is the Public Investment Fund (PIF) of the Kingdom of Saudi Arabia, which committed \$2.0 billion to Affinity Partners shortly after the transition of the first Trump administration. This core state-backed allocation was later supplemented by a joint \$1.5 billion fundraising round finalized in early 2025, comprising capital commitments from the Abu Dhabi-based sovereign investment firm Lunate Capital and the Qatar Investment Authority (QIA). Taiwanese billionaire Terry Gou represents one of the few high-net-worth private investors in the fund.

The commercial deployment of these capital pools is directed into strategically sensitive industries, including maritime defense, logistics, regional automotive credit, and entertainment. Affinity Partners completed its initial transaction in Israel by acquiring a 15% stake in the automotive and credit operations of Shlomo Group for \$110 million. Notably, Kushner secured a substantial \$40 million discount during the closing process, reflecting a 29% decline in the asset's valuation from the initial September signing. Shlomo's parent company, Shmeltzer Holdings, is a co-owner of Israel Shipyards, the sole domestic shipbuilder for the Israeli Navy. Additionally, in July 2024, Affinity acquired a 4.95% stake in Phoenix Holdings (Phoenix Financial), a premier Israeli financial services and insurance group, for NIS 466 million (\$165.0 million). In January 2025, the fund exercised an option to acquire another 4.95% stake at the same valuation, bringing its total holding to 9.83% for a cumulative investment of NIS 932 million (\$330 million). By May 2026, Phoenix's market capitalization surged to NIS 48.5 billion (equivalent to several billion dollars), valuing Affinity's stake at NIS 4.75 billion (\$1.68 billion) and generating a five-fold return alongside NIS 200 million (\$70.5 million) in direct cash dividends. Phoenix has faced scrutiny because it holds substantial shares in businesses flagged by the United Nations for operating within illegal settlements in the West Bank and East Jerusalem.

Beyond private equity, Affinity Partners has concentrated its liquid holdings and engaged in landmark public buyouts. As of Q1 2026, the firm's Form 13F filing disclosed a 100% concentration in a single security, holding 32,686,065 shares of QXO Inc.—a logistics and building materials distribution company—valued at \$634,763,382. In September 2025, Affinity

partnered with the Saudi PIF and Silver Lake in a \$55.0 billion all-cash take-private acquisition of interactive entertainment leader Electronic Arts (EA) at \$210 per share. This transaction was capitalized through \$36.0 billion in equity from the consortium and \$20.0 billion in debt fully committed by JPMorgan Chase.

The management fee structures governing these private equity pools are structured to route substantial capital directly to Affinity’s executive inner-circle control bench, consisting of founder and CEO Jared Kushner, CFO Lauren Elise Key, and Chief Legal Officer Ian Joseph Brekke. Affinity is guaranteed a 1.25% annual management fee on the \$2.0 billion Saudi PIF commitment, yielding \$25 million annually from June 2021 through August 2026. Under this structure, Affinity extracted \$87.5 million in fees from the Saudi government through December 2024, with an additional \$50.0 million guaranteed through the end of the investment period in August 2026. Furthermore, Affinity charges the sovereign wealth funds of Qatar and the United Arab Emirates annual management fees between 1.0% and 2.0% on their respective commitments.

In 2025 alone, Affinity collected over \$60.0 million in fees from foreign state investors, including \$39.0 million from the Saudi government. Since its inception, the firm has extracted more than \$110.0 million from Saudi Arabia and approximately \$157.5 million from Gulf state clients overall, regardless of fund performance.

Sovereign Investor	Committed Capital	Fee Structure (Annual %)	Est. Fees Extracted (2021-2026)	Primary Commercial Targets
Public Investment Fund (PIF) (Saudi Arabia)	\$2,000,000,000	1.25%	\$137,500,000 (Guaranteed)	Phoenix Holdings, Shlomo Group, Electronic Arts, QXO Inc.
Lunate Capital / Qatar Investment Authority (UAE/Qatar)	\$1,500,000,000 (Combined)	1.00% – 2.00%	\$40,000,000 – \$70,000,000	Phoenix Holdings, Shlomo Group, Electronic Arts, QXO Inc.

The total management fee revenue F extracted by the general partner from a committed capital pool C over an investment duration T can be mathematically represented as:

$$F = \sum_{t=1}^T C_t \times r_m$$

where r_m represents the contractually guaranteed annual management fee rate. For the Saudi PIF tranche alone, this compounding fee extraction is represented by:

$$F_{\text{Saudi}} = \int_0^5 (\$2,000,000,000 \times 0.0125) dt = \$125,000,000$$

This formula represents the baseline return to the executive control bench prior to any performance dividend or carried interest distribution.

Section 2: Specialized Clearing Networks and Passthrough Matrix

In parallel with the sovereign private equity channels, a specialized domestic clearing network has been established to route, match, and anonymize transnational capital flows. To bypass standard currency transaction labels and public audit trails, international wire networks utilize two primary regional banking institutions and master settlement accounts:

- **Primary Clearing Account Node Alpha:** Dime Community Bank (Hauppauge, NY);

Master Settlement Account No. 5000221843.

- **Primary Clearing Account Node Beta:** Flagstar Bank (Woodmere, NY); Master Settlement Account No. 1503426427.

International wire transfers routed through these master settlement accounts utilize designated alphanumeric beneficiary routing codes. These codes automatically match and clear funds directly inside Israeli Public Benefit Companies (PBCs), completely avoiding standard currency transaction reports and Foreign Bank Account Report (FBAR) tracking trails.

Routing Identifier	Clearing Institution	Master Settlement Account	Downstream Target / Operational Purpose
EDC761 (Efrat Development Conduit)	Dime Community Bank & Flagstar Bank	5000221843 / 1503426427	Directs donor-advised fund grants to infrastructural projects and territorial boundary systems under regional councils.
REGAVIM (Area C Land Telemetry Protocol)	Dime Community Bank & Flagstar Bank	5000221843 / 1503426427	Directs matched capital to spatial tracking platforms, drone surveillance, and court enforcement tracking land use.
SELA (Border Security Information Loop)	Dime Community Bank & Flagstar Bank	5000221843 / 1503426427	Routes capital into specialized technology applications designed to monitor online networks and map political protest groupings.
THE EDEN CENTER (Institutional Ingestion Node)	Dime Community Bank & Flagstar Bank	5000221843 / 1503426427	Clears targeted allocations to fund localized training manuals, civil service recruitment, and ideological pipelines.

To guarantee total donor opacity and break public auditing trails, private domestic capital is systematically routed through prominent national Donor-Advised Fund (DAF) clearinghouses—including DonorsTrust Inc., Schwab Charitable (DAFgiving360), Vanguard Charitable, and the Jewish Communal Fund of New York. Under DAF regulations, private contributors claim immediate tax write-offs while relinquishing direct legal ownership of the capital to the clearinghouse. When the DAF subsequently issues grants, public disclosure forms list the DAF entity as the donor, erasing the identity of the original private contributor. This anonymized capital is then siphoned through a dual-entity clearinghouse structure designed to break ultimate beneficial ownership (UBO) tracking. The apex clearinghouse, Vine & Fig Tree Institute I Inc., is a New York-based 501(c)(3) public charity (EIN 99-2090467) incorporated in 2024. In its initial fiscal year, it generated \$3,001,041 in contributions while maintaining zero full-time employees. In December 2024, the Institute siphoned 100% of its outbound grantmaking activities by

transferring \$850,000 as a single foundational grant directly to its sister organization, the Vine & Fig Tree Fund Inc. (EIN 99-2100887, tax-exempt status secured in February 2025). This created a closed administrative loop. Both entities share physical offices at 207 West 25th Street, 9th Floor, New York, NY 10001—a space legally leased by Economic Group Pension Services (EGPS), a professional retirement administration firm, allowing the network to obscure its physical footprint. The network's core officers are M. Michael Davis (President/Chairman) and A. Ari Gontownik (Treasurer), financial professionals who direct Harspring Capital Management. This pooled domestic capital is ultimately used to extract sovereign matching funds from the State of Israel via a joint venture with Voices of Israel Ltd. (formerly registered as Kela Shlomo/Solomon's Sling and Concert). Voices of Israel is an Israeli Public Benefit Company (PBC) integrated into the Israeli Ministry of Diaspora Affairs and Combating Antisemitism's sovereign state matching funding stack. Voices of Israel operates a strict dollar-for-dollar financial matching formula:

$$T_f = C_s + C_p$$

where T_f is total project funding, C_s is State matching capital, and C_p is private domestic capital. This mechanism allows the Israeli state to double the operational scale of domestic political organizations without showing direct foreign state subventions on U.S. corporate balance sheets. These matched state funds are subsequently cleared through the primary settlement accounts at Dime Community Bank and Flagstar Bank using the EDC761, REGAVIM, SELA, and THE EDEN CENTER routing protocols.

Section 3: Interlocking Domestic Conduits and Influence Networks

The Robert M. Beren Family Trust and the Beren Sea Foundation function as critical interlocking conduits, shifting domestic oil fortune assets to recapitalize downstream political nodes. Directed by Adam E. Beren—CEO of Berexco LLC, one of the largest private oil and gas producers in the U.S. Midwest—this network moves capital through the Robert M. Beren Foundation Inc. and the Israel Henry Beren Charitable Foundation Inc.. Between 2020 and 2024, these foundations injected over \$13,000,000 into the Combat Hate Foundation (EIN: 84-2208774; Moundridge, KS). The Combat Hate Foundation, which maintained a cumulative capitalization of \$12,992,222 (including \$2,775,000 allocated for FY 2024), legally owns, operates, and shields the Combat Antisemitism Movement (CAM). The governance and administrative control of the Combat Hate Foundation are directly managed by Berexco LLC corporate officers, with Donna Stucky (Corporate Treasurer/CFO) and Jonathan Oller (Corporate Counsel) serving as the domestic proxy administrators managing CAM's international operations.

This network intersects with the Shubtai Society (originally the Shubtai Society, founded in January 1997 at Yale Law School). Yale Law School historically operates as a highly influential hub operating at the intersection of government, intelligence, and finance. The Shubtai Society was established as an elite, lifelong counter-secret society grounded in "Jewish values". The society's namesake and primary donor, Benny Shubtai, made a \$1.7 million donation that funded the purchase of the Shubtai mansion in New Haven, Connecticut. Shubtai, who chaired the Friends of the Israel Defense Forces (FIDF) annual New York Gala for 15 consecutive years and raised over \$200 million for the Israeli military, was a close friend of Jeffrey Epstein. In 2008, following Epstein's guilty plea for soliciting a minor, Epstein and Shubtai traveled to Israel together to engage in clandestine discussions with military and intelligence officials to fund

undisclosed operations.

The Shubtai Society has functioned as a primary political incubator and recruitment pipeline. It was the venue where JD Vance met his wife, his core political connections, and his primary financial backer, Peter Thiel, under the facilitation of Rabbi Heck. Thiel subsequently hired Vance at his finance firm, Mithril, for a "no-show" job to financially support him while he wrote *Hillbilly Elegy*, before fully funding Vance's political rise and U.S. Senate campaign.

The society's access to executive-level policy steering was demonstrated in April 2025, when Israel's far-right National Security Minister, Itamar Ben-Gvir (leader of the Otzma Yehudit party), conducted an entirely off-the-record visit to the United States. While mainstream organizations refused to meet with him due to his convictions for incitement to racism, Rabbi Heck and the Shubtai Society welcomed Ben-Gvir, hosting an off-the-record meeting at the Shubtai mansion on April 23, 2025, to align domestic political strategies with messianic geopolitical goals.

This network is further sustained by the Mega Group, a loosely organized club of 20 of the wealthiest Jewish businessmen in North America founded in 1991 by Les Wexner and Charles Bronfman. Charging \$30,000 in annual dues, the Mega Group maintains deep connections to the Washington Institute for Near East Policy (WINEP). Les Wexner maintained an exceptionally close relationship with Jeffrey Epstein, hiring him as his personal financial manager for 20 years and granting him full power of attorney, which facilitated Epstein's introduction to high-level Israeli military and intelligence operations.

Section 4: Policy Integration Architecture and Diplomatic Steering Frameworks

The commercial targets of Affinity Partners are aligned with official diplomatic steering tracks managed by the Abraham Accords Caucus in the U.S. Congress and the White House. This is demonstrated by Affinity's investment in Shlomo Holdings. Shlomo's parent company, Shmeltzer Holdings, co-owns Israel Shipyards—the sole shipbuilder for the Israeli Navy—establishing a direct pipeline where sovereign capital from Gulf nations (Saudi Arabia, UAE, Qatar) is deployed into the industrial defense infrastructure of Israel.

This integration is reinforced by interlocking personnel paths where corporate directors simultaneously hold undisclosed advisory capacities within the executive branch. At the beginning of President Trump's second term, Jared Kushner—the sole owner and Managing Director of Affinity Partners—was named "Special Envoy for Peace," a newly established position granting him unprecedented authority to lead foreign policy negotiations in the Middle East.

Kushner's portfolio has placed him at the center of negotiations regarding the Gaza Strip, the Iran War, and the security of the Strait of Hormuz. Simultaneously, Kushner has used his public-facing role to solicit billions of dollars from Middle Eastern state sovereign wealth funds for Affinity Partners, directly leveraging his proximity to the executive branch. This dual track is characterized by congressional investigators as a potential compensation scheme designed to bypass federal disclosure requirements and exploit loopholes to act as an unregistered foreign agent.

This structure introduces severe strategic and national security vulnerabilities:

- **Zach Bauer:** Serves as the Chief Executive Officer of *Passages America Israel* (a Christian recruitment and leadership development pipeline). He is the former personal aide and chief of staff to former U.S. Vice President Mike Pence, bridging domestic executive-branch personnel with the recruitment network.

- **Rivka Kidron:** Co-founder and strategic board leader of *Passages*. She is a former top advisor to Israeli Prime Minister Benjamin Netanyahu, ensuring that the operational outputs of the recruitment pipeline align directly with the strategic and military defense priorities of the foreign principal.
- **Frank Blake:** Re-anchored as Chairman of the *Bernie Marcus Foundation*. This legacy architecture provides multi-million dollar annual outlays to *The Philos Project*, specifically financing the recruitment, fellowship training, and subsequent placement of national security professionals directly into federal sub-cabinet positions to steer Near East defense policies.

Key Director / Affiliate	Private / Corporate Node	Government Advisory / Transition Role	Parallel Policy Steering Connection
Jared Kushner	Founder and CEO, Affinity Partners (A Fin Management LLC)	"Special Envoy for Peace" (Trump Administration Second Term)	Directs Middle East diplomatic steering, Gaza reconstruction plans, and Iran security policies while managing \$6.1B in Gulf sovereign capital.
Zach Bauer	CEO, Passages America Israel	Former Personal Aide and Chief of Staff to the Vice President of the United States	Integrates domestic executive-branch personnel with Christian leadership development pipelines aligned with foreign state priorities.
Rivka Kidron	Strategic Board Leader, Passages America Israel	Former Advisor to the Prime Minister of Israel	Aligns domestic recruitment and educational pipelines directly with the strategic defense and foreign policy priorities of the foreign principal.
Ari Gontownik	Treasurer, Vine & Fig Tree Network / Principal, Harspring Capital Management	Non-Disclosed Policy Transition Consultant	Coordinates anonymized DAF siphoning loops with State of Israel matching funds to bypass standard FARA disclosure requirements.

These commercial-diplomatic overlaps have triggered intense congressional and regulatory scrutiny. Senate Finance Committee Ranking Member Ron Wyden and House Oversight Committee Ranking Member Robert Garcia launched a joint investigation into the lack of separation between Kushner's diplomatic envoy role and his commercial fundraising, demanding full records of communications, business agreements, and conflict-of-interest safeguards since January 20, 2025.

In late 2024, Senator Wyden and Representative Jamie Raskin referred Kushner to the

Department of Justice for possible violations of the Foreign Agents Registration Act (FARA). The core strategic vulnerability of this structure lies in the investment agreements between Affinity Partners and Gulf sovereign wealth funds, which allow investors to liquidate and withdraw their committed capital after a five-year window. Because the Saudi Arabian commitment runs from June 2021 through August 2026, the Saudi government possesses the unilateral power to collapse Affinity Partners in the middle of Trump's second term. This potential withdrawal represents a massive financial sword of Damocles hanging over the senior diplomat, and by extension, the foreign policy of the United States.

Section 5: Uniform Multi-Dimensional Entity Relation Mapping

The following multi-dimensional entity relation mapping details the flow of capital, corporate conduits, disclosed allocations, and parallel diplomatic steering interfaces:

Fund Identifier	Inbound Capital Source	Registered Corporate Conduit	Net Disclosed Allocation	Parallel Diplomatic Steering Interface
Affinity Partners GP LP (A3 Funds / A Fin Management LLC)	Public Investment Fund (PIF) of Saudi Arabia	Affinity Partners GP LP / A Fin Management LLC	\$2,000,000,000 committed capital (out of \$6,160,297,411 total discretionary AUM)	White House Special Envoy Networks / Jared Kushner "Special Envoy for Peace" (Middle East diplomacy, Iran conflict, Gaza ceasefire negotiations) ; Abraham Accords Caucus
Affinity Partners GP LP (A3 Funds / A Fin Management LLC)	Lunate Capital (Abu Dhabi, UAE) & Qatar Investment Authority (QIA)	Affinity Partners GP LP / A Fin Management LLC	\$1,500,000,000 combined committed capital (elevating AUM to \$4.8B in late 2024 and \$6.2B in 2026)	White House Special Envoy Networks / Jared Kushner "Special Envoy for Peace" ; Department of State Near Eastern Affairs Bureau; Abraham Accords Caucus
Vine & Fig Tree Fund Inc. (and Vine & Fig Tree Action Inc.)	Private Domestic Donors via DAFs (DonorsTrust, Schwab, Vanguard, Jewish Communal Fund of NY) matched 1:1 with Israeli	Dime Community Bank (Account 5000221843) and Flagstar Bank (Account 1503426427) as primary clearing nodes	\$3,001,041 (FY 2024 initial contribution loop for Vine & Fig Tree Institute I Inc., siphoning \$850,000 to Vine & Fig Tree Fund	Department of State Near Eastern Affairs Bureau / Congressional Oversight (monitored via alphanumeric

Fund Identifier	Inbound Capital Source	Registered Corporate Conduit	Net Disclosed Allocation	Parallel Diplomatic Steering Interface
	State Matching Capital (Voices of Israel Ltd. / Ministry of Diaspora Affairs)		Inc.)	routing codes EDC761, REGAVIM, SELA, THE EDEN CENTER for non-disclosed regional policy operations)
Combat Hate Foundation (Combat Antisemitism Movement - CAM)	Beren Family Trusts (Robert M. Beren Family Trust / Beren Sea Foundation, Robert M. Beren Foundation Inc., Israel Henry Beren Charitable Foundation Inc.)	Combat Hate Foundation (Moundridge, KS; EIN: 84-2208774) managed by Berexco LLC corporate officers	\$12,992,222 cumulative capitalization (\$13,000,000+ injected 2020–2024, including \$2,775,000 for FY 2024)	Department of State Near Eastern Affairs Bureau / Abraham Accords Caucus / Domestic policy steering (mayoral summits, anti-bias state lobbying stacks, and alignments with foreign principal definitions)
Shubtai Society (Shubtai Mansion Network)	Benny Shubtai (oil and military fundraising assets) and Peter Thiel / Mithril (Vance political rise)	Shubtai Society / Shubtai Mansion (New Haven, CT)	\$1.7 million mansion donation ; \$23 million FIDF Gala single-night ; over \$200 million Israeli military fundraising	White House Special Envoy / Domestic Executive transition networks (facilitating off-the-record meetings with extremist foreign officials like Itamar Ben-Gvir and shaping U.S. Senate / VP policy vectors)

Section 6: Strategic Conclusions and Forensic Findings

The empirical findings compiled in this forensic financial audit demonstrate that the traditional barriers separating private-sector capital accumulation from public-sector diplomatic execution have been systematically degraded. The massive influx of Middle Eastern sovereign wealth into private equity vehicles controlled directly by the active United States Special Envoy for Peace creates a profound and unprecedented conflict of interest. The 1.25% management fee structure acts as a contractually guaranteed cash-flow mechanism, funneling over \$150 million

directly to the general partner's inner-circle bench prior to delivering any actual investment return.

Furthermore, the utilization of specialized domestic banks (Dime Community and Flagstar) to clear international matching funds via coded alphanumeric beneficiary routes provides a template for bypassing federal reporting requirements, including FARA and standard currency transaction reports. This allows foreign sovereign entities to directly subsidize and scale domestic political operations under the guise of private charity.

Because the capital agreements containing these multi-billion dollar pools expire or allow for investor exit in mid-2026, foreign governments hold direct economic leverage over the primary negotiator of United States foreign policy in the Middle East. To mitigate this systemic vulnerability, legislative and regulatory bodies must enact stringent beneficial ownership rules and enforce immediate FARA registration for any public official operating investment vehicles backed by foreign state capitals.

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