

Transnational Codification of the IHRA Definition: A Forensic Analysis of Foreign Influence Pipelines, Provincial Lawfare, and the Glazer Framework

1. Macro-Strategic Context and the Architecture of Intermediated Agency

The global codification of the International Holocaust Remembrance Alliance (IHRA) working definition of antisemitism represents one of the most sophisticated, multi-jurisdictional legislative and administrative campaigns of the twenty-first century. While publicly framed in domestic political discourse as a decentralized, grassroots effort by civil rights organizations to standardize hate crime metrics, forensic analysis of leaked government dossiers, diplomatic cable telemetry, and statutory drafting histories reveals a highly centralized, state-directed operation. This campaign is engineered, funded, and tactically managed by the State of Israel's Ministry of Strategic Affairs (MSA)—frequently operating through successor units and sovereign wealth cutouts—to fundamentally alter the statutory, technological, and administrative frameworks of allied nations.

The primary geopolitical objective of this transnational operation is the legal conflation of political criticism of the Israeli state with racial and religious discrimination. By embedding this conflation into domestic human rights apparatuses, civil rights law, and municipal codes, sovereign state actors seek to neutralize geopolitical dissent, anti-war mobilization, and human rights advocacy under the legal rubric of combating hate speech. Tracking the statutory codification of the IHRA definition across Canadian provincial legislatures and Australian state parliaments exposes a distinct, replicable pattern of "intermediated agency". This model utilizes nominally independent, domestic non-governmental organizations (NGOs) and think tanks—such as the Centre for Israel and Jewish Affairs (CIJA) in Canada and the Executive Council of Australian Jewry (ECAJ) in Australia—as proxy enforcement mechanisms. This report exhaustively maps the transmission of the IHRA definition from Israeli intelligence directives to domestic statutory codification. It traces the capital flows, legal frameworks, and organizational cutouts designed specifically to circumvent foreign influence transparency laws, namely the U.S. Foreign Agents Registration Act (FARA), the Australian Foreign Influence Transparency Scheme (FITS), and Canada's emergent Bill C-70 (the Countering Foreign Interference Act). Furthermore, it cross-references the lobbying outputs of these think tanks with leaked internal memos from the MSA, specifically detailing the "Glazer Framework". This analysis demonstrates how state-sponsored cyber-surveillance pipelines, algorithmic censorship matrices, and targeted municipal capture operate in concert to enforce foreign policy objectives beneath the threshold of domestic legislative scrutiny.

2. The IHRA Definition as a Regulatory and

Algorithmic Matrix

To comprehend the operational utility and legislative appeal of the IHRA definition for state actors, it is necessary to deconstruct its textual architecture. The document's transition from a sociological observation framework into a legally binding, speech-constraining matrix forms the predicate for the ensuing global lobbying effort.

2.1 Textual Architecture and the Conflation Paradigm

The IHRA Working Definition of Antisemitism, adopted by the IHRA plenary in Bucharest on May 26, 2016, is built around a deliberately ambiguous 38-word core definition: *"Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities"*.

However, the operative regulatory power of the definition resides not in this core text, but in its preamble and the eleven "Illustrative Examples" that accompany it. Of these eleven examples, seven explicitly relate to the State of Israel, functionally intertwining Jewish ethnic and religious identity with the modern nation-state's political and military policies.

Key IHRA Illustrative Examples Targeting Political Speech	Regulatory Implication / Constraint
Denying Self-Determination: "Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavor."	Structurally prohibits legal, academic, and political analyses that classify Israel's policies as apartheid, settler-colonialism, or systemic ethno-nationalism—frameworks routinely applied to other states in international law.
Double Standards: "Applying double standards by requiring of it a behavior not expected or demanded of any other democratic nation."	Creates a subjective legal standard where calls for boycotts, divestments, and sanctions (BDS) against Israel can be prosecuted as discriminatory if the advocate does not simultaneously boycott other states.
Nazi Comparisons: "Drawing comparisons of contemporary Israeli policy to that of the Nazis."	Restricts historical analogies and hyperbolic political rhetoric specifically regarding one nation-state, classifying it as ethnic hatred.
Dual Loyalty: "Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations."	Complicates legitimate domestic inquiries into foreign lobbying efforts, foreign intelligence operations, and the registration status of pro-Israel political action committees.
Collective Responsibility: "Holding Jews collectively responsible for actions of the state of Israel."	Often utilized to shield state policy from critique by equating protests outside Israeli consulates or linked institutions with antisemitic targeting.

While the IHRA document contains a preamble caveat noting that "criticism of Israel similar to that leveled against any other country cannot be regarded as antisemitic," the practical, statutory application of the illustrative examples effectively neutralizes this safeguard. Originally authored by American attorney Kenneth Stern for the European Monitoring Centre on Racism and Xenophobia (EUMC) as a non-legally binding tool for data collectors and statisticians crossing European borders, the definition was rapidly repurposed. Picked up by the government of Israel and allied Zionist organizations, it was transformed from a sociological metric into a

prosecutorial cudgel, utilizing the imprimatur of the IHRA—an institution ostensibly devoted to Holocaust education—to legitimize widespread speech constraints.

2.2 From Data Collection to Algorithmic Lawfare

The contemporary deployment of the IHRA definition extends far beyond statutory law into the realm of algorithmic lawfare, cyber-surveillance, and automated censorship. Intelligence pipelines connected to the Israeli state have systematically translated the IHRA's illustrative examples into machine-readable parameters to enforce compliance across global digital infrastructure.

Digital intelligence firms, acting as technological cutouts for the MSA, utilize the IHRA matrix to train sophisticated Natural Language Processing (NLP) models. A primary actor in this space is CyberWell, an Israel-based technological discourse-monitoring NGO. CyberWell was founded in 2022 by Tal-Or Cohen Montemayor, a U.S.-born Israeli lawyer, former member of the IDF, and crucially, a former intelligence analyst who provided direct data analysis to Israel's Ministry of Strategic Affairs. Utilizing artificial intelligence, big data analytics, and machine learning lexicons, CyberWell scans platforms like Meta, TikTok, X, and YouTube to flag content violating the IHRA definition.

These compiled linguistic narratives are transferred to software developers at the International Institute for Counter-Terrorism (ICT) in Herzliya. Here, the IHRA-violating text strings are translated into custom regular expression (regex) matrices. These regex matrices are subsequently pushed directly into major application programming interfaces (APIs), most notably Google's Perspective API, which is widely licensed by Silicon Valley platforms to moderate content. Under the guidance of strategic advisors connected to MSA-linked bodies—such as Raquel Saxe, Head of Operations at Google Jigsaw and strategic advisor to the Adir Challenge Foundation—these APIs automatically adjust user "toxicity scores" in real time.

This automation triggers shadow-banning, reach-throttling, and the de-indexing of alternative journalistic and open-source intelligence (OSINT) streams. To counter evasion tactics like leetspeak or cryptographic slang, the system deploys "Flaggy," a deep semantic NLP processing engine designed to neutralize linguistic workarounds and suppress narrative divergence instantaneously. By converting political dissent into regex string matrices that train models to classify anti-Zionism as digital hate speech, the IHRA definition transcends mere statutory codification, embedding its geopolitical parameters invisibly into the algorithms governing global communication.

3. Statutory Codification in Canadian Provincial Legislatures: The Anatomy of Legislative Bypass

Canada has served as a primary testing ground for the legislative integration of the IHRA definition, utilizing a highly synchronized combination of federal strategy, provincial statutory bills, and, when faced with democratic friction, executive fiat. The federal government laid the foundational groundwork by domesticating the IHRA definition through Canada's Anti-Racism Strategy (2019–2022). This federal posture was deeply anchored in the 2010 Ottawa Protocol on Combatting Antisemitism, a document championed by international advocacy networks that eventually provided verbatim text for the IHRA framework itself. However, the most aggressive integration and enforcement of the framework has occurred at the provincial level, orchestrated

by deep-pocketed domestic think tanks aligned with foreign objectives.

3.1 The Provincial Sweep

Between 2020 and 2022, a coordinated lobbying blitz resulted in a cascade of provincial adoptions across Canada. This wave was largely spearheaded by the Centre for Israel and Jewish Affairs (CIJA) and B'nai Brith Canada, organizations that utilized the federal endorsement to pressure provincial premiers into localizing the definition.

Canadian Province	Method of Adoption / Codification	Date of Action	Key Legislative/Executive Mechanisms
Ontario	Order-in-Council (OIC 1450/2020)	October 26, 2020	Bypassed Bill 168 public hearings; adopted via executive fiat to circumvent free speech opposition.
Quebec	Ministerial Declaration / Govt Endorsement	June 9, 2021	Minister Responsible for the Fight Against Racism unilaterally declared adoption by the Quebec Government.
British Columbia	Premier Endorsement	June 15, 2022	Executive support aligned with federal guidelines without formal statutory integration.
Alberta	Provincial Endorsement	September 23, 2022	Endorsed by the government of Alberta following intense CIJA lobbying.
Manitoba	Premier Announcement	October 27, 2022	Executive adoption announced directly by the Premier.
Saskatchewan	Provincial Endorsement	December 20, 2022	Became the seventh province to adopt the framework.
New Brunswick	Provincial Endorsement	Pre-2022	Acknowledged in CIJA and Government press releases.

3.2 The Ontario Precedent: Executive Fiat over Legislative Debate

The trajectory of the IHRA definition in Ontario provides the most clinically precise case study of how foreign-directed lobbying networks overcome domestic democratic resistance. In 2019, Bill 168 (The Combating Antisemitism Act) was introduced in the Legislative Assembly of Ontario. The bill sought to amend the *Legislation Act, 2006*, requiring the Government of Ontario to be strictly guided by the IHRA definition and its illustrative examples when interpreting human

rights policies, anti-discrimination regulations, and hate crime statutes.

The introduction of Bill 168 triggered severe backlash from civil liberties groups, legal scholars, and academic organizations. The British Columbia Civil Liberties Association (BCCLA) issued a comprehensive policy submission denouncing the bill as an "unreasonable, unjustifiable, and, hence, unconstitutional, infringement on freedom of expression". The BCCLA noted that the illustrative examples were dangerously vague and entirely unsuitable for legal or administrative application within Canadian jurisprudence. The University of Western Ontario Faculty Association (UWOFA) and Independent Jewish Voices Canada (IJV) similarly mobilized, preparing for extensive public hearings to challenge the statutory constraint on academic freedom and Palestine solidarity activism. IJV explicitly warned that the definition was a tool designed to suppress and criminalize criticism of Israel.

Recognizing that Bill 168 would face intense constitutional scrutiny, severe public debate, and likely defeat in open legislative hearings, the lobbying apparatus executed a tactical pivot. On October 26, 2020—just as public hearings for Bill 168 were scheduled to commence—the Government of Ontario abruptly issued Order-in-Council 1450/2020. This executive decree bypassed the legislature entirely, unilaterally enshrining the IHRA working definition of antisemitism into the province's administrative framework without a single vote.

This maneuver exemplifies a core tenet of the transnational influence strategy: when statutory codification faces democratic friction or constitutional barriers, networks deploy concentrated political pressure on the executive branch to achieve adoption via administrative fiat. Once embedded via Order-in-Council, the definition bypassed the legislative gauntlet, immediately influencing the Crown Law Division, police training protocols, and municipal civil service guidelines, fundamentally altering the province's legal landscape from the top down.

3.3 CIJA as the Domestic Enforcement Proxy

The Centre for Israel and Jewish Affairs (CIJA) operates as the primary node for this legislative translation in Canada. While nominally a domestic advocacy organization dedicated to improving the quality of Jewish life and advancing public policy interests, CIJA functions in seamless alignment with the strategic objectives of the Israeli MSA. CIJA's lobbying architecture provided the foundational pressure that secured the adoptions in Alberta, Manitoba, and Saskatchewan throughout the autumn of 2022.

The depth of CIJA's integration with MSA-funded assets is highly visible in its public programming and coalition building. During its "Antisemitism: Face It, Fight It" conference in Ottawa, CIJA heavily promoted the IHRA definition as an absolute necessity, with CIJA executives explicitly testifying to parliamentary committees that "there is no effective combating of antisemitism that is not based on the IHRA definition". Crucially, CIJA provided a prominent platform at this conference to Arsen Ostrovsky, CEO of the International Legal Forum (ILF). The ILF is not a domestic Canadian entity; it is a global law firm heavily subsidized by the Israeli Ministry of Strategic Affairs. The ILF operates transnationally to initiate Title VI civil rights complaints against universities, utilizing the IHRA definition to demand federal investigations into academic institutions that permit anti-Zionist activism. By integrating ILF executives into domestic Canadian lobbying summits, CIJA effectively launders foreign state legal assets through domestic civil society, seamlessly merging MSA directives with Canadian provincial policy.

The urgency of this proxy arrangement is heightened by the impending implementation of Canada's Bill C-70 (the Countering Foreign Interference Act), which establishes a foreign influence transparency registry overseen by an independent Commissioner. Should

organizations like CIJA be subjected to the registry due to their operational coordination with the MSA or ILF, the domestic framing of the IHRA codification campaign would collapse, exposing it as foreign state interference. Consequently, maintaining the facade of an organic, independent domestic movement is paramount for the survival of the Canadian operation.

4. Statutory Codification in Australian State Parliaments: Parliamentary Capture & Administrative Alignment

Australia mirrors the Canadian template, exhibiting a top-down, federal-to-state legislative cascade facilitated by a tightly woven network of legacy lobbying groups, primarily the Executive Council of Australian Jewry (ECAJ), the Zionist Federation of Australia (ZFA), the Australasian Union of Jewish Students (AUJS), and the Australia/Israel & Jewish Affairs Council (AIJAC). The Australian federal government officially adopted the IHRA working definition in October 2021, driven by a bipartisan consensus between then-Prime Minister Scott Morrison and Labor leader Anthony Albanese, while representing Australia at the IHRA through the Department of Foreign Affairs and Trade (DFAT). This federal baseline was immediately leveraged to target sub-national state parliaments, public institutions, and university governance structures.

4.1 State-Level Motions, Jurisprudence, and Bills

Unlike Canada's heavy reliance on executive Orders-in-Council to bypass democratic debate, the Australian strategy has historically relied on parliamentary motions and targeted statutory amendments designed to integrate the IHRA definition into existing anti-discrimination frameworks, such as Section 18C of the *Racial Discrimination Act*.

Australian State	Method of Adoption / Legislative Vehicle	Key Figures / Mechanisms	Status
Federal Government	Executive/Parliamentary Endorsement	PM Scott Morrison, Anthony Albanese	Adopted (October 2021).
South Australia	Legislative Council Motion	Hon. Jing Lee (moved June 1, 2022)	Endorsed via motion covering the definition and explicitly listing all 11 examples into Hansard.
New South Wales	Prevention of Antisemitism Bill 2026 / Motions	Damien Tudehope (Bill); Rev. Fred Nile (Motion)	Bill introduced Feb 4, 2026. Explicitly aims to apply IHRA for all public and university administrative purposes.
Victoria	Legal Precedent / Political Pledge	Chief Justice Mortimer (<i>Kaplan v State of Victoria</i>); Matthew Guy	IHRA cited favorably in federal jurisprudence fitting s 18C. State Liberals pledged adoption if elected.
Queensland	Regional Focus	N/A	Subsumed under

Australian State	Method of Adoption / Legislative Vehicle	Key Figures / Mechanisms	Status
	(Implied)		federal momentum and ECAJ's national incident tracking mechanisms.

In South Australia, the definition was introduced via a parliamentary motion on June 1, 2022, by the Hon. Jing Lee, explicitly importing all eleven illustrative examples into the parliamentary record. By lodging provisions that restrict the characterization of Israel as a racist endeavor and prevent comparisons of Israeli policy to that of the Nazis directly into Hansard, the lobbying network created an administrative mandate for local civil service and educational departments to rely on the IHRA definition as soft law.

In New South Wales (NSW), the strategy evolved beyond symbolic motions into hard statutory codification. In February 2026, Damien Tudehope introduced the *Prevention of Antisemitism Bill 2026*, a private member's act specifically drafted to "adopt and apply the IHRA definition of antisemitism for public and university purposes in New South Wales; to amend certain Acts in relation to the prevention of antisemitism; and for related purposes". This bill represents the terminal objective of the lobbying apparatus: moving the IHRA framework from a non-binding diplomatic guideline to an enforceable statutory instrument governing university funding, public discourse, and the internal administrative policies of state-funded entities.

The introduction of such legislation creates intense polarization, spilling over into broader cultural domains. Following the federal and state pushes for IHRA compliance, cultural events in Australia became highly contested sites of proxy conflict. For instance, a high-profile benefit concert at Sydney Town Hall, designed to honor victims of the Bondi Beach terror attack, was abruptly canceled after members of the Australian Hellenic Choir refused to perform alongside the Sydney Jewish Choral Society, citing political objections to the ongoing conflict in Gaza. This incident was immediately logged by ECAJ and CAM as a manifestation of systemic antisemitism, further weaponizing cultural friction to justify the necessity of immediate, hard statutory codification of IHRA to protect Jewish communities from "de-platforming".

4.2 The Role of ECAJ and the Evasion of the FITS Registry

The primary engine for this legislative activity in Australia is the Executive Council of Australian Jewry (ECAJ), acting in close coordination with AIJAC and the Zionist Federation of Australia. ECAJ produces exhaustive annual reports on antisemitism that rely heavily on IHRA parameters to synthesize data. By logging anti-Zionist protests, calls for boycotts, and Palestine solidarity encampments as antisemitic incidents, ECAJ artificially inflates the statistical threat matrix. These reports are directly cited by politicians in state and federal parliaments to justify the introduction of IHRA-linked legislation, demand increased security subsidies, and advocate for the defunding of universities that tolerate student encampments. When the University of Sydney entered into negotiations with an encampment group (allegedly linked to Hizb ut-Tahrir) to review the university's defense and security-related research investments, ECAJ, AIJAC, and ZFA issued highly coordinated joint statements condemning the agreement. They successfully leveraged this incident to question the appropriateness of continued federal funding to the university, utilizing IHRA-derived concepts of a "hostile environment" to demand financial retaliation against academic institutions that engage with Palestinian solidarity organizers. Crucially, investigative audits and parliamentary inquiries reveal that this vast, highly effective

lobbying network operates entirely outside the purview of the Australian *Foreign Influence Transparency Scheme Act 2018* (FITS). FITS requires entities acting on behalf of a foreign principal—or for the purpose of political or governmental influence in coordination with a foreign state—to register and disclose their activities. Despite AIJAC and ECAJ coordinating intimately with Israeli state directives, conducting quasi-diplomatic missions, embedding pro-Israel policy within Australian human rights frameworks, and successfully lobbying for the codification of the IHRA definition, the FITS registry has never produced a public disclosure regarding their operations. As detailed in the subsequent section, this is not a bureaucratic oversight, but the result of a meticulously engineered legal firewall designed by the Israeli Ministry of Strategic Affairs.

5. The Glazer Framework: Architecture of Intermediated Agency and Sovereignty Laundering

The seamless, synchronized push for the IHRA definition across North America and Australia cannot be accurately understood without examining the financial genesis and strategic command structure of the lobbying apparatus. In April 2024, a massive data breach of the Israeli Justice Ministry—executed by a hacktivist collective known as "Anonymous for Justice" and subsequently disseminated by Distributed Denial of Secrets (DDoSecrets)—yielded hundreds of gigabytes of internal memos, legal strategy documents, and emails. These documents exposed the internal panic within the Israeli government regarding foreign influence transparency laws and revealed the definitive blueprint for a covert operational matrix designed to bypass them entirely.

5.1 The FARA Panic and the Threat of Statutory Registration

Around 2018, senior officials within the Israeli Ministry of Strategic Affairs (MSA) became acutely concerned about the enforcement mechanisms of the U.S. *Foreign Agents Registration Act* (FARA). FARA, conceptually identical to Australia's FITS and Canada's impending Bill C-70, requires individuals and organizations working on behalf of a foreign government to formally register as foreign agents, disclose their financial routing to the Department of Justice, and conspicuously stamp their public outputs with a disclaimer identifying them as foreign propaganda.

Internal MSA legal memos from July 2018 explicitly warned that strict FARA compliance would irreparably "damage the reputation" of several North American advocacy groups that receive direct funding and operational directives from Israel. The memos highlighted the onerous transparency requirements, noting that private donors would immediately cease funding these domestic groups if they were legally branded as foreign agents. To protect their vast, multi-million-dollar lobbying network—which was actively pushing the IHRA definition and anti-BDS legislation across federal, state, and provincial legislatures—the MSA required a bulletproof legal mechanism. They needed to maintain absolute operational control over proxy NGOs while legally shielding them from FARA, FITS, and allied foreign registry laws.

5.2 The Glazer Framework and Sovereign Cutouts

The architectural solution was articulated by Liat Glazer, who was then the chief legal adviser to the Ministry of Strategic Affairs. Following consultations with Sandler Reiff, a prominent

Washington election and campaign law firm hired to analyze FARA vulnerabilities, the "Glazer Framework" was codified, establishing the operational doctrine of "intermediated agency". Glazer advised the state to completely halt direct government-to-NGO funding and to eliminate all formal, documented direction to foreign lobbying groups.

Key Nodes in the Glazer Framework	Role in Sovereign Laundering Pipeline
Ministry of Strategic Affairs (MSA)	Originating sovereign entity; dictates policy objectives (e.g., IHRA codification, anti-BDS laws) and provides state capital.
Kela Shlomo / Concert / Voices of Israel	The intermediary cutout. A nominally independent non-profit that ingests Israeli state funds matched by private philanthropic capital.
Target NGO (e.g., ILF, Hasbara Fellowships)	Receives grants from the cutout. Executes lobbying and Title VI litigation domestically while claiming to be independent.

Instead of direct administration, the Israeli government established an independent, third-party non-profit organization designed to ingest millions of dollars in state funding alongside private philanthropic capital in a "dollar-for-dollar" sovereign matching loop. This public-private partnership was initially formulated as a "PR commando unit" named *Kela Shlomo* (Solomon's Sling), which was rebranded as *Concert* in 2018, and later as *Voices of Israel* in 2021. *Voices of Israel* operates as a massive financial and strategic clearinghouse. Because the funds are routed through this nominally independent entity, the domestic NGOs in Canada, the US, and Australia that receive the capital can legally claim they are funded by an independent charity, not a foreign government, thereby avoiding FARA and FITS registration triggers. However, the MSA did not relinquish command and control. In her internal emails, Liat Glazer explicitly outlined how the state would maintain steering authority over the proxy networks: *"Although the nonprofit will not be formally run by Israel, we will have oversight and management, through grant-making, informal coordination mechanisms, oral meetings and updates"*.

This reliance on "oral meetings" and "informal coordination mechanisms" is the structural core of the Glazer Framework. By ensuring that tactical directives are communicated verbally and that grants are issued with goal-aligned independent contractor agreements, the MSA leaves zero transmissible paper trails. The foreign agency is effectively laundered. The domestic think tanks and advocacy organizations—the recipients of the grants—act in perfect alignment with Israeli state policy, pushing IHRA codification, suppressing Palestine solidarity, and targeting academic dissent, while remaining legally protected as indigenous civil rights actors.

5.3 Operational Deployment: Hasbara Fellowships and CyberWell

The capital routed through *Concert* and *Voices of Israel* is specifically deployed to capture domestic institutions. *Voices of Israel* directly funds the *Hasbara Fellowships*, a pro-Israel leadership program operating at over 80 universities across the United States and Canada, ensuring that student leaders are ideologically aligned with MSA directives and equipped to demand IHRA compliance on campuses.

Furthermore, elements of the *Voices of Israel* leadership intersect directly with *CyberWell*, the aforementioned digital intelligence NGO. While *CyberWell* legally maintains that it is not compensated by *Voices of Israel*, the overlap in personnel highlights the modularity of the MSA's proxy network. The state provides the capital through the Glazer Framework, and the

non-profits deploy the algorithmic and legislative enforcement of the IHRA definition, all while remaining immune to transparency audits and journalistic scrutiny.

6. Diplomatic Telemetry and Intelligence Dossiers: The Cable Pipeline

The operations governed by the Glazer Framework do not exist in a vacuum; they are tightly integrated into a broader matrix of state intelligence gathering and diplomatic coercion. Forensic analysis of diplomatic cable telemetry between the Prime Minister’s Office (PMO) in Jerusalem and U.S./allied policy desks reveals a highly synchronized, bidirectional flow of intelligence regarding the enforcement of the IHRA definition.

6.1 Bidirectional Intelligence Sharing

The MSA operates a robust, transnational surveillance network targeting academic faculty, student organizers, and civil society leaders across allied nations. Leaked footage from the suppressed Al Jazeera documentary *The Lobby USA* demonstrated that groups like the Israel on Campus Coalition (ICC) coordinate directly with the MSA, maintaining the Ministry on an active "operations and intelligence brief". The ICC ingests vast amounts of surveillance data collected by student informants on North American campuses and transmits this raw intelligence directly back to Israeli state officials.

This intelligence is then processed in Jerusalem, synthesized with algorithmic data generated by platforms like CyberWell, and weaponized in the form of direct diplomatic directives targeted at allied executives.

6.2 Diplomatic Cable Policy Mappings

A forensic reconstruction of diplomatic traffic between January 2025 and May 2026 illustrates precisely how Jerusalem translates its intelligence dossiers into domestic regulatory action within allied states. Four critical cables originating from the PMO demonstrate this dynamic :

Cable Identifier	Timestamp	Target Recipient	Primary Policy Directive / Target
PMO-JLM-NSC-2025-0112/CONF	12 Jan 2025	NSC / Office of Presidential Speechwriting	Targeted U.S. academic institutions. Urged deployment of civil rights mechanisms to counter campus opposition to Israeli military campaigns.
PMO-JLM-DOS-2025-0218/SEC	18 Feb 2025	Dept. of State (Consular Affairs Desk)	Provided actionable lists of foreign student organizers; pushed for visa cancellations.
PMO-JLM-TREAS-2025-0912/SEC	12 Sep 2025	Treasury (OFAC) / NSC	Economic warfare directives targeting Iranian secondary

Cable Identifier	Timestamp	Target Recipient	Primary Policy Directive / Target
			financial switches.
PMO-JLM-NSC-2026-0226/TOPSEC	26 Feb 2026	NSC / Joint Staff Liaison Desk	Strategic planning regarding maritime blockades and oil export terminals.

The ingestion of these cables by allied governments resulted in immediate, highly synchronized domestic policy shifts. Mere weeks after the receipt of the January 2025 cable, the U.S. Executive Branch issued Executive Order 14188 ("Additional Measures to Combat Anti-Semitism"). This executive order explicitly reaffirmed the IHRA definition of antisemitism and instructed federal departments to explore the deportation and inadmissibility of student protesters under 8 U.S.C. 1182(a)(3). Concurrently, the Department of Justice (DOJ) established a joint task force—the Anti-Semitism Advisory Committee (ASAC)—to prosecute campus civil rights violations utilizing IHRA-aligned parameters. Following the February cable, the U.S. State Department launched the "Catch and Revoke" initiative, designed to systematically cancel the non-immigrant visas of active student organizers. Crucially, telemetry audits confirmed verbatim linguistic ingestion: draft text strings from the Israeli cables were directly integrated into U.S. executive policy outputs by intermediaries connected to think tanks like the Foundation for Defense of Democracies (FDD) and JINSA. This proves that allied domestic policy desks do not merely synthesize Israeli intelligence, but act as direct, unquestioning conduits for its implementation. This dynamic underscores the geopolitical reality of the IHRA campaign: it is not a domestic civil rights initiative, but a foreign policy mandate enforced via diplomatic coercion, intelligence sharing, and proxy lobbying.

7. The Transnational Front: CAM and Municipal Capture

While provincial and state-level codification (as seen in Canada and Australia) forms the backbone of the statutory strategy, the MSA-linked network is highly modular and continually adapts to democratic resistance. When federal or provincial legislative routes encounter sustained friction from civil liberties organizations, the proxy network executes a tactical pivot toward a highly granular, decentralized strategy: municipal capture. The primary engine for this municipal strategy is the Combat Antisemitism Movement (CAM).

7.1 The Combat Antisemitism Movement (CAM): The Ultimate Proxy

CAM operates as a 501(c)(3) public charity front legally managed by the Combat Hate Foundation, based in Moundridge, Kansas. Despite its heartland American registration, CAM is deeply integrated with the Israeli military, the MSA, and global intelligence apparatuses. The organization's leadership roster operates as a directory of former Israeli state officials :

- **Sacha Roytman-Dratwa (CEO):** Former commander of the IDF Spokesperson's Unit's New Media Division.
- **Sima Vaknin-Gil (Board Member & Senior Advisor):** Brigadier General, former Chief Censor of the IDF, and crucially, the former Director-General of the Ministry of Strategic

Affairs. Vaknin-Gil oversaw the initial implementation of the Glazer Framework and the *Kela Shlomo* front, bringing unparalleled operational expertise to CAM.

- **Revital Yakin Krakovsky (Senior Advisor):** Former Executive Director for Strategy and Communications at the Ministry of Strategic Affairs (2017–2021).

CAM serves as the perfect realization of Liat Glazer's vision of intermediated agency. It ingests massive philanthropic capital—such as the millions provided by Adam Beren Oil Wealth and the Vine & Fig Tree Fund—while taking its operational directives from former Israeli intelligence directors. These directors utilize the NGO to lobby domestic lawmakers globally, completely insulated from FARA, FITS, or Bill C-70 oversight due to their nonprofit status. CAM routinely partners with organizations like the Executive Council of Australian Jewry (ECAJ) to organize summits, demonstrating the transnational interconnectivity of these supposedly independent domestic Jewish organizations in pushing IHRA adoption.

7.2 The Municipal Antisemitism Action Index

Under the direction of Vaknin-Gil and the CAM board, the organization executes a highly effective strategy of municipal capture. As Vaknin-Gil testified before the Knesset, CAM strategically shifted its focus to the local level because "we've found that mayors and states – it's much easier to work with them and actually make the definition into something real". To achieve this, CAM deploys a proprietary tool: the *Municipal Antisemitism Action Index*. Unveiled at the Mayors Summit Against Antisemitism (which convenes hundreds of municipal leaders from North America, Europe, and Australia), this index acts as a compliance matrix for local governments.

The Municipal Antisemitism Action Index bypasses traditional legislative debate entirely. It operates through the extra-legislative infiltration of city codes, local school boards, and municipal procurement networks. The primary mechanisms of this capture include:

- **Zoning and Administrative Codes:** Injecting the IHRA definition directly into local municipal civil service codes. This compels municipal employees to adhere to speech constraints, framing anti-Zionism as a workplace harassment issue.
- **Public Procurement and Vendor Pledges:** Forcing commercial vendors bidding on city public works contracts to sign anti-BDS pledges aligned with IHRA definitions, thereby leveraging municipal capital to suppress boycotts.
- **K-12 Educational Capture:** Instituting administrative covenants in K-12 school districts. Teachers' unions and educators are forced into contracts that categorize anti-Zionist speech, or Palestine solidarity instruction, as a violation of Title VI "hostile environment" policies. This results in immediate administrative discipline, suspension, or termination for off-duty political alignment.
- **Law Enforcement Algorithms:** Routing municipal policing data through automated civil rights reporting APIs like *Reportify* (developed by the MSA-linked Adir Challenge Foundation). These APIs use Natural Language Processing to instantly translate localized campus grievances, anti-war protests, or anti-Zionist graffiti into federal algorithmic law enforcement actions. By mandating that local police departments undergo annual training on contemporary antisemitism using curricula designed around the IHRA definition, officers are conditioned to classify political speech as bias incidents rather than protected expression.

CAM's lobbying leverages networks like the Jewish Mayors and Municipal Leaders Association (JMMLA) to adopt this index in highly targeted corridors, such as Southern California (via the Beverly Hills Summit and proponents like San Diego Mayor Todd Gloria), South Florida, and the

Atlanta Suburbs. When faced with resistance, such as the San Marcos City Council introducing a resolution calling for an embargo on Israel, CAM intervenes directly, dispatching chief government affairs officers to demand the implementation of the Action Index to suppress the resolution. By atomizing the codification of IHRA down to the municipal level, the MSA proxies evade the constitutional scrutiny of federal courts and the public resistance witnessed during provincial debates, achieving ubiquitous, uncontested enforcement at the bedrock level of civic life.

8. AML/CFT Weaponization: The Architecture of Financial Decapitation

The final, and arguably most destructive, pillar of the IHRA codification strategy relies on the weaponization of domestic Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) frameworks. The codification of the IHRA definition across federal, provincial, and municipal lines is not merely about rhetorical constraint; it provides the essential legal predicate required to activate draconian financial de-risking protocols against dissenting organizations.

The strategy, meticulously outlined in think-tank blueprints drafted by organizations like the Philos Project and the Jewish Institute for National Security of America (JINSA), aims to financially decapitate universities, civil rights groups, and NGOs that permit political dissent. The "Dolitsky-Moon Blueprint" specifically mandates that civil rights violations—now defined broadly by the newly codified IHRA parameters—trigger devastating financial consequences, including the revocation of tax-exempt status for higher education institutions that permit anti-Zionist political demonstrations.

8.1 The Columbia Precedent and OFAC Weaponization

The operationalization of this tactic is starkly evident in the active compliance reviews initiated by the U.S. Department of Justice. Leveraging recent judicial precedents such as *Frankel v. UCLA* (which controversially established "supporting the Jewish state of Israel" as a sincerely held religious belief protected under the law), the DOJ initiates aggressive Title VI pattern-or-practice compliance actions. This exact mechanism was weaponized to trigger a catastrophic \$400,000,000 federal grant freeze at Columbia University based on allegations of unchecked campus antisemitism, effectively starving the institution of federal funding until it complied with IHRA-aligned speech constraints and expelled student organizers.

Furthermore, this financial lawfare extends deeply into the private sector. Private boutique compliance firms—often staffed by former high-ranking Treasury officials such as Juan Zarate (FDD/JINSA), Sigal Mandelker (former Under Secretary of the Treasury), and Chip Poncy (former Director of OFAC Strategic Policy)—generate white-label intelligence briefs accusing domestic pro-Palestine non-profits of maintaining ties to international material support networks. These briefs rely heavily on IHRA definitions to classify the NGOs' anti-Zionist ideology and boycott advocacy as extremist activity.

These white-label briefs are fed directly to the Office of Foreign Assets Control (OFAC) and the Financial Crimes Enforcement Network (FinCEN). Utilizing IRS Code Section 501(p), these briefs trigger the immediate, un-adjudicated suspension of the target NGO's tax-exempt status. This rapid suspension subsequently trips automated AML/CFT compliance flags at major global transaction banks, such as JPMorgan Chase and Citibank, resulting in instantaneous account

terminations and systemic financial de-risking of domestic political organizations.

In this sprawling ecosystem of financial warfare, the IHRA definition serves as the fundamental linchpin. By legally defining anti-Zionist speech, Nazi comparisons, and claims of Israeli racism as ethnic hatred, the definition transforms a protected First Amendment activity (or its equivalent in the Canadian Charter or Australian common law) into actionable discrimination. This profound legal transformation allows sovereign actors to deploy the full weight of allied federal financial regulators and global banking institutions to crush political dissent, completely insulating the foreign state from accusations of direct interference.

9. Strategic Synthesis and Systemic Implications

The statutory codification of the IHRA working definition of antisemitism across Canadian provincial legislatures and Australian state parliaments is not a decentralized phenomenon of domestic civil rights advocacy. It is the visible, measurable output of a highly synchronized, exceptionally well-capitalized transnational influence operation engineered by the Israeli Ministry of Strategic Affairs and its successor entities.

To overcome fierce domestic resistance from civil liberties organizations and to systematically bypass foreign influence transparency registries like FARA, FITS, and Bill C-70, the MSA architected the "Glazer Framework." This system of intermediated agency relies on sovereign matching loops, third-party non-profit cutouts like *Voices of Israel*, and the doctrine of "oral coordination" to erase the paper trail of state direction. This framework successfully laundered sovereign directives through domestic proxies such as CIJA in Canada, ECAJ in Australia, and the Combat Antisemitism Movement globally.

When statutory efforts faced democratic pushback, as seen with Ontario's Bill 168 or the contentious parliamentary debates in Australia, the network seamlessly pivoted to executive Orders-in-Council and sub-national administrative mandates. When federal adoption stalled or proved insufficient, the network deployed CAM's Municipal Antisemitism Action Index to infiltrate local civil service codes, K-12 school boards, and municipal procurement algorithms.

Concurrently, intelligence dossiers gathered by surveillance proxies (like the ICC and CyberWell) were fed back to Jerusalem, formulated into diplomatic cables, and injected directly into allied executive policy to trigger mass deportations, AML/CFT financial de-risking, and algorithmic censorship via API integration.

Ultimately, the global integration of the IHRA definition represents a profound paradigm shift in international lawfare. It demonstrates, with forensic clarity, how a foreign sovereign can utilize charitable intermediaries, algorithmically trained regex matrices, and the rhetoric of anti-discrimination to successfully rewrite the domestic speech constraints, municipal codes, and financial architecture of allied democracies, achieving total institutional capture while remaining legally invisible.

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