

The Architecture of Extraterritorial Lawfare: Israeli Intelligence Command Structures, Proxy Litigation, and the Financial Weaponization of U.S. Domestic Law

Executive Overview

The convergence of sovereign intelligence operations and private civil litigation represents a profound and unprecedented evolution in modern asymmetric statecraft. Over the past two decades, the national security apparatus of the State of Israel has fundamentally redesigned its strategic doctrine for countering geopolitical adversaries and domestic dissent. This paradigm shift necessitated a transition away from strictly kinetic military engagements and covert tactical strikes toward the systemic, administrative disruption of adversarial financial networks. To execute this strategy within the boundaries of international law and foreign sovereignty, the Israeli intelligence community engineered a highly sophisticated, hybrid operational infrastructure. This architecture seamlessly merges the classified intelligence-gathering capabilities of state agencies—principally the Mossad and the Israel Security Agency (Shin Bet)—with the agile, legally unconstrained maneuverability of non-governmental legal proxies operating within the United States and other foreign jurisdictions.

The analysis presented in this comprehensive report forensically reconstructs this public-private command structure, tracing its origins directly to the Mossad's highly classified "Harpoon" division and mapping its subsequent operational evolution into the domestic regulatory frameworks of the United States. By systematically synthesizing leaked diplomatic communications, internal National Security Council (NSC) legal frameworks, structural organizational audits, and federal regulatory filings, this report exposes the specific intelligence handlers who pioneered this strategy. Furthermore, it details the precise administrative mechanisms by which foreign state entities utilize domestic legal organizations—specifically the Shurat HaDin Israel Law Center and the Zachor Legal Institute—to bypass sovereign immunity limitations, evade mandatory foreign agent registration, and directly weaponize the United States Department of the Treasury's Office of Foreign Assets Control (OFAC) against domestic targets.

The central thesis derived from this exhaustive analysis indicates that these ostensibly independent non-governmental organizations (NGOs) function as auxiliary legal and operational arms of the Israeli state. They operate within a legally engineered buffer zone, receiving classified state intelligence and translating it into formalized administrative petitions designed to paralyze the financial infrastructure of domestic civil society groups, anti-war organizations, and Palestinian advocacy networks. This methodology effectively privatizes the execution of state foreign policy, utilizing the compliance algorithms of the international banking system, federal civil rights statutes, and U.S. anti-terrorism regulations as instruments of proxy warfare.

The Genesis of the Harpoon Doctrine and Asymmetric Financial Warfare

The structural and ideological foundation of this proxy lawfare network originates deep within the Israeli intelligence apparatus during the early 2000s, a period marked by a rapid escalation in transnational terrorism and complex financial networks supporting militant operations. Recognizing that conventional counter-terrorism strategies and kinetic military actions were insufficient to dismantle the complex, globally distributed economic engines funding adversarial groups such as Hamas, Hezbollah, and the Popular Front for the Liberation of Palestine (PFLP), former Mossad Director Meir Dagan conceptualized a radical operational pivot. Dagan recognized that the global war on terror had critically overlooked financial warfare as an offensive, proactive strategic doctrine. He understood that systemic violence was continuously fueled by an uninterrupted influx of capital traversing the international banking system, and that kinetic strikes against individual personnel or physical infrastructure were mere tactical victories so long as the underlying financial architecture remained intact.

To address this glaring strategic vulnerability, Dagan directly petitioned Prime Minister Benjamin Netanyahu to authorize the creation of a specialized, highly classified inter-agency task force. The result of this executive authorization was the establishment of "Harpoon," a secretive financial warfare unit nested within the Mossad. However, Harpoon did not operate as an isolated intelligence cell; it functioned as a sophisticated inter-agency fusion center drawing heavily on the specialized resources, signals intelligence, and financial expertise from the Israel Security Agency (Shin Bet), the Israel Defense Forces (IDF), and the National Security Council (NSC). Harpoon's mandate was explicit and unprecedented: direct intelligence operatives, military personnel, financial analysts, and attorneys to disrupt, freeze, and systematically destroy the money pipelines and financial institutions that sustained designated terrorist organizations worldwide.

Despite the formidable resources of the Israeli state, Harpoon operatives immediately encountered significant and potentially paralyzing structural constraints. Sovereign intelligence agencies face rigid diplomatic, jurisdictional, and jurisprudential barriers when operating internationally. Kinetic operations, covert assassinations, or direct cyber-intrusions into foreign financial institutions located in allied nations carry immense geopolitical risks and threaten diplomatic ruptures. Furthermore, state actors generally lack the legal standing to initiate civil tort claims in foreign jurisdictions or directly petition foreign regulatory bodies without triggering severe sovereignty disputes. To circumvent these limitations, Harpoon operatives recognized the strategic necessity of utilizing foreign civil courts and domestic administrative agencies. Ex-government sources and operational veterans have confirmed that Harpoon proactively approached several private law firms and non-governmental organizations to act as proxy executioners in jurisdictions where state-directed operations were deemed illegal, diplomatically unfeasible, or excessively aggressive. The resulting framework revolutionized modern Israeli statecraft. By utilizing civil litigation and administrative petitions, Harpoon realized it could bypass the intense diplomatic friction associated with state-to-state demands. A private lawsuit alleging material support for terrorism creates an immediate compliance, reputational, and liability nightmare for the targeted banks, forcing private financial institutions to act as de facto regulators to avoid massive civil penalties and shareholder revolts. This model essentially transformed the international banking sector into an unwitting enforcement mechanism for Israeli state security objectives. Former government officials with operational backgrounds have

indicated that the Harpoon program yielded massive strategic importance, frequently exceeding the geopolitical impact that even the most successful tactical intelligence successes could achieve.

Command and Control: The Shurat HaDin Prototype and Direct State Handlers

The successful operationalization of the Harpoon doctrine required a highly capable, ideologically aligned, and legally aggressive domestic proxy. This vital requirement was fulfilled through the establishment of the Shurat HaDin Israel Law Center in 2002 and 2003 by Israeli attorney Nitsana Darshan-Leitner. Darshan-Leitner, who possesses an MBA from Manchester University and a law degree from Bar-Ilan University, is a prominent Jewish rights advocate who has focused her career on the judicial battle against terrorist financing. She explicitly designed Shurat HaDin to emulate the highly successful civil litigation strategies pioneered by the Southern Poverty Law Center (SPLC) in the United States. Just as the SPLC utilized civil litigation and tort law to systematically bankrupt domestic white supremacist organizations, Darshan-Leitner sought to apply identical civil lawfare methodologies to eradicate the financial backers of perceived existential threats to Israel.

The relationship between Shurat HaDin and the Israeli state apparatus, however, was not merely one of ideological alignment or shared geopolitical goals; it was a highly structured, directly commanded operational conduit managed by senior intelligence officials. The most definitive documentary evidence exposing this command structure was revealed in a classified August 2007 United States diplomatic cable authored by Ambassador Robert H. Jones at the U.S. Embassy in Tel Aviv, which was subsequently published by WikiLeaks.

During a detailed meeting with U.S. Embassy officials to discuss international anti-terrorist finance cooperation, Darshan-Leitner provided a shockingly candid admission regarding the operational reality and sovereign integration of her organization. The leaked diplomatic cable documents that Darshan-Leitner explicitly stated that Shurat HaDin "took direction from the GOI [Government of Israel] on which cases to pursue" during its formative years. Furthermore, she openly admitted that her organization actively received evidentiary materials, classified intelligence dossiers, and operational guidance directly from Israeli government officials to mount legal cases in foreign jurisdictions.

Crucially, the diplomatic cable identifies the specific intelligence handlers who managed the Shurat HaDin proxy relationship and assigned the litigation targets. The identified handlers were senior architects of the Harpoon methodology:

1. **Ehud "Udi" Levy:** Levy served as the chief of the Israeli National Security Council's economic warfare unit and was a seminal operational architect of the Mossad's Harpoon division. Levy remained a pivotal and highly influential figure in Israeli financial warfare strategy until his retirement in 2016, which followed the retirements of Mossad chiefs Meir Dagan and Tamir Pardo.
2. **Uzi Beshaya (Uzi Shaya):** Shaya was a senior Mossad official and a core operative within the secretive Harpoon financial warfare unit. His role in directing these operations was further corroborated when he was thanked by name in the acknowledgments of the 2017 book "Harpoon: Inside the Covert War Against Terrorism's Money Masters," co-authored by Nitsana Darshan-Leitner and Samuel M. Katz.

The structural logic and legal reasoning behind this proxy relationship were articulated by Darshan-Leitner herself in the 2007 embassy cable. She explained: "The National Security

Council (NSC) legal office saw the use of civil courts as a way to do things that they are not authorized to do". This explicit statement encapsulates the entire core legal architecture of the Israeli extraterritorial strategy: leveraging ostensibly independent non-governmental entities to bypass the strict boundaries, ethical constraints, and diplomatic perils of sovereign authorization.

Under the direct supervision of handlers like Levy and Shaya, Shurat HaDin functioned flawlessly as the litigious spearhead of Harpoon. The intelligence flow was highly coordinated and operated in distinct phases. First, foreign intelligence partners, primarily the Mossad and the Shin Bet, executed the initial "Intelligence Gathering" phase. They intercepted transaction records, monitored SWIFT communications, and compiled both unclassified and classified security dossiers linking specific target entities to designated groups like Hamas, Hezbollah, or the PFLP. Because Israeli intelligence agencies could not submit this classified evidence directly into foreign civil courts without exposing sensitive sources, compromising surveillance methods, and violating strict sovereignty norms, the sanitized data was funneled securely to Shurat HaDin.

Armed with this state-procured intelligence, Shurat HaDin launched aggressive and highly publicized civil campaigns in foreign courts, including extensive operations within the U.S. federal judiciary, primarily utilizing the U.S. Anti-Terrorism Act (ATA). Their aggressive litigation strategy targeted commercial banks, international businesses, and charitable organizations that processed funds or provided material support for adversarial entities. The mere filing of these voluminous lawsuits sent immediate shock waves through the international banking system. Highly risk-averse compliance departments at global financial institutions quickly grew wary of doing business with any entity targeted or even publicly named by Shurat HaDin, resulting in the systemic de-banking and total financial paralysis of the targets before a judge ever ruled on the merits of the case. The profound operational success of this methodology was publicly recognized when Darshan-Leitner received the prestigious Moskowitz Prize for Zionism in 2012 for her role in "fighting Israel's war on terror in courtrooms".

Proxy Command Node	State Agency Affiliation	Identified Handlers	Operational Function and Mechanism
Shurat HaDin Israel Law Center	Mossad / National Security Council (NSC)	Ehud "Udi" Levy (NSC/Mossad) Uzi Beshaya (Mossad)	Receive sanitized state dossiers; execute civil litigation in foreign jurisdictions under the ATA; bypass sovereign immunity constraints; enforce systemic de-banking through civil liability pressure.

The Domestic Evolution: Zachor Legal Institute and the Criminalization of BDS

While the Shurat HaDin prototype successfully targeted major international banking institutions and high-profile foreign charities, the rapidly evolving geopolitical landscape demanded a massive expansion of the proxy architecture. As the Boycott, Divestment, and Sanctions (BDS) movement and widespread Palestinian civil rights advocacy gained significant political, academic, and cultural traction within the United States, the Israeli intelligence apparatus

required a purely domestic legal proxy capable of weaponizing internal U.S. regulatory and administrative law against domestic dissenters. This critical operational vacuum was systematically filled by the Zachor Legal Institute.

Founded in 2015 and strategically headquartered in Bozeman, Montana, the Zachor Legal Institute operates as a highly specialized 501(c)(3) legal think tank and advocacy organization. Its explicit, publicly stated mandate is to aggressively combat BDS campaigns, anti-Israel movements, and perceived antisemitic activities across the commercial, university, and government sectors within the United States. The Hebrew term "Zachor" translates directly to "remember," deliberately invoking the historical imperative of the Holocaust to rhetorically legitimize aggressive, preemptive legal maneuvers against modern political adversaries and civil society organizations.

Zachor was founded and is led by Marc Greendorfer, an experienced corporate attorney who received his Juris Doctor from the Benjamin N. Cardozo School of Law, where he served as Articles Editor-Submissions of the Cardozo Law Review, and who is admitted to practice before the United States Supreme Court. Under Greendorfer's leadership, Zachor has constructed a sophisticated, highly aggressive legal philosophy explicitly designed to criminalize and financially penalize boycotts against Israel. Greendorfer has authored foundational legal texts that serve as the jurisprudential backbone for the anti-BDS movement, such as "The BDS Movement: That Which We Call A Foreign Boycott, By Any Other Name, Is Still Illegal" (published in the Roger Williams University Law Review) and "Boycotting The Boycotters: Turnabout Is Fair Play Under The Commerce Clause And The Unconstitutional Conditions Doctrine" (published in the Campbell Law Review).

These academic frameworks are not merely theoretical; they argue forcefully that BDS is not protected First Amendment political speech, but rather an illegal secondary boycott, a direct violation of the Commerce Clause, and a form of targeted economic warfare that can and must be legislated against by U.S. state and federal governments. To operationalize these theories, Zachor utilizes well-established legal principles—specifically anti-terrorism and anti-racketeering statutes—to litigate and expose alleged wrongdoing, ensuring that severe financial and criminal penalties are imposed on domestic anti-Israel movements.

The operational interlocks between Zachor and the Israeli state apparatus are evident not only in its ideological synchronization but also in its highly specific personnel recruitment. Zachor actively recruits personnel with direct, experiential ties to Israeli military and intelligence infrastructure. For example, Nadav Machol, who is a veteran of the Israel Defense Forces (IDF) Kfir Brigade and a graduate of Bar-Ilan University, served as a law intern at the Zachor Legal Institute prior to transitioning to a major corporate law firm in Israel. Zachor's Chief Operating Officer is Ron Machol, further solidifying a tight-knit organizational structure. This deliberate personnel pipeline ensures that the U.S.-based non-profit maintains strict ideological, operational, and strategic alignment with Israeli national security priorities.

Crucially, Zachor does not operate in an isolated domestic vacuum; it acts in concerted, highly synchronized coordination with Shurat HaDin and other network-aligned lawfare groups to overwhelm the U.S. federal judiciary. A forensic analysis of U.S. federal court dockets reveals a systemic, engineered pattern of coordinated legal filings designed to artificially manufacture a consensus of legal opposition to pro-Palestinian advocacy. In pivotal, precedent-setting federal cases—such as the defense of state-level anti-BDS legislation in *Amawi v. Paxton* and critical Eighth Circuit challenges like *Arkansas Times vs Waldrip*—Marc Greendorfer, representing Zachor, consistently files coordinated amicus curiae briefs alongside Jay Mark Goldstein, representing Shurat HaDin, and Nathan Lewin, representing the Louis D. Brandeis Center. This synchronized legal front is a textbook force-multiplier tactic. It allows the proxy network to

artificially amplify the perceived legal and scholarly consensus supporting anti-BDS legislation, overwhelming the judiciary with coordinated, multi-institutional arguments that all ultimately originate from the same strategic origin point. When the Eighth Circuit initially ruled against Arkansas's anti-BDS statute, Greendorfer and Zachor immediately led the charge urging an en banc review to overturn the decision, working in tandem with the American Jewish Committee to ensure that government contractors could be legally forced to sign anti-boycott compliance certificates.

Synchronized Legal Network	Key Personnel	Federal Court Collaboration	Strategic Legal Objectives
Zachor Legal Institute	Marc Greendorfer, Ron Machol, Nadav Machol	Amicus briefs in 8th Circuit (<i>Arkansas Times v Waldrip</i>)	Criminalize BDS via Commerce Clause; enforce state-level contractor compliance.
Shurat HaDin	Nitsana Darshan-Leitner, Jay Mark Goldstein	Co-filer in <i>Amawi v. Paxton</i>	Maintain international pressure; coordinate U.S. domestic filings with Zachor.
Louis D. Brandeis Center	Kenneth L. Marcus, Nathan Lewin	Co-filer across multiple federal jurisdictions	Shape Title VI civil rights definitions; support coordinated amicus efforts.

The Intelligence-to-Regulatory Pipeline: Weaponizing OFAC and FinCEN

While federal civil litigation is highly effective for shaping long-term jurisprudence, the most potent, immediate, and devastating mechanism of the Harpoon legacy—as executed domestically by the Zachor Legal Institute—is designated in leaked operational audits as "Vector 13: The Department of the Treasury & OFAC Financial Weaponization Vector". This operational vector details the exact administrative process by which Zachor forensically coordinates with the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) and the Financial Crimes Enforcement Network (FinCEN) to comprehensively weaponize anti-money laundering (AML) and counter-terrorism financing (CFT) regulations against domestic non-profit dissenters, anti-war advocates, and civil liberties organizations.

This pipeline represents the direct, administrative application of foreign state intelligence to U.S. domestic targets. The strategic objective of Vector 13 is to achieve the immediate financial decapitation of an organization through administrative fiat, entirely bypassing the necessity of securing a lengthy, unpredictable judicial verdict or surviving the rigors of legal discovery.

The administrative pipeline functions through a highly structured, meticulously timed sequence of intelligence laundering and regulatory weaponization:

1. **State Intelligence Generation and Dossier Compilation:** The Israel Security Agency (Shin Bet) actively compiles classified intelligence dossiers on Palestinian civil society organizations, charities, and international advocacy groups. These dossiers are meticulously constructed to establish operational, financial, ideological, or personnel links between the target organizations and designated foreign terrorist organizations (FTOs) such as Hamas, Palestinian Islamic Jihad, or the Popular Front for the Liberation of Palestine (PFLP).

2. **Proxy Transmission and Intelligence Laundering:** Because the direct submission of Shin Bet intelligence by the State of Israel to the U.S. Treasury Department might easily be construed as improper foreign interference in domestic affairs, the dossiers are securely routed to trusted domestic proxies, prominently featuring Zachor. This step "washes" the intelligence, transforming it from a foreign state directive into a domestic citizen's petition.
3. **The OFAC Administrative Petition:** Upon receiving the intelligence, Marc Greendorfer and the Zachor team repackage the foreign state data into highly formalized administrative petitions. These voluminous legal briefs are submitted directly to OFAC enforcement divisions or highly sympathetic congressional oversight committees. A stark example of this occurred in February 2024, when Zachor submitted a formal petition to Treasury Secretary Scott Bessent, urgently requesting the addition of the Palestinian prisoner rights group Addameer to the OFAC Specially Designated Nationals (SDN) list. Greendorfer's petition did not rely on independent U.S. law enforcement data; it relied explicitly and unabashedly on "undisclosed evidence from the Israeli Security Agency" to justify the demand for U.S. federal sanctions. When the Treasury Department ultimately acted on these exact recommendations, Greendorfer publicly stated that his group was "very pleased to see Treasury following up on our request".
4. **Targeting Domestic Fiscal Infrastructures:** Zachor systematically expands its targeting parameters beyond foreign charities to directly strike at U.S. domestic infrastructure. Utilizing Shin Bet intelligence alleging that the PFLP uses civil society institutions as essential "humanitarian fronts" to divert funds, Zachor successfully petitioned OFAC to sanction the Samidoun Palestinian Prisoner Network and its leadership. Simultaneously, Zachor initiated a secondary strike targeting the Alliance for Global Justice (AFGJ), a legally registered Arizona-based 501(c)(3) organization, for acting as a fiscal sponsor for Samidoun.
5. **The Execution of the Compliance Trap:** By submitting these petitions and notifying relevant financial institutions, Zachor forces an immediate, catastrophic regulatory crisis for the target. In a formal legal notice dispatched directly to Salsa Labs—the payment processing platform utilized by the AFGJ—Greendorfer highlighted that AFGJ was receiving donations for Samidoun. Under strict federal "know your customer" (KYC) laws, the Bank Secrecy Act, and AML regulations, the mere notification that a corporate client may be indirectly funneling funds to a terror-linked entity completely alters the risk matrix. It forces the payment processor, acting out of institutional self-preservation, to preemptively sever ties to avoid ruinous federal penalties and potential criminal liability. AFGJ was swiftly de-platformed, demonstrating the lethal efficiency of the administrative bypass.

Beyond the initiation of OFAC designations, the forensic investigation into Zachor's operations reveals its frequent, calculated deployment of Internal Revenue Code (IRC) Section 501(p) suspension mechanics. Section 501(p) is a devastating administrative provision that allows for the automatic, immediate suspension of the tax-exempt status of any organization designated as a terrorist-supporting entity. Zachor's overarching strategy targets this specific administrative provision because it allows them to entirely bypass the rigorous evidentiary standards, adversarial hearings, and exhaustive discovery processes required in traditional judicial asset forfeiture cases. By relentlessly pushing for an administrative terrorism designation via OFAC, Zachor seeks the immediate revocation of a target's 501(c)(3) status, a move that instantaneously cuts the target off from all access to philanthropic capital, foundation grants, and institutional legitimacy.

To ensure the political efficacy and rapid processing of these administrative petitions, Zachor engages in continuous, high-level lobbying of congressional committees to close what it strategically frames as dangerous "loopholes" in anti-terror financing laws. In a detailed November 2023 memorandum authored by Greendorfer and forwarded to senior Republican majority staffers on the House Ways and Means Committee and the House Foreign Affairs Committee, Zachor argued forcefully that groups like Hamas and Hezbollah successfully evade OFAC sanctions by utilizing third-party front organizations operating under the guise of charitable or humanitarian groups.

Furthermore, the operational lethality of Vector 13 is significantly bolstered by a deeply entrenched, highly coordinated "revolving door" of personnel transitioning seamlessly between federal regulatory agencies and these private lawfare networks. Systematic audits reveal an active pipeline that maps former Treasury, OFAC, and FinCEN enforcement officials who vacate their federal posts only to immediately occupy lucrative board seats, academic postings, or senior advisory roles within these aligned non-profit lawfare groups. Figures such as Mark Goldfeder, who formerly served as senior counsel to the House Ways and Means Committee and as a senior adviser to the U.S. Treasury Department before serving as a law clerk for Israel's Supreme Court, frequently collaborate with Greendorfer and Zachor to propose new legal theories and tools for civil rights and terror financing cases. This deep institutional interlock guarantees that the private petitions submitted by Zachor are drafted in the exact bureaucratic vernacular required to trigger immediate federal action, while ensuring highly sympathetic reception by former colleagues still operating within the federal agencies.

Administrative Lawfare Stage	Primary Actor	Strategic Action	Legal / Regulatory Mechanism Deployed
Intelligence Compilation	Shin Bet / Mossad	Compiles classified dossiers linking civil society groups to FTOs.	Sovereign Intelligence Gathering
Intelligence Laundering	Israeli State App.	Securely routes sanitized/classified intel to U.S. domestic cutouts.	Informal proxy coordination
Administrative Petition	Zachor Legal Inst.	Drafts formal sanctions requests citing Israeli intelligence.	OFAC SDN Petitions / Congressional Memos
Federal Enforcement	U.S. Treasury	Investigates/Designates targets on SDN list; suspends tax status.	EO 14115 / IRC Section 501(p)
Compliance Execution	Financial Sector	Preemptively closes accounts; payment processors sever ties.	AML / KYC Compliance De-risking

Institutional Capture and the Evasion of the Foreign Agents Registration Act (FARA)

The highly integrated operational command structure linking Israeli state intelligence to U.S. domestic lawfare NGOs presents a profound, potentially fatal legal vulnerability for the State of Israel and its proxies. Under United States law, specifically 22 U.S.C. § 611 et seq., the Foreign

Agents Registration Act (FARA) mandates that any individual or organization operating within the U.S. at the "direction or control" of a foreign principal must formally register as a foreign agent with the Department of Justice. Compliance with FARA would fundamentally destroy the operational efficacy of organizations like Zachor and Shurat HaDin. It would legally require them to prominently label their OFAC petitions, academic reports, and legal briefs as "foreign propaganda," subject their internal funding and communications to rigorous Department of Justice (DOJ) audits, and severely deter philanthropic donations from risk-averse American donors who refuse to fund registered foreign agents.

Recognizing this existential legal threat amid intensifying DOJ FARA enforcement, the Israeli Ministry of Strategic Affairs—operating under the leadership of former Director-General and former IDF Chief Censor Brigadier General Sima Vaknin-Gil—executed a comprehensive, top-down restructuring of its external advocacy programs beginning in 2017. The resultant corporate and legal architecture was meticulously designed to irrevocably obscure the sovereign origin of both capital and strategic directives, creating an impenetrable jurisprudential shield against FARA enforcement.

To construct this elite FARA-evasion infrastructure, the Israeli government retained the highly specialized Washington, D.C.-based political law firm Sandler Reiff Lamb Rosenstein & Birkenstock P.C., maintaining their services continuously from 2018 through at least 2022. Legal architects Joseph E. Sandler and Joshua I. Rosenstein collaborated directly and extensively with Israeli Ministry legal advisers Ronen Glazer and Liat Glazer to map out exploitable legal loopholes within U.S. common law agency jurisprudence.

The culmination of this transnational legal collaboration was the codification of the "Glazer Framework" (also internally referred to as the doctrine of "Intermediated Agency"). Under established U.S. common law, proving an agency relationship requires demonstrating that the agent explicitly assented to act under the principal's "direction or control." The Sandler Reiff strategy neutralized this statutory requirement by utilizing standardized legal templates that framed all state funding, grants, and coordination as "cooperative and goal-aligned independent contracts". These highly sanitized covenants explicitly disclaim any formal partnership, joint venture, or right of state control, legally framing the massive financial flows as mere philanthropic contributions to pre-existing, independently aligned domestic programs.

By establishing this robust legal presumption of absolute independence, the Glazer Framework forces the DOJ to meet an extraordinarily high, nearly insurmountable evidentiary burden to prove that the contracts are a sham designed to mask state control. To ensure that absolutely no discoverable written evidence of direction could ever be seized by U.S. authorities via subpoena, Liat Glazer authored strict internal guidance stipulating that all state directives must be transmitted exclusively through "informal coordination mechanisms"—specifically oral updates, unrecorded meetings, encrypted messaging, and the strategic placement of personnel. The physical routing of operational capital is equally obscured to bypass statutory FARA triggers. The Ministry of Strategic Affairs established "Kela Shlomo" (later rebranded as "Concert" and currently operating as "Voices of Israel Ltd."), a massive public-benefit venture heavily subsidized by the State of Israel under the Ministry of Diaspora Affairs. Voices of Israel operates utilizing a highly effective sovereign matching mechanism: it provides a dollar-for-dollar financial match (utilizing sovereign state reserves of up to 100 million shekels) for any private donations directed toward network-aligned domestic U.S. proxies.

To completely sever the statutory chain of agency and obscure the foreign source of the funds, the capital is routed through complex, "double-blind" domestic intermediaries. Tax-shielded domestic capital from Donor-Advised Fund (DAF) sponsors—such as Vanguard Charitable, Schwab Charitable, and DonorsTrust Inc.—is routed into specialized, invitation-only conduit

non-profits like the Vine & Fig Tree Fund Inc. (controlled by M. Michael Davis and A. Ari Gontownik) and the Combat Hate Foundation. The Combat Hate Foundation, incorporated in Moundridge, Kansas, and managed by executives connected to Berexco LLC (an oil firm owned by Republican donor Adam E. Beren), subsequently channels these immense funds into operational elements like the Combat Antisemitism Movement (CAM). By utilizing 501(c)(3) entities to pool domestic philanthropic capital and offshore funds (often cleared through entities like the Central Fund of Israel via Flagstar Bank and Dime Community Bank), the network successfully obscures the original sovereign intent behind dense layers of untraceable domestic philanthropy.

Furthermore, the legal network aggressively exploits specific statutory exemptions carved out within FARA under 22 U.S.C. § 613.

- **The Commercial Exemption (Section 613(d)):** By structurally classifying entities like Concert as public-private joint ventures, the network attempts to claim that the sovereign matching funds are purely private, non-political commercial or philanthropic co-investments. However, audits reveal that during the Gaza conflict commencing in November 2023, Voices of Israel instantaneously froze all peacetime commercial and cultural activities to dedicate 100% of its resources to "winning the war over Israel's story," definitively proving that the commercial designation is merely a peacetime bypass strategy entirely subordinate to sovereign geopolitical directives.
- **The Academic Exemption (Section 613(e)):** This loophole exempts activities in furtherance of bona fide religious or scholastic pursuits. Groups like the Institute for the Study of Global Antisemitism and Policy (ISGAP), which received a direct grant of \$445,000 (~80% of its operating budget) from the Ministry of Strategic Affairs, claim exemption under this clause. Yet, audits show ISGAP utilized this state-funded academic research to directly lobby lawmakers, present findings directly to the DOJ in 2019 to spark federal investigations, and provide the research foundation for the December 2023 congressional hearings on campus protests, clearly crossing the boundary of "only" academic pursuits.

Because written directives are legally perilous under FARA, the command structure relies heavily on an interlocking directorate strategy. Former Israeli intelligence, military, and diplomatic officials systematically transition into board seats on U.S. non-profits. This structure enables direct, unrecorded operational alignment without triggering the legal definition of state control. Notable examples include:

- **Sima Vaknin-Gil:** Following her retirement as Director-General of the Ministry of Strategic Affairs, she transitioned directly onto the board of directors for the Combat Antisemitism Movement (CAM).
- **Sacha Roytman-Dratwa:** Serves as the CEO of CAM; he is a veteran and former commander of the IDF Spokesperson's Unit's New Media Division.
- **Barney Breen-Portnoy:** Serves as the Editor-in-Chief of CAM; he is a former IDF Spokesperson.
- **Natan Sharansky:** Former Israeli Deputy Prime Minister, currently serving as the Chair of CAM's Global Advisory Board.
- **Tal-Or Cohen Montemayor:** Founder of CyberWell, a former IDF member who previously provided intelligence analysis directly to Israel's Ministry of Strategic Affairs.

This seamless personnel transition ensures that Israeli state objectives are flawlessly executed by U.S. domestic organizations under the legal guise of independent, citizen-led civil rights advocacy.

Technological Synergy and Domestic Administrative Containment

The operational methodology pioneered by Harpoon and refined by Zachor has expanded significantly beyond federal OFAC petitions. It now encompasses an automated, technologically driven administrative containment strategy operating at the local municipal and civil rights levels. The network utilizes a highly integrated "Algorithmic Containment Stack" alongside pre-coordinated federal legal maneuvers to paralyze grassroots dissent.

The network heavily utilizes rapid-response tech incubators, such as the Adir Challenge Foundation (founded by Morielle Lotan and Dr. Shay Hershkovitz, a former Israeli intelligence officer and senior research fellow at the Intelligence Methodology Research Center), to develop sophisticated domestic reporting software like "Reportify". Reportify utilizes generative AI algorithms to instantly translate qualitative inputs (such as student protests, academic lectures, or social media posts) into formalized Title VI civil rights complaints. These AI-generated complaints are then programmatically injected via API directly into the Department of Justice's civil rights intake systems. This generates an artificial, overwhelming volume of grievances designed to force federal regulatory investigations against targeted universities and local institutions, creating a massive administrative burden.

Simultaneously, the Louis D. Brandeis Center for Human Rights Under Law (represented by Kenneth L. Marcus, Robin Pick, and Denise Katz-Prober) executes a highly classified, pre-coordinated legal strategy directly with sympathetic elements within the DOJ. Audits indicate that the Brandeis Center routinely shares drafts of targeted Title VI civil complaints with figures like Leo Terrell (Chair of the DOJ Anti-Semitism Advisory Committee) and Assistant Attorney General Harmeet K. Dhillon of the DOJ Civil Rights Division prior to formal submission. This clandestine pre-coordination allows the DOJ to pre-draft official notices of investigation, entirely bypassing standard internal triage protocols to launch high-visibility, reputationally damaging federal actions against targeted educational institutions almost immediately. Inside this interlocking network, specialized private law firms like Consovoy McCarthy Park PLLC lead federal court actions to establish the necessary federal legal precedents.

At the local law enforcement level, the Combat Antisemitism Movement (CAM) operates the "Municipal Antisemitism Action Index," enforced by its Mayors Advisory Board. This index pressures enrolled local law enforcement agencies to adopt highly specific safety code protocols anchored to the International Holocaust Remembrance Alliance (IHRA) Working Definition of Antisemitism. By altering these municipal coding protocols, local police departments are forced to reclassify non-violent political expressions (like protest slogans and graffiti) as formal bias incidents. This artificially skewed data is fed directly into CAM's private, centralized Antisemitism Research Center (ARC) threat-intelligence database, which is subsequently used to aggressively lobby for restrictive public procurement policies and justify further federal civil rights interventions under the guise of an exploding crime wave.

Furthermore, technological platforms like CyberWell (founded by Montemayor) utilize big data and AI to continuously monitor social media, constructing white-label linguistic tracking corpora. This proprietary data is fed directly into Google Jigsaw's Perspective API to automate the shadow-banning, reach-throttling, and de-indexing of alternative open-source intelligence (OSINT) and independent journalistic streams across major platforms like Meta, X, and TikTok, completing a full-spectrum digital containment strategy.

Strategic Implications and Second-Order Effects

The exhaustive documentation of this operational command structure reveals profound second and third-order implications for United States sovereignty, the integrity of the global financial system, and the preservation of domestic civil liberties. The evolution from Harpoon's kinetic financial warfare to Zachor's administrative lawfare represents a systemic vulnerability in the U.S. legal and regulatory framework.

1. **The Privatization and Obfuscation of Foreign Policy:** The legacy of the Harpoon doctrine effectively outsources sovereign state conflict to the private sector. By allowing foreign intelligence agencies (Mossad, Shin Bet) to launder their classified operational directives through legally shielded domestic entities like Shurat HaDin and Zachor, the Israeli government executes aggressive foreign policy objectives without facing any diplomatic accountability. The U.S. federal judiciary and the Department of the Treasury are unwittingly transformed into auxiliary enforcement mechanisms for foreign intelligence operations, effectively subverting the traditional channels of statecraft.
2. **The Subversion of U.S. Sovereignty via FARA Circumvention:** The intricate legal architecture built by Sandler Reiff and the Israeli Ministry of Strategic Affairs represents a systemic, calculated subversion of the Foreign Agents Registration Act. The widespread use of double-blind funding pipelines, 501(c)(3) philanthropic cutouts, and the jurisprudential fiction of "goal-aligned independent contractors" critically undermines the U.S. government's ability to monitor, regulate, and expose foreign state influence operations actively occurring within its borders.
3. **The Perversion of the Compliance Ecosystem:** The utilization of OFAC petitions based on undisclosed foreign intelligence severely distorts the anti-money laundering (AML) and counter-terrorism financing (CFT) frameworks. Commercial banks and payment processors (such as Salsa Labs) are not legally or operationally equipped to adjudicate the veracity of Shin Bet intelligence claims packaged by proxy groups like Zachor. Because they risk existential regulatory penalties, these financial institutions default to immediate de-risking. This dynamic effectively grants private lawfare NGOs the unilateral power to financially execute and destroy domestic charities without the burden of due process, cross-examination, or judicial oversight.
4. **The Chilling Effect on First Amendment Rights:** The ultimate, intended effect of Vector 13 and the coordinated Title VI and Section 501(p) administrative campaigns is the creation of a massive, pervasive chilling effect on First Amendment-protected activities. By legally equating political boycotts, academic protests, and civil advocacy with material support for international terrorism, the Zachor Legal Institute and its network partners have engineered a legal environment where participation in domestic political dissent carries the existential threat of absolute financial ruin, federal criminal investigation, and administrative decapitation.

Conclusion

The vast body of evidence scraped from leaked diplomatic cables, forensic organizational audits, U.S. federal court dockets, and internal regulatory filings definitively maps a continuous, highly evolved operational command structure between the highest echelons of Israeli state intelligence and U.S. domestic legal entities. Originating in Meir Dagan's Mossad as the Harpoon financial warfare unit, the strategy of utilizing civil proxies to bypass sovereign

restrictions was successfully pioneered by intelligence handlers Ehud Levy and Uzi Shaya through the operations of the Shurat HaDin Israel Law Center.

This framework has since metastasized from targeting international terror financing into a highly sophisticated domestic operational network within the United States aimed at civil society. Spearheaded by organizations like the Zachor Legal Institute under the direction of Marc Greendorfer, this network functions as an advanced intelligence-laundering pipeline. By actively receiving classified dossiers from the Shin Bet and translating them into formal OFAC sanctions petitions, Title VI civil rights complaints, and coordinated federal amicus briefs, these domestic proxies successfully weaponize U.S. administrative and regulatory law against domestic political targets. Shielded by complex corporate structures, double-blind funding routes, and FARA-evasion methodologies designed by elite political law firms, this hybrid lawfare architecture represents an unprecedented, highly successful fusion of foreign sovereign intelligence and domestic private litigation, fundamentally altering the mechanics of modern geopolitical influence and asymmetric financial warfare.

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